

BATCH 1 CONSULTATION RESPONSES

Consultation on the White Paper on Ending Homelessness in Wales

Responses Provided via Smart Survey

Fully Completed Responses

White Paper on Ending Homelessness in Wales

Response 1

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

There is little flexibility in the current rules.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No Response

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

There are very large numbers of people with autism in mental hospitals and prisons. These people are vulnerable and should be viewed as homeless if their accommodation is inappropriate. Not all disabled people have access needs, you are not meeting the terms of your own autism act.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Learning disabilities and autism should be included as a category

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Start ensuring autistic people and the learning disabled have appropriate housing and support.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 2

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No Response

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

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Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

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Implementation

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Response 3

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No Response

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

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No Response

Response 4

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

Retention of belongings - Fantastic Idea and will certainly save WG and LA's money in the long run through a reduction in DAF fund applications etc

We propose an amendment to the Social Services and Well-being (Wales)

Act 2014 to ensure retention of belongings is included as part of the reasonable steps that need to be taken under Part 11 of that Act.

Losing all personal belongings has both a negative impact on someone's mental health as well as their physical health, especially if the personal items being destroyed were of their loved ones, loved ones urns of ashes, sentimental photographs, passport, driving licence, bank cards etc as trying to set these things up once leaving prison usually causes a deal in any sort of benefit payment, which could cause the individual to reoffend due to lack of money.

Trial this out of one the prisons where you fund a support organisation to hire a number of secure containers , and limit the prisoner to storing a box of personal belongings of a certain size, not difficult to set up but pays massive dividends in the long run - Personally I would suggest HMP EWP as women are more vulnerable than men and tend to retain a lot more personal belongings

Duty to provide information, advice and assistance in accessing help

To ensure consistency of access and assessment, we propose to make it clear this duty places an expectation on local authorities, where there is a secure establishment within its boundaries, to secure the provision of a sufficient advice service to those in both adult or youth custody.

This is absolutely critical and has so many added benefits to all involved, based from experience there is very little support, advice or guidance at reception stage since removing the responsibility from Prison Link Cymru, this team should have expanded to offer this area of expertise in every prison, not had the contracted work removed from them, since it has things have deteriorated rapidly as there is no one that offers this support now.

releiving prisoners anxietys at an early stage makes them have a much better experience throughout their custodial sentence, rather than worrying 9 months in have i lost my house or not

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Demand all support organsiations offer a trauma informed approach to all areas of support (Eg All meetings should take place face to face wherever possible, rather than via video link etc), this is key to building trust and relationships with the prisoner.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

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Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

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No Response

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yes

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No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

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No Response

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No Response

Implementation

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No Response

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No Response

Response 5

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

Look at New York

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

YeS

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No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

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No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

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No Response

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No Response

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Disagree

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

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No Response

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No Response

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No Response

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No Response

Implementation

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No Response

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No Response

Response 6

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

I feel that early intervention and less restrictions for anyone at risk of homelessness is vital

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Human Rights Act and Un Convention of the rights of the Child

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes as nobody should be exempt if risk of homelessness

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Not that I am aware of

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

To ensure it sets a duty to everyone to identify and not just for certain individual's, multi agency working and everyone is working to the same standards and duties

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Schools

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

yes

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Appropriate staff to deliver, standards and procedures to guide individuals so all working off the same practice
Location and regular training updates, whether that be online for updates

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

I feel this could assist them but I think it will depend on the service user and the services involved due to multiple complex needs

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not that I can think of

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Children on child protection register or have services involved with social services

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

social services and wellbeing wales act 2014, UN rights of the child

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challenges - housing availability, costs that local authority has to provide and maintain properties as well as availability of them. Services are working short staffed with increased workloads , therefore added pressures may cause making it legal to be an unrealistic and setting people up to fail before they start

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Working with school nurses and social services and multi agency working, using the Social services and wellbeing wales act 2014

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

agree, as with lots of child poverty and areas of deprivation, some children may need this extra support to start over if dealing with child ACES

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not that i can think of

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

yes i agree, although unsure how this could realistically be done with budget cuts and lack of services

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

I agree, there will potentially be the minority that may suffer if removed from housing due to unacceptable behaviour, therefore what can be done to address these issues rather than making it worse

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

yes I agree, although this comes with a costs and there will be an increased demand

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

no

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

I think it will support it, but costs and what services can actually offer needs to be considered

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

Current law and guidance

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

no

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

none

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 7

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

It's been years of being homeless for me, waiting for a property to become available never happens. I'm so looking forward to sleeping in my car this winter for the 6th year running. I was even taken off the housing register last year. I'm back to the start again.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

The past 2 decades can't be undone. The uk has been destroyed

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

You people are so out of touch with the real problems with homelessness.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Scrap it, you can't change a single thing

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No

Please give your reasons:

You can't prevent it.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Remove it all. Waste of money

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

health has never mattered to anyone in government

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

The government can't manage anything.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Response 8

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

They appear to be toothless without the corresponding increase in social housing

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Extend article 4 to include student accommodation which the demand for is restricting local housing availability in university towns

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

The cost to the Welsh language

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Welsh language speakers

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No, contrary to legal capacity for contracts

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

Compulsory purchase powers extended on empty properties including empty business units on traditional high streets

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No, it appears negative to welsh language speakers

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Q33. If you want to receive a receipt of your response, please provide an email address. Email address

No Response

Q34. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 9

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

Allow councils to act earlier

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Yes. There is a suggestion that councils can stop dealing with a homeless person if they miss appointments. The cause of the missed appointments should be thoroughly investigated and if the person is neurodivergent or missed appointments for other health reasons then the ability for the council to stop working with the person should not be permitted.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

There will always be things that are missed.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Not quite in relation to the ability of councils to stop dealing with a homeless person where there are health grounds for missed appointments.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

People who are neurodiverse could potentially fall into the unintentionally homeless trap as a result of their condition

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Yes but any such amendments should not mandate landlords to accept those individuals. Landlords may be looking for mature tenants with a number of years of renting and experience of paying bills.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 10

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

Not enough accommodation, structure in place, and people need to want to be housed

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Research more why its happening, offer cheaper housing, train people to get back into work, or even volunteer themselves

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Retraining

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Empathy and understanding of client needs. Short 1-2 hour sessions. Not classroom based. You need to value your clients.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Dont know

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Unsure

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Under 18's, ex forces, people hit by cost living crisis

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

....

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

Empathy and understanding

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Not qualified to say

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Yed

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

...

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Yes, renovate vacant properties

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

...

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

...

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

In part

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 11

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

In brief: There is no additional funding and no actual, measurable, auditable outcomes being expected, so this will fail.

In detail: There is a lot of worthy hope and well-meaning legislative tinkering but "show me the money". You actually explicitly note that this is what is required in the report itself but don't deliver it as you argue there is no money. Sadly, a report and legislation doomed to go on the shelf and gather dust as a result. Your proposal introduction notes: "Arguably, the most significant external factor has been the Covid-19 pandemic. In early 2020, as the potential seriousness of the pandemic became known, Welsh Government provided additional guidance and FUNDING to local authorities to ensure everyone who presented to homelessness services without accommodation, were provided with the accommodation and support they needed to stay safe."

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Ones that give explicit funded measurable directions and requirements

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Honestly, without funding, does it matter?

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Yes, the actual cost of doing this. It won't happen as there is no additional money to make it happen. A great shame. Wales has been talking about sorting homelessness for a decade and only the pandemic, with Rishi's magic money, allowed Wales to rise up and really sort it. Something to be proud of but now we're back to well-meaning and forgotten-quickly pieces of work like this.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

But "show me the money" otherwise it is not worth the legislative paper it is written on.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Sigh, what is the point commenting on this if there is no funding?

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

There is no money so nothing will happen so the balance is irrelevant.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Money, money, money.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

I laughed out loud reading this. That costs money. There is none.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

All of them. You are not promising any money - you are very clear and explicit about that. Therefore <all> the bodies suddenly tasked to magically find some new services will do the usual i.e. bury this in meetings and discussions and it will never happen.

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

The homeless as there are no funds here.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Funding, not policy, is what is needed. Policy without funding is like having a car with any tyres and being told to drive it somewhere.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

The unintended consequences of further disenchanting, disempowering and disenfranchising an already battered public sector. This will lead to more staff burnout and fewer staff.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No, there isn't any money.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Agree.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Fund things first otherwise this is just hot air

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Agree. But no funds so not realistic.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

Agree. But no funds so not relevant.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No money.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

You have no funds so this is a pointless question.

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

They won't as there are no funds.

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

Money, money, money, money.

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Need funds to answer this question.

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No idea

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

"Show me the money" sums up my despair at this well-meaning unfunded idea.

Response 12

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No Response

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

No Response

Q5. Do you agree with our proposal to abolish the Intentionality test?

No Response

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No Response

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Submit your response

Q29. Do you live in Wales?

No Response

Q30. Do you have a business interest in Wales?

No Response

Q31. Please provide the first part of your home postcode, e.g. CF10

No Response

Q32. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

No Response

Q33. If you want to receive a receipt of your response, please provide an email address. Email address

No Response

Q34. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 13

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No Response

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

No Response

Q5. Do you agree with our proposal to abolish the Intentionality test?

No Response

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No Response

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

The Royal College of Physicians (RCP) is grateful for the opportunity to respond to this consultation. We have liaised with our experts who have commented as follows.

This is a very much welcomed, impressive amount of very thoughtful, wide ranging and timely work. Our experts note however, that more definitive standards are needed. For example:

- No person to sleep rough for more than 72hours.
 - No person to leave hospital or prison without accommodation arranged.
 - All hospitals and prisons to apply Duty to Refer rules as per the law.
 - All hospitals with more than 30 homeless admissions per year to have a housing officer/specialist nurse in place.
- Hospitals with less than 30 to have clear signposting to services. All hospital staff to be trained in managing the homeless.
- All homeless with substance misuse issues to have immediate, mandatory referral to drug and alcohol services with community support.
 - A level of temporary accommodation should be maintained (it can be very helpful when discharging people from hospital and prison and for Severe Weather Emergency Protocol (SWEP). But ensure high standards of care with medical, drug and alcohol and housing teams and mandate regular inspections. Set time limit eg 12 week's maximum.
 - Apply Safeguarding and Mental Capacity assessments to all homeless.

Response 14

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

It ensures people have more rights and helps protect people from becoming homeless, it increases the accountability of local authorities, it ensures services/agencies work collaboratively to support people who are homeless/at risk of being homeless

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes. However, adding people who are 'care-experienced' is very vague and can be interpreted in different ways. Is that someone who has had experience of being in care through social services, or someone who has experience of being a carer for another individual?

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

Yes because lack of communication and inter-professional information sharing is where the shortfalls happen. If a professional has a duty to identify, refer and co-operate they will be accountable for their actions and will take it more seriously.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

I wouldn't add or remove anyone from the list.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Yes

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Training and education sessions for professionals e.g. inter-professional communication and to learn about other agencies/services roles and responsibilities
Increased staffing levels - more funding in high need areas such as Social Services & Health (Health Visiting)

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Yes, as stated as long as there is a co-ordinator so that the person's specific needs are met, barriers are addressed, and all professionals/agencies/services involved are aware of their roles and responsibilities

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No - however, as stated, I believe 'care-experienced' needs to be more specific as it sounds confusing

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

I believe the proposal should be more specific. Children may have had a minor experience with the care system e.g. may have been on a CASP, however, their parents may have had sufficient support and their childhood may not have been impacted by this. Whereas other children may have been removed from their parents, taken into foster care and may have multiple adverse childhood experiences. Therefore, it is unclear who would qualify for targeted support.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Yes, I believe it is sufficient

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Definitely, I agree. Some children are faced with extremely poor circumstances requiring them to rent a home. I do not feel they should be penalised due to their age.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

I strongly agree & no

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

I manily agree. However, I fear that some people may be on a waiting list for a considerable amount of time.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

Yes I agree, however, I believe it should be person/family-centred and based on their needs e.g. I do not believe it is suitable for a large family or a newborn baby to temporarily live in supported/shared accommodation

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

Yes, I believe it will strongly support the proposed reforms

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

For the local authority to allocate each individual/family unit a key worker to monitor their progression and support needs

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

Have professionals in all services/agencies that are able to deliver their services through the Welsh Language.
For information leaflets/letters to be available in English and in Welsh.
For website to have a Welsh Language version.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No

Response 15

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

I am very much coming from a health perspective. I do not feel they are broad enough to ensure health commit to supporting this population.

I have completed a comprehensive mapping and gapping exercise of the needs of homeless people and staff supporting them in Gwent. I have also benchmarked with other areas and mapped out the needs of street homeless people in Newport. This has highlighted multiple needs including significant trauma, cognitive impairments, substance use, mental health issues, forensic issues and a main barrier is access to mainstream mental health services and crisis support. Service users and staff within temporary accommodation have completely lost faith in mental health services. Also, cognitive impairment is not considered in the paper, it is predicted that approximately 50% of people who are homeless have cognitive impairments whether due to learning disability, traumatic brain injuries or alcohol related brain damage. They are also at risk of violence which could potentially cause further brain damage and more trauma. There is no service in this area that can support us in assessing and understanding the issues and needs of the population regarding this. I feel there needs to be an outreach based MDT (health and social services) service that goes to service users, work alongside current support staff who know them well and they trust (e.g. Salvation Army, Wallich, POBL) and work on engagement with them prior to assessment. They need to have access to crisis and inpatient services. There needs to be better connection between drug and alcohol and mental health services, often clients with substance use issues are turned away at the door of mental health service. A more joined up person centred approach is needed. Remove the word possibly joint funded - and compel services to provide this.

Also, as an aside, from our work we have observed that another at risk group for homelessness are LGBTQ+ individuals. Some research was done on this by Tai Pawb, but this population I feel should also be reference in the act.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Mental health/ substance use joint multi-disciplinary teams working in an outreach format, alongside regular workers, to foster relationships, trust and engagement.

Prevent the opportunity of crisis teams and CMHTs turning people away due to their substance use, offering more flexible access- a commitment to access to these services for this population
111/ mental health services to consider how to enable access for as opposed to sending people back through primary care or closing cases as they are unable to attend an appointment- recognising the specific needs of this population

Access to neuro-psychological and LD services in terms of testing and ongoing support/advice/consultation

I feel that Mental health and substance use services should be audited on their co-working (or current lack of it) and be asked to provide evidence, examples, from both perspectives.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

yes

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Again the health needs need to be considered

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:
co-operation and early intervention are key

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

I am assuming at least health (substance use, Mental health, learning disabilities, neuropsychology), social services, housing and 3rd sector such as salvation army are included?

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

d/k my focus is on the health element

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

sharing of information agreement
commitment
standards and audit by regulatory bodies

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

I feel strongly that case co-ordination is very important aspect, and they should maintain a trauma informed perspective. Trust is so important as these people have been let down so badly by services so a focus on attachment and engagement essential, and not to necessarily expect things to happen quickly, trust can take a long time to build

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

d/k

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

LGBTQ+
People with cognitive impairments (traumatic brain injury or alcohol related brain damage) and learning disabilities.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

see page 1

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

Not my field

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

d/k

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

yes

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

d/k

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

d/k

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

d/k

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

d/k

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

d/k

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

D/k but feel strongly that health boards and social services should be audited on their compliance as currently often declining to work with this population

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

d/k

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

d/k

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

d/k

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Just to say I have not had the opportunity to read the whole document so my comments are related to the health section and my experience in the field- please recognise them as such

Response 16

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

I do think they will help move in the right direction. However there are deep structural issues which need addressing at the same time, if not before. E.g., economic issues, inaccessible PRS, increased reliance on services.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes, although this will put increased strain on some LAs. E.g., those with secure estates. I also think there is a risk that non familial connections could be falsified and used to manipulate services. We would have to be careful and have robust guidelines as to the verification process for this.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

Homelessness is not just a housing issue. If prevention as well as rare, brief and unrepeatable homelessness is going to be achievable, it needs to be a multi agency consideration and responsibility.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Yes

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Yes

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Better pathways. I would suggest something is developed by WG and implemented nationally to ensure fairness and consistency. Staffing may be difficult as they would need to have an enhanced knowledge of the HWA (or new act whatever that may be called) as well as their own health related expertise.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Cae co-ordination and multi agency involvement is the only way we will be able to help the individuals most in need.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

N/A

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

I disagree. I think this is contradictory to your proposal that 16-17 year olds should only be placed in supported temporary accommodation options. If they are not viewed to be able to live alone temporarily why should they, as children, be expected or encouraged to hold a contract.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

Unintended consequences that homelessness is a pathway to housing.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

We should certainly give people choice. However, by placing people in immediate housing need this surely cannot be viewed as effectively ending homelessness.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

Robust guidance, and real hands on support from WG to achieve a shared vision.

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 17

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

We think that the proposals could lead to increased prevention and relief of homelessness if: they are resourced adequately including tackling the lack of housing - councils buying back housing and building more housing stock

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

We have identified that available housing stock can be under utilised: a single person in a two or three bed property, for example, penalised by the bedroom tax and getting in to debt. In instances like these such properties are being blocked that could be more suitable for people who would utilise all the space. We would advocate for legislative action on this issue.
Homeless prevention officers liaising actively with hospital discharge, prison leavers and veterans and a dedicated role mandated for local authority.
Given that 1 in 4 people who experience homelessness are care experienced, we would like to see transitional support mandated by legislation to prepare them better for independent living together with mental health support.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes. We have some concern that more desirable areas of the country may experience more pressures. If the need arises we should be open to imposing certain limits.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

More and better co-ordination of support would be of clear benefit.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Yes, but we would want to see co-ordination to include local and National third sector organisations be included in this co-operation such as Citizens Advice

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Yes. We particularly welcome the proposal to ensure that key assessments and plans routinely consider housing needs and the commitment to ensure that no one is discharged from hospital into homelessness. We are concerned that these requirements are also applied to private healthcare providers, who should have the same duty of care.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Training skills, more staff, better locations and funding for the other organisations

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

These proposals will strengthen the learning for each service, the greater the level of co-operation the better the outcome of the individual is likely to be

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Elderly people. Our local authority is a retirement area so we have many pensioners living here. The age at which older people are eligible for accessible housing was reduced from 65 to 50, which, given how long people are living, has placed more strain on resources.

We have concerns about victims of modern slavery who are not mentioned in the white paper.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Those incarcerated should be supported in applying for benefits and suitable accommodation before leaving prison as part of the assessment around possible homelessness

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

If 16 and 17 year olds are able to be contract holders this would have the benefit of giving greater independence for those without parental support
Consequences that may need to be mitigated are around the greater levels of support that will be required, through youth services, social services and tenancy support services.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Improved communication between the teams and better understanding of the respective roles and responsibilities of each agency

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Yes but for all of those under 25 additional tenancy support should be offered by a dedicated agency. This could include support in the form of providing a guarantor as well as all of the associated personal administration.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

We fully support the existing proposals.
We suggest that if shared accommodation is to be abolished then the shared accommodation rate of the LHA needs to be adjusted to reflect this.
We would welcome more clarity with regards to what constitutes 'reasonable travelling distance' from facilities, including medical.
More suitable accommodation available is key. Without this increased availability the staff rolling out these proposals will be unable to fulfil the requirements that they are there to ensure

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

In terms of the removal of people from the list who no longer need a property we feel that there are unlikely to be high numbers of people who fit that criteria.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

Broadly we agree with the proposal. We do have concerns however about women in difficult relationships (not necessarily DV) who may be pressured to return home to get them off the list

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

We strongly feel that the proposals outlined will support implementation particularly the potential for greater powers for Welsh ministers to challenge and direct improvement

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

We would advocate for a published report from each local authority annually to demonstrate how they are implementing these proposals and delivering outcomes.
A survey of third sector partners and feedback from them would also help.

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

There is the potential to negatively effect Welsh speaking communities by diluting the Welsh character of an area by moving people into an area who are English speaking, but with a connection to an area that is predominantly Welsh.

Taking into account the Welsh language in the decision of where to place people will be crucial and the White Paper makes no mention of this so far.

A strong and robust welsh language policy will be necessary across all social and community landlords.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 18

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

In terms of Veterans addictions and several other groups the actions need to be addressed several steps before a person is made homeless

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Yes more responsibility on person to complete different courses to support difficulties people with behavioural issues may have at an early stage ie dependency, aggression and violence mental health

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Prevention ie what's is behind the homeless

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

As previous nhs police third sector can feed into alerting that someone could be heading towards homelessness

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 19

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

Local authorities will be required to work with households who are at risk of homelessness earlier and they will have a duty to assist more with temporary accommodation. Social housing providers will be required to rehouse more homeless applicants and be transparent around their lettings via CHR/CAP.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

More resources are required for Rent Smart Wales and Local Authorities to regulate/monitor and enforce Rent Homes (Wales) Act i.e. property standards; contract compliance and notice periods.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

There is a greater opportunity for early intervention from the LA's Housing Options Team if multiple bodies have responsibility to identify, refer and cooperate. There is also the opportunity to refer households who may be unaware of the LA's homelessness duties and may otherwise have not sought help or have only done so in a crisis situation.

The duty to cooperate is key as households are presenting with increased vulnerabilities and complexities, a partnership approach is vital to take a much more holistic approach and to ensure all relevant agencies are sharing information around the table.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

We feel that all voluntary specialist organisations providing services to homeless people e.g. substance misuse and mental health charities should be included in the list as this type of support agency would be invaluable to assist with early identification, referrals and also would be beneficial to have cooperation with during multi agency meetings. The list could be extended to all organisations receiving Housing Support Grant.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Yes, it is important that other professionals have a responsibility to recognise homelessness and refer this to the LA. However, it would be important to clarify exactly which health professionals had this duty to report to avoid confusion and duplication e.g. A&E Depts, GP's; Health Visitors, etc.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Relevant agencies would need to be aware of the scale of homelessness in Wales and receive training regarding the links between their agency and homelessness. In addition, "selling" the benefits" to each individual service would be essential along with sharing the figures relating to the cost of homelessness on other services. Operationally the links between Health and Housing could be strengthened with a

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

greater understanding of roles and the benefits of joint working. Guidance on best practice for the duty to cooperate could be shared with all sectors involved to ensure everyone is aware of their responsibilities and how to refer.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

We feel this would be invaluable due to the complexity of many of the homeless households presenting. Involving all relevant agencies at an early stage would enable them to share relevant information and provide holistic solutions.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Targeting Housing with Care Fund (HCF) funding for developing supported housing and link to revenue funding to provide care and support services for homeless individuals with complex and specialist needs. There is an over-reliance on using general needs housing with minimal floating tenancy support, which can lead to tenancy failure and repeat homelessness. In addition, more resources are required to ensure that all landlords in Wales comply with the requirements of RHWA in relation to FFHHS property standards. A review into the effectiveness of Housing First projects should also be considered to highlight best practice and return on investment.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

Increasing the supply of supported housing specifically for young people including the provision of appropriate revenue funding for support services.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

We feel that young 16/17 year olds should be supported by Social Services with the PHP agreed between both LA Housing Options Teams and Social Services. Where necessary, support should be available 24/7 and not just during office hours.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

We are concerned with how this would align with Contract Law whereby an under 18 year old cannot be responsible for a legal contract. Currently, 16/17 year olds are offered a Contract In Trust which converts to a Secure Contract on their 18th Birthday. This proposal would remove the need for the guarantor (which is frequently the Social Worker) and removing this requirement could increase the risk of tenancy failure.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

In principle we agree, however, this may be a challenge for some LA's due to costs and lack of supply in the locality. We are aware that some LA's use HMO's as an alternative to B&B. This proposal would reduce the amount of temporary accommodation available and increase costs for the LA. The proposal to house all under 25's into supported housing will be challenging in Monmouthshire due to the lack of supported housing in the County. The number of under 25's with a homeless duty currently far outweighs the supply of supported accommodation. With regards to the individual staying in supported housing until they are ready to move on, some individuals may not be ready for years which would restrict the flow of tenants through this type of temporary accommodation. The proposal to not place families in overcrowded conditions may also be challenging where very large families have a duty accepted and

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

there is no suitably sized temporary accommodation available. We agree this situation is not ideal, however, there may be occasions where this is the only option locally. Personal circumstances such as being accommodated with a pet, or being placed in accommodation that will support their recovery from substance use are again ideal however, given the lack of choice of temporary accommodation currently available to the LA, we suspect this will not always be possible. Formalising a homeless at home scheme may have the unintended consequence of parents asking their children to leave once they reach 18 feeling confident that the LA will allow them to stay in the parental home until a suitable property is found.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

In principle, we agree with the statement that social housing should be for households unable to afford to privately rent or buy, however, the calculation used to make this determination needs further consideration. This is because current private rent levels are used to calculate the upper limit for those 'unable to afford private rented', however, the reality is that when this property become available for re-let, anecdotally, the rent will usually increase considerably. The consequence of using this calculation is that often families with children may be put into the 'able to afford to privately rent' category, when in reality, private rent (and the lack of LHA to cover this rent) may push these households into poverty. The sustainability of new developments may be placed in jeopardy if all allocations are to homeless applicants and those falling into the very low income category. Cohesive communities require a mix of households of different demographics to thrive. We would welcome more clarity and guidance regarding the appropriate use of exclusions and suspensions from the Housing Register. Failure to do this, could have multiple negative impacts on both the community and the RSL. The proposal to prevent applicants with no housing need from applying to the register is positive. The amount of resource required to administer the waiting list may be reduced as a result. Implications of this are that you would either need to manually assess each application to ensure the applicant does not have any housing need or pay for an automated system to do this for you. Applicants refused entry to the Housing Register may subsequently appeal/complain resulting in further work for the LA. Assigning additional preference to homeless households with a duty above all other households would impact the ability of the housing provider to create sustainable communities and will also have a detrimental impact on groups such as those currently ready to leave supported, disabled applicants unable to manage in their current accommodation, tenants under-occupying family housing who are willing to downsize or overcrowded households. We feel there still needs to be a balance between the lets allocated to homeless households and other households also in high housing need. We feel it is imperative to allow existing social housing tenants to transfer when their property no longer meets their needs as this makes best use of the social housing stock and releases a property to be let to someone on the Housing Register. The proposal to introduce legislation to require the use of CHR's is positive as it enables one route of access into all social housing in an area and when accompanied by a Common Allocations Scheme ensures that all social landlords are allocating in accordance to the LA's agreed priorities. This also gives greater transparency to applicants on the Housing Register. We agree that a 'deliberate manipulation test' is a positive approach although it would be helpful to have some standardised guidance to apply this. It would be useful if this was administered earlier in the homeless application process to prevent any delays to allocations whilst an investigation is taking place.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

We agree with this proposal, however, there is not enough Social Housing available to accommodate current or future levels of homelessness. Therefore the timing of abolishing priority need and intentionality needs to be considered otherwise further pressures will be placed on LA's and inhibit their ability to provide suitable temporary accommodation.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

Ultimately, the proposed reforms will increase the numbers of homeless households that LA's are required to assist and without additional resources they are unlikely to be able to meet these proposals. Therefore, timescales to implement the changes will need careful consideration and be supported by an increase in resources.

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 20

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

lack of social housing due to council house sell off and housing associations cherry picking tenants with large incomes

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

rent controls on private rents as they are out of control
more regulation of letting agencies and private landlords as they discriminate against homeless people

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

yes broader the better

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

?

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:
cooperation is essential in a society

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

more social housing

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

rent controls

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

yes

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

another layer of bureaucracy ?

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

utilise empty buildings , confiscate from owners

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 21

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

The abolition of priority groups is the most progressive step, but also the introduction of several pragmatic measures to make the legislation more deliverable.

The removal of the intentionality test is also welcome.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

We feel the legislation should completely remove the local connection test and the requirement for a local connection.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No we feel the local connection requirement should be completely removed.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Not possible to say.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

It is hard to see this happening without this being a statutory duty. However, we consider this will contribute to homelessness being rare, brief and unrepeatable.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

The list looks comprehensive.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Homelessness services and health have never enjoyed the cooperation and harmony that can be seen in other countries. The white paper is a good start, but success will depend on the cultural change in those organisations rather than legislation.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

One possibility could be the creation of specialist workers based in 3rd sector housing and homelessness organisations dedicated to working alongside statutory ones. For example, experts in the housing and homelessness field could be based in GP's A&E or Social Services Teams.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

This is theoretical, so it is impossible to answer. But provided the planning investment and infrastructure are put in place, it should make a considerable difference.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Agree

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

Agree

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

Agree

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

The proposals appear to be sound.

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

Work more closely with umbrella and representative bodies.

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 22

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Make it harder for people to lie about domestic abuse and child abuse in order to get cheap/free housing (it happens a lot); provide holistic support to people and get them in employment, encourage them to find different accommodation once they have stable income, so housing spaces are free for those who really need them and cannot work; actually support people with their living costs instead of increasing council taxes and freezing income tax thresholds; stop sitting on empty council properties for years and get rid of your corrupted contractors that overcharge you for simple repairs.

Most importantly regulate the renting sector! As it stands someone on £50k salary needs a guarantor who is home-owner on £25k - makes no sense - they have less income and more financial commitments. If you do not have one you have to pay an unregulated amount of deposit/rent advance for first/final rent payment - that prevents many people from renting and they face homelessness as a result.

I have been asked for anything between 3 and 12 month rent for a single bed flat. That's between £2000 and £8000 minimum . If you do not have money to pay - you will be effectively homeless if you are asked to move or need to. Most recently I had to take a loan of £2000 to cover advanced rent and "last two months of tenancy" - on two months notice, money not protected as it is not deposit I am about to lose £1300. Landlords increase rents unreasonably. I was forced to move by 20% increase in rent (£200) with a month notice on a property that was not even on mortgage anymore. Current policies and lack of regulation and not -treating landlords as business owners and taxing them appropriately is encouraging the housing crisis and homelessness.

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

People should be housed where there is space regardless of their preference.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

anyone who is single and renting in unregulated sector - you lose your job - you are done. There is no support

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Regulate the rent sector

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

Depends on the situation. If "abuse" has occurs - were the abusers actually found guilty. When you consider housing, there is often priority given on the basis of false allegations. What were the reason behind homelessness?

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Generally not; at that age bracket kids will be better supported into work, and rented accommodation, provided they are able to work and not disabled for example. Keeping them in social housing will add to a longer term problem

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

YES absolutely. If they are old enough to work, they are old enough to rent.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Generally, as far as I am aware there is no limit to how long people can live in social housing/council homes. People should not be provided with council homes/social housing indefinitely. Consider a limit to this. While there are some cases where it may be needed long term, a victim of DV for instance who had a 13year old, will likely have settled into work and rebuild their life in 3-5 years, and the child will be an adult if "support services" have done their job... At this point housing should be reassessed and if a significant need is not shown, people should be supported to move to private renting, and social accommodation freed for those in need.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

You have "housing crisis" as many people are ending up homeless, because they can't afford to buy, while people are getting the right to pay council homes, funded by tax payer benefits. You are building a system that creates more homelessness not less.

Response 23

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

We have underfunded and pressured services in Wales. Making these changes will require increased resources and work which councils will not be able to provide due to cuts and pressures. Also, it states that if someone is at fault for needing to leave their home, they are currently not rehoused - by taking this rule away, you are taking away the person's accountability and this will cause further pressures as people become 'untouchable'.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

1. Make people accountable. Their fault due to an eviction, possibly one chance but then if repeated, they are not housed.
2. That HMOs are changed. These are sticking plasters over the housing crisis and often bring further issues of people living together and sharing facilities.
3. Private landlords have limited profit.
4. Councils do not pass planning proposals just to relieve their homeless problems.
5. Welsh government are not able to overrule these decisions by councils.

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Insufficient funding as a whole.
Funding for acquirement and regeneration of long standing empty/abandoned buildings for development by social housing into suitable contained accommodation.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No

Please give your reasons:

Unable to read this part due to time constraints

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Unable to read this part due to time constraints

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Unable to read this part due to time constraints

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Unable to read this part due to time constraints, but will say that robust long term funding is required.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Unable to read this part due to time constraints

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Unable to read this part due to time constraints

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Unable to comment due to time constraints

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Unable to comment due to time constraints

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

Unable to comment due to time constraints

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Unable to comment due to time constraints

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Unable to comment due to time constraints

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Unable to comment due to time constraints

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Unable to comment fully due to time constraints but there needs to be an overhaul of HMO development in Wales as this is a sticking plaster and not addressing the real issues of homelessness.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

Disagree. There is a huge amount to unpick here. Disabilities and the vulnerable should have priority and there should be more suitable homes being created in abandoned buildings or areas for redevelopment and stop building on green areas. I can see consequences of just 'bunching people together' in unsuitable accommodation to get numbers down and pressures on other services increasing.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

Unable to comment due to time constraints

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

Unable to comment due to time constraints

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

Unable to comment due to time constraints

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

Unable to comment due to time constraints

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Unable to comment due to time constraints

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

Unable to comment due to time constraints

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Unable to comment due to time constraints

Response 24

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

About Us: NYAS Cymru work to protect, support, empower and safeguard every child and young person who we come into contact with by providing advocacy services. We campaign on behalf of care-experienced children, young people and adults in vulnerable situations to create systemic change to protect and advance their rights.

End Youth Homelessness Cymru (EYHC) is a national coalition led by Llamau, an organisation whose mission is to eradicate homelessness for young people and vulnerable women. Chief Executive of NYAS Cymru, chairs the EYHC sub-group to end youth homelessness for care-experienced children and young people.

NYAS Cymru's response to the White Paper specifically focuses on how Welsh Government's proposals may impact care-experienced young people and care leavers across Wales.

NYAS Cymru is grateful for the opportunity to respond to the Welsh Government's White Paper on Ending Homelessness in Wales. We partly agree these proposals will lead to increased prevention and a relief of homelessness, although we strongly urge Welsh Government to reconsider its priority need proposal. We welcome that the majority of the Expert Review Panel's recommendations have been taken forward by Welsh Government in this White Paper.

NYAS Cymru agrees with the following proposals in Chapter 1 of the White Paper:
Personal Housing Plans (435): NYAS Cymru supports the positive proposals Welsh Government has put forward in relation to Personal Housing Plans. The proposed duty to carry out a needs assessment and Personal Housing Plan with a person at least six months prior to release and in person should decrease the number of people who experience homelessness after leaving custody. With a high percentage the prison population estimated to be care-experienced and more than one in four of all young homeless people estimated to have been in care, this is an exceedingly at-risk group. (p. 112)

The meaning of 'homeless' or 'threatened with homelessness' (55-68): NYAS Cymru welcomes the changes to the meaning of 'homeless' or 'threatened with homelessness'. Changing the definition of being threatened with homelessness if an individual is likely to become homeless within six months is far more realistic than 56 days, and promotes early intervention.

Intentionality test (135-148): NYAS Cymru is delighted with Welsh Government's proposal to remove the intentionality test from legislation for care-experienced young people, and for it no longer to apply in determining whether an applicant is entitled to the prevention and main duties or any future duties in new legislation.

NYAS Cymru believes that the following proposals could be strengthened in Chapter 1 of the White Paper:

Priority Need (105-134): NYAS Cymru does not agree that the priority need test should be abolished.

The priority need test plays too great a role in determining which households would be accommodated and which households would not. NYAS Cymru has worked with many care leavers experiencing homelessness who have been housed far quicker by accommodation providers because of priority need

Q2. What are your reasons for this?

status, and is concerned that abolishing the priority need assessment would place more care-experienced young people in vulnerable situations. Welsh Government's proposal in Chapter 3 of its White Paper that care-experienced people should be considered priority need unless the test is abolished is evidence that priority need can be vital in making sure that care-experienced young people have a roof over their heads.

Although Welsh Government's proposal to abolish priority need would in part ensure equality for all homeless people, there is a real risk that care-experienced young people would be placed in vulnerable situations because of the chronic lack of affordable and suitable housing in Wales. With 1 in 3 care leavers become homeless in the first two years of leaving care, the priority need category can be an extremely beneficial status for care leavers, given their very high risks of being street homeless. A's story highlights that in Wales, we are not at the point where affordable and suitable housing exists:

A is 19 years old and spent her teenage years in care. When A became pregnant and her unborn child subjected to child protection, she was referred to NYAS Cymru's Project Unity service. This vital service helps care-experienced young women navigate their journey to becoming mothers and child protection proceedings.

When A's relationship broke down due to domestic abuse, she had to flee her home at 34 weeks pregnant for her safety. With no refugee space available in South Wales, A would have had to travel one hundred miles to North Wales to be housed. This was not a journey A felt able to make in the very late stages of her pregnancy, which would have taken her far from the support of her sister and local health board.

NYAS Cymru's Project Unity team supported A to make a request for accommodation from her local authority. When A's local authority responded, they told her that she was not a priority, despite being her corporate parent. When stressed by the Project Unity and Shelter Cymru that A was heavily pregnant, the response from the local authority was that the baby was unborn and they had nowhere to accommodate her.

A was told at 34 weeks pregnant by her local authority that her only option for the night was a tent, and to come back tomorrow. As NYAS Cymru were unwilling to see a pregnant young woman living in a tent, A was accommodated in a hotel for one night. She then had to stay on her sister's floor as no beds were available.

Only after seven days A was found a hostel to stay in, where she remained until her baby was born. A's local authority then assessed her as living in unsuitable housing for her baby to remain with her. Upon birth, A's baby was removed at birth to a foster carer. To this day A is still waiting on a flat.

Whilst we should continue to strive towards a system where no care leaver is homeless, the reality is that they are often in more vulnerable situations than their peers that places them at higher risk of homelessness. The priority need status is a much-needed safety net that differentiates care leavers and acknowledges the extreme likelihood of them being placed in vulnerable situations.

Code of Guidance (57): The Code of Guidance for local authorities sets out when it might not be reasonable to occupy accommodation. NYAS Cymru welcomes that the current Code of Guidance includes a list of interventions that a local housing authority ought to have in place as a minimum set of available interventions. (29) However, we believe that in the cases of outright possession orders – that landlords can apply for when they want their tenant(s) to leave – the Code of Guidance should emphasise how serious the behaviour of a tenant must be to result in one of these orders. This is Recommendation 63 in the Expert Review Panel's review.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Emergency Prevention: NYAS Cymru believes that community hosting provision should be increased across Wales as an option for care-experienced young people facing or experiencing homelessness. Welsh Government must work to achieve parity of provision across Wales so that such vital wrap-around support is available for young people and host families across the country.

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Local connection test (149-181): Yes – NYAS Cymru is pleased that people who are care-experienced and who are not accommodated under social services duties have been included in the list of exceptions to allow for non-familial connections with communities. The Welsh Government has recognised that friendship networks can often play the same role of families in care-experienced people's lives.

In the 'Don't Let Me Fall Through the Cracks' report by End Youth Homelessness Cymru, young people said they were declined local connections to areas they had been placed in and felt settled. Additional flexibility regarding local connection rules would allow a care-experienced young person placed out-of-county to have the area they have been placed in considered as an additional 'local connection' when moving on. This would enable young people to live close to support networks and reduce loneliness.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

NYAS Cymru welcomes the publication of a full Regulatory Impact Assessment to accompany any proposed Bill that will draw on evidence emerging from the consultation. We look forward to responding to the full Regulatory Impact Assessment when released.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

NYAS Cymru supports the proposed duty on specified public authorities and any other authority carrying out functions of a public nature to identify those who are at risk of homelessness, refer, and co-operate as is appropriate.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

NYAS Cymru partly agrees with the proposed relevant bodies to which the duties to identify, refer, and co-operate would apply.

The proposed relevant bodies that should be added to the list are detailed below.

Education (228): NYAS Cymru calls for Welsh Government to specify that higher education organisations and head teachers of schools, pupil referral units, youth services, looked-after children education coordinators and principals of further education colleges should be subject to this duty. It was recommended by the Expert Review Panel to include this cohort relevant bodies but was not taken forward by Welsh Government.

This is due to recent commitments made by Welsh Government in relation to “reducing workload and bureaucracy for school staff”, specified in paragraph 228. Further work has been promised by Welsh Government is to “undertake further testing and workload impact assessment in order to assess the viability of inclusion of schools, pupil referral units, further education and higher education establishments in the list of relevant bodies.” NYAS Cymru argues that this scoping exercise is not a productive use of time since the benefits of including these services for young people at risk of homelessness is already clear.

NYAS Cymru supports the work taking place with local authorities to strengthen and adapt their successful early identification systems to account for additional risk factors and indicators associated with youth homelessness through the refreshed Youth Engagement and Progression Framework (YEPF) (209). However, exploring how education aligns with the YEPF is not as strong as placing a duty on education bodies directly.

We are aware there are excellent examples of projects and services working between the youth work sector and schools to determine early intervention of risk factors of homelessness and working with young people to reduce the risk of homelessness. Llamau operates a scheme with schools whereby youth workers work with teachers to identify young people at risk of homelessness and then work with students on a one-to-one basis to provide support, advice, and information. NYAS Cymru would like to see similar practice continue consistently across all of Wales to reduce the risk of homelessness amongst young people.

Providers of asylum accommodation (233-234): For people with no recourse to public funding, challenges remain because of the UK Government holding legislative power over immigration. NYAS Cymru is therefore very supportive of Welsh Government’s proposal that at the point an individual is notified that they have been granted leave to remain when living in an asylum accommodation, they should be deemed to be threatened with homelessness once the 28 day notice to quit is served. More can be done to help this cohort, so NYAS Cymru supports Welsh Government’s aim to work to explore a range of mechanisms with UK Government as outlined in the White Paper.

Private Landlords (235-237): The Expert Review Panel emphasised that private landlords play a key role in identifying where a person is or may be at risk of becoming homeless, and recommended non-legislative measures which could assist in improved collaboration. NYAS Cymru is disappointed that

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Welsh Government have not proposed mechanisms by which private landlords could be encouraged to participate in the duty to identify, refer, and co-operate by placing a private landlord under a duty to refer tenants at risk of homelessness to a local authority. Welsh Government should be impatient to act on this issue, and waiting for a review of this proposal as part of the ongoing review of Rent Smart Wales demonstrates an unwillingness to act quickly.

Antenatal Care Services: NYAS Cymru welcomes that in relation to the duty to identify, refer, and co-operate, Local Health Boards including primary care have been recommended by Welsh Government. A responsibility to identify, refer, and co-operate will allow health professionals as the first point of contact for people at risk of or experiencing homelessness to be more trauma-informed.

We call for antenatal care services to be included within the duty to identify, refer, and co-operate as there is a high risk for this cohort to be at risk of or experience homelessness due to intersectionality. NYAS Cymru's 'Trust Us to Care' campaign seeks to break the cycle of children of care-experienced mothers being taken into care, and many of these young mothers are at risk of or experience homelessness. NYAS Cymru surveyed care-experienced young mothers and found that 1 in 3 found out they were pregnant from midwives.

Youth Services: NYAS Cymru recommends that youth services are included within the duty to identify, refer and co-operate. The number of young people engaged in youth services in Wales is increasing, with over 83,000 11–25-year-olds registered as members of statutory youth work provision in the year 2022/23, an increase of 21% on the previous year according to Welsh Government. With more young people now in youth work spaces, it is vital that services are provided with the right means and responsibilities to identify and notify relevant partners if they believe a young person is at risk of or currently facing homelessness. Extending this duty to youth services would also strengthen the Welsh Governments ongoing work in this sector, which NYAS Cymru welcomes and supports.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

NYAS Cymru believes that the right balance has been struck between legislative requirements and operational practice, particularly in relation to health.

From an operational perspective, it is vital that Welsh Government release guidance on what the duty to identify, refer, and co-operate means for practitioners. A child-friendly and easy-read versions of guidance on this duty should also be created, similar to those included as part of this White Paper.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Youth Homelessness data (647-648): In 2022-23, care leavers aged 18 to 21 years old were placed in temporary B&B accommodation under the current homelessness legislation on 171 occasions. This is a figure that has risen since the start of the COVID-19 pandemic.

Yet the true extent of youth homelessness is not clear though the data available. As the data only records the numbers of young people who have presented to local authorities as experiencing homelessness, young people who experience hidden homelessness fall through the cracks. Another issue is that 16- and 17-year-olds are grouped together for the purposes of homelessness data, with there being no

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

differentiation between those who are in care and those who are not.

The data does not distinguish between the local authorities who use B&Bs as a last resort compared to the local authorities who use B&Bs more routinely. Finally as the Children, Young Person, and Education Committee have raised, there is no routinely published data on care leavers facing homelessness.

It is not enough for Welsh Government to say it will work to improve continuous data collation across the housing and homelessness sector. NYAS Cymru support the End Youth Homelessness Coalition's stance that a uniform national data-recording template should be mandated by Welsh Government to be completed for all care-experienced young people who present as homeless.

Recording numbers of presentations i.e. "care leavers or persons at particular risk of sexual or financial exploitation, 18 years or over but under the age of 21" is too imprecise, and gives no real insight into how many care-experienced young people are made homeless in Wales, meaning that our abilities to respond appropriately are limited.

Temporary accommodation data (521): NYAS Cymru welcomes Welsh Government's commitment to ensure at both a local and national level that they are able to profile the availability and stock of temporary accommodation.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Enhanced case co-ordination (248): NYAS Cymru believes that the statutory case co-ordination approach will assist in preventing homelessness amongst this group to a certain extent. We believe that the lead professional assigned to this role should vary depending on the specific needs of the individual at risk of or experiencing homelessness. NYAS Cymru looks forward to reviewing further guidance in relation to the case co-ordination approach.

Regional multi-agency approaches (249-50): Each care-experienced young person experiencing homelessness should not be regarded as normal. It should be recognised and treated by professionals as a major systemic failure.

A multi-agency review should be undertaken any time a care-experienced young person up to the age of 25 presents to a local authority as homeless or at risk of homelessness, as recommended in End Youth Homelessness Cymru's 'Don't Let Me Fall Through the Cracks' report. This recommendation was supported by social care and housing within the Welsh Government and a letter was sent to each Head of Children's Services in each local authority. However, we are yet to see any evidence of this being rolled out across the whole of Wales. We would recommend for this to be a National Practice Standard that is included in the ongoing National Framework work being completed by the Welsh Government as part of the radical reform of services for care-experienced young people.

The young person and their views, wishes, and feelings must always be at the center of the meeting and led in a format that suits them. This meeting should make sure that the young person gets the help they are entitled to and address what led to them being homeless, what can be done to prevent this from happening in the future, and what plans are now in place to support the young person's holistic needs. This could be achieved though young people being offered the opportunity to attend reviews to communicate their views themselves or connected with an advocate through the active offer to speak on their behalf.

Importantly, the meeting should also serve as a learning opportunity for learning for all relevant partners

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

to ask themselves key questions, such as what happened and how the young person managed to slip through the net to prevent similar situations from occurring.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

NYAS Cymru welcomes the publication of a full Regulatory Impact Assessment to accompany any proposed Bill that will draw on evidence emerging from the consultation. We look forward to responding to the full Regulatory Impact Assessment when released.

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

NYAS Cymru is pleased that Welsh Government has prioritised care-experienced young people as a group who is disproportionately affected by homelessness.

Care-experienced young parents are another group who NYAS Cymru believes to be disproportionately impacted by homelessness and housing instability. NYAS Cymru's Project Unity service supports pregnant women and young parents with care experience to access practical and emotional support and navigate complex child protection proceedings. And the service has taken referrals from 19 of the 22 local authorities.

NYAS Cymru's Project Unity worked with over 190 young women between April 2023 and January 2024. Out of these young people, 70 (37%) were at risk of homelessness or found themselves homeless having to sofa surf. Often care-experienced young mothers are likely to face additional vulnerabilities in comparison to their peers. NYAS Cymru strongly recommends that there must be a priority to house these young people in Wales.

The Unity team and external agencies have identified the need for referrals to be made to Project Unity earlier on in the pregnancy when concerns are first identified by the local authority. If young women were referred earlier to Project Unity, they would be able to work with the service for longer before the formal court procedures begin, when it is often too late for the young woman to have a "fighting chance". As most referrals to Project Unity come from local authority children's services, the change starts there.

The Welsh Government should set out statutory guidance for local authorities, including an 'active offer' of support from Project Unity is offered to care-experienced young women as soon as their pregnancy is noted. This can be achieved through the National Practice Framework being developed by the Welsh Government.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Local Housing Allowance (279): It was a promise by Welsh Labour within their 2019 manifesto to work with a UK Labour government to “tackle some of the wider causes of homelessness, including raising the local housing allowance.” NYAS Cymru is delighted that since the publication of this White Paper and in large part because of Welsh Government efforts, UK Government plans to increase the local housing allowance rate to cover the lowest 30% of rents from April 2024. Restoring the Local Housing Allowance rate will result in an additional £24 per week in housing support for means tested benefits, according to Policy in Practice.

However, the under 35 shared room rate is still the lowest allowance. This is problematic because the lack of move on accommodation combined with unaffordability can leave them in unsuitable and unsafe shared temporary accommodation, as highlighted to Welsh Government in a report to the Expert Review Panel. NYAS Cymru believes Welsh Government should specifically make the case for raising the Local Housing Allowance rate for the under 35 shared room rate as part of upcoming discussions concerning the local housing allowance freeze from the end of the 2024/25 financial year.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

NYAS Cymru advises that Welsh Government updates the Social Services and Well-being (Wales) Act 2014 to incorporate the corporate parenting extension of duties to other bodies including housing, health, and education. This duty must be mandatory for all named bodies. It is crucial that housing in all 22 local authorities across Wales becomes the corporate parents of care-experienced young people to make sure that no care-experienced young person falls through the cracks. An annual action plan should be produced by housing within Welsh local authorities to highlight the ways in which they shall take their duties to care-experienced young people and within legislation seriously.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

NYAS Cymru welcomes Welsh Government's commitment to strengthen existing corporate parenting to ensure individuals aged 16 and 17 years who are homeless or at risk of homelessness do not fall between services. We believe the following proposals could be added and strengthened to deliver broader corporate parenting responsibilities.

Corporate Parenting Charter: One way in which Welsh Government could deliver the broader corporate parenting responsibilities is to make its voluntary corporate parenting charter statutory. Published on 29th June 2023, the Welsh Government's voluntary Corporate Parenting Charter is a strong foundation from which to build systemic change for care-experienced children and young people, including care-experienced young mothers. We believe Welsh Government's list detailing which kind of public sector bodies, public service or professionals should take on the role of a corporate parenting is comprehensive and well-thought-out.

Yet although the Welsh Government has extended corporate parenting duties for other public bodies beyond children's services, it is voluntary for public bodies to choose whether they sign up to be corporate parents. The Welsh Government has promised to monitor sign-up for the Charter and consider future steps for corporate parenting in Wales, and indicated that the Charter has “initially been published

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

on a voluntary basis” only in its written response to the CYPE radical reform report.

By making corporate parenting mandatory for a broader range of public bodies, this would encourage other bodies to develop specific practices and work collaboratively to end youth homelessness. The Welsh Government should follow the Scottish Government’s lead and make fulfilling corporate parenting duties mandatory for named public bodies.

Inquiries into care status by local housing authorities (282): Local housing authorities should not be required to make inquiries into whether an applicant is care experienced. Multi-agency work and collaboration between services should ensure that the local housing authority already knows so young people do not have to disclose whether they are care-experienced.

The burden of evidence should not be on care-experienced young people when they try to access their entitlements, such as priority need status. Local Authorities have this data, so as corporate parents they should make it as easy as possible for care-experienced young people to access what they’re entitled to.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Yes, NYAS Cymru agrees that the Renting Homes (Wales) Act 2016 should be amended to allow 16- and 17-year-olds to be occupation contract-holders for both public and private rental housing. We recommend that young people are consulted with on this proposal.

Welsh Government must address the difficulties care-experienced young people can face in accessing these types of homes which require large deposits or upfront rent payments throughout the implementation of this proposal. A recent NYAS Cymru research report reported that care leavers across England and Wales have previously struggled to find landlords willing to rent to them because of their status as a care leaver. As one young person said:

“It was quite hard to actually get a landlord that would accept a care leaver because of all the things said about care leavers... he (landlord) wouldn’t deal with care experience.”

In addition, care-experienced young people told us that not having a guarantor – someone who agrees to pay their rent if they don’t pay it, for example a parent or close relative – can also make private renting inaccessible for them. Local authorities in England and Wales have a corporate parenting duty to care leavers, but this does not include a legal requirement to act as a guarantor.

We also know that some landlords also use care leavers’ lack of access to guarantors in a discriminatory way. As one care leaver said to us and I quote: “When you’re a care leaver everybody wants a guarantor, regardless of how good your credit history is.” Put simply, care leavers are more likely to need a guarantor, and more likely to not have one readily available.

Matt*, a member of NYAS’ Campaigns Advisory Group, is currently struggling with this issue. He says how difficult and “embarrassing” it is to have to explain to a landlord – often someone he’s never met – about why he cannot get a guarantor. One time after Matt explained his situation, the landlord responded with “well, can you not ask your parents?”

Until there is a statutory duty placed on local authorities to act as guarantors for care-experienced young people, access to private renting will remain unequal. Welsh Government should therefore consider amending the Renting Homes (Wales) Act 2016 to enable care leavers to access housing support under

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

a 'care leavers rent deposit and guarantor scheme' to strengthen its proposal for 16- and 17-year olds to hold occupation contracts.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

NYAS Cymru welcomes the publication of a full Regulatory Impact Assessment to accompany any proposed Bill that will draw on evidence emerging from the consultation. We look forward to responding to the full Regulatory Impact Assessment when released.

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Rapid Rehousing approach: NYAS Cymru welcomes and supports the Welsh Government's Rapid Rehousing approach and manifesto promise, which ensures that anyone experiencing homelessness can move into a safe and secure home as quickly as possible, rather than staying in temporary accommodation for long periods of time.

We believe the proposals can be strengthened further through the following recommendations.

Unsuitable temporary accommodation for under 25s (510): NYAS Cymru agrees with this proposal. Many care leavers have told us that this type of accommodation has made them feel unsafe, and this has negatively impacted on their mental health and well-being.

To strengthen this proposal, hotels must also be included as an unsuitable form of temporary accommodation. S who is 20 years old and supported by NYAS Cymru's Project Unity service, shared her experiences of being accommodated in a hotel whilst pregnant:

"I became involved in Project Unity when I was pregnant and homeless. At the time I was living in a hotel at 33 weeks pregnant. I was frightened and worried about what would happen to me and my baby, as there were people doing drugs and so much loud noise.

Although I had my own room, the shower was broken, and it was suggested I use the shared bathroom. I was so scared as the lock was not secure and I was constantly afraid someone would walk in on me.

While living there, I came back one day to find someone had been in my room. The security in the hotel were very unhelpful so I phoned the police. When the police arrived, they said that there was nothing they could do but did ask "Why are you living here? You should never have been put here."

Still living in fear, a few days later I thought my waters had broke, so I went out of my room to get help. Unfortunately the help that came was not safe and led to a very scary situation in which I feared for mine and my baby's life."

Fortunately, at this point, S had started working with NYAS Cymru's Project Unity service. S felt safe enough to voice her concerns to her Project Unity advocate and this led to them calling an emergency meeting with other key partners in S's local authority to find her alternative accommodation. S felt

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

empowered to voice her views, wishes and feelings and knew that Project Unity would make sure these were actively listened to:

“My Project Worker has been at the end of the phone when I have been scared, and she has helped me to be strong and say what I need to the people who I felt were in charge of me, such as housing and my Local Authority. My Project Worker supported me in moving and showed me that I matter. The Local Authority have now closed my case and I strongly believe that if it wasn't for Project Unity I would not be where I am today in my own property with my little family.”

Whilst S's story had a positive outcome, this is not the case for all young people placed in hotels as a form of temporary accommodation. S's story captures why hotels should not be considered as temporary accommodation and why Welsh Government's rapid rehousing approach must be prioritised.

Supported Accommodation (511-512): Whilst NYAS Cymru agrees with the proposal that young people in need of temporary accommodation must be placed in support accommodation, we believe an opportunity has been missed to strengthen guidance for supported accommodation in Wales.

NYAS Cymru does not believe that the information pertaining to support under current guidance - Landlords: housing law has changed (Renting Homes) - is clear or sufficient to make sure young people receive support tailored to their individual's needs. The guidance provides limited information about the role of community landlords, the support provided to young people in support, or how this accommodation is monitored by regulatory bodies. NYAS Cymru recommends for this information to be revised into its own supported accommodation guidance to make sure it is clear, robust and young person centered to best support individual and complex needs. NYAS Cymru recommends for community landlords to be specifically named as corporate parents in Wales as part of the Welsh Government's ongoing work into corporate parenting, which NYAS Cymru supports.

Secure locks: Too many care leavers have told NYAS Cymru that they have not felt safe living in temporary housing because their rooms have not had secure locks on them. This has left care leavers feeling scared for their own physical safety and worried that their personal belongings may be damaged or stolen. Making sure young people living in temporary housing feel physically safe must be a priority. NYAS recommends an additional proposal to be included in this approach whereby any accommodation that cannot be securely locked must be listed as an unsuitable type of accommodation and young people must not be placed here.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

NYAS Cymru agrees to a certain extent with the proposals around the allocation of social housing and management of housing waiting lists.

Power to remove people with no housing need from the waiting list (583-587): NYAS Cymru disagrees with this proposal. Whilst we recognise the proposal is intending to “increase accessibility to housing for those most in need” (p148), we are concerned that this may have unintended negative consequences by preventing individuals from accessing housing if they are not deemed to be in need. We are also particularly concerned about the consequences this proposal may have on care leavers, if it is brought in alongside the proposal to abolish the priority need assessment.

NYAS Cymru recommends that within this proposal, all care leavers must be exempt from being removed from waiting lists. This should be brought in alongside care leavers continuing to be considered as priority need for housing and accommodation.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

Additional preference (588-589): NYAS Cymru agrees with this proposal and welcomes the Welsh Government's plan to prioritise housing individuals in Wales facing homelessness.

NYAS Cymru recommends that if this is only intended to be a short-term policy change, there must be a robust and clear timeline for when and how long this is in place for. This timeline must be tailored to the specific needs of each local authority to make sure the policy does not end until all local authorities in Wales are in a stable position when they no longer need to allocate additional preferences. Local authorities must be provided with sufficient resources, funding and guidance to implement this proposal. There must also be sufficient support in place for priority groups who are not homeless during this period to make sure they are not disadvantaged as a result of the proposal.

Care leavers and people who are homeless as a result of fleeing abuse (590): NYAS Cymru agrees with this proposal and welcomes the Welsh Government prioritising care leavers within the White Paper.

In Wales, 1 in 3 care leavers will become homeless in the first two years of leaving care and 1 in 4 people experiencing homelessness in Wales have also experienced care. This proposal will reduce the number of care leavers in Wales facing homelessness by supporting them to access accommodation. NYAS Cymru welcomes that this proposal will also extend to people who are homeless as a result of fleeing abuse.

To strengthen this proposal, NYAS Cymru recommends a legislation change to the current priority groups to include care leavers and individuals who are homeless as a result of fleeing abuse. We believe that this change will benefit all care leavers and individuals leaving abusive environments to have better access to safe and secure housing, rather than just those who are homeless. Making this legislative change would also offer long term and sustainable benefits, as it provides an additional support intervention for people in vulnerable situations in need of housing.

NYAS Cymru does believe that this proposal must not be viewed as an alternative to the current priority need assessment. Care leavers and survivors of abuse must be provided with as much support as possible to make sure they can access safe and secure housing. Whilst this proposal will work towards this, it must be brought in alongside the current priority needs assessment.

CHRs and common allocations policies (591-594): NYAS Cymru welcomes this proposal. We agree that bringing in this legislation for CHRs will contribute to consistency in practice across all of Wales.

Should this legislation be brought in, NYAS Cymru welcomes that the Welsh Government will consider additional guidance to 'reduce the impacted of policies known to create barriers' such as historic rent arrears and guarantors.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

Proposal: We propose an increased range of housing options through which the main homelessness duty at section 75 HWA 2014 can come to an end.

NYAS Cymru partly agrees with the proposal for additional housing options for discharge of the main homelessness duty. The safeguards proposed to accompany the discharge options in relation to ending the main housing duty are positive and would strengthen housing rights across Wales. This is particularly in relation to the improved standard on ensuring placement in overcrowded accommodation is never suitable at the point of discharge of the main housing duty. To make sure that the improved standard is

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

embedded in practice, NYAS Cymru recommends that the Welsh Government carry out awareness-raising of the legal definition of overcrowded accommodation.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

NYAS Cymru welcomes the publication of a full Regulatory Impact Assessment to accompany any proposed Bill that will draw on evidence emerging from the consultation. We look forward to responding to the full Regulatory Impact Assessment when released.

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

NYAS Cymru is pleased that the Welsh Government has proposed bold reform regarding ending homelessness in Wales. We welcome that the youth homelessness grant for allocation to youth work will not be affected. Equally, NYAS Cymru is supportive of Welsh Government's decision to protect an increase in the Homelessness Prevention budget, despite the difficult decision to reduce the increase of £2m from a previous £5m in the indicative allocations.

The overall Welsh Government budget is worth £1.3 billion less in real terms since set in 2021. With local government and housing associations already stretched, it is vital that funding is guaranteed. This should not only rest on the Housing Minister securing sufficient funding in budget rounds. NYAS Cymru believes the right to adequate housing in Wales should be introduced. This means that Welsh Government would be empowered to use the maximum available resources, including finance, staff, and land to end homelessness. Regular progress reports would be scrutinised by the Senedd, and a level of budget security would exist for this vital area.

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

Corporate Parenting: NYAS Cymru believes that making corporate parenting duties mandatory in Wales would be an effective mechanism for holding authorities and public bodies accountable for their role in achieving homelessness prevention.

NYAS Cymru welcomes the proactive steps the Welsh Government has already taken to strengthen corporate parenting in Wales through the Corporate Parenting Charter published in June 2023. Signing up to the Charter is only voluntary for public bodies at this stage and without a mandatory duty to do so, public bodies will not have to take on corporate parenting duties if they do not choose to.

By making corporate parenting duties mandatory for all public bodies in Wales, this would ensure all

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

authorities - including housing, registered social landlords and accommodation providers - are proactively considering how to best care and safeguard care leavers who need to access safe and secure housing. Mandating corporate parenting then provides the Welsh Government with a means to monitor how well authorities are fulfilling their duties and hold them to account.

NYAS Cymru recommends this could be done through a monitoring system in which public bodies are legally required to submit evidence of how they are being good corporate parents to care-experienced children and young people bi-annually. A young person's committee should also be established so young people can give their views on whether a public body has been a good corporate parent. An independent monitoring body should be established to carry out inspections of whether corporate parents are fulfilling their responsibilities. Public bodies should be given a rating at each inspection, which should be made available for the public to view.

Timeline: NYAS Cymru is concerned that this White Paper does not have a clear timeline for when or how the Welsh Government intend to implement the proposed legislation to end youth homelessness in Wales. We believe that without a timeline, accompanied by targets and success indicators, it is unclear whether the proposed legislation will be brought in during the current Senedd term.

Wales has the highest rate of youth homelessness amongst all the devolved nations in the UK. Whilst NYAS Cymru welcomes that this White Paper is an ambitious plan for reducing youth homelessness, the Welsh Government must produce a tangible and clear timeline achieving legislative changes. We recommend for the Welsh Government to publish an implementation strategy for the White Paper proposals which includes a timeline for making legislative change, how success and progress will be monitored and who is accountable for this.

We also recommend that as part of the legislative changes, Welsh Ministers should set a new National Milestone under the Future Generation Act in relation to National Indicator 34, Number of households successfully prevented from becoming homeless per 10,000 household. Introducing a new National Milestone would offer an additional mechanism to monitor how all public bodies and the Welsh Government are progressing in their work to end youth homelessness in Wales.

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

NYAS Cymru welcomes the publication of a full Regulatory Impact Assessment to accompany any proposed Bill that will draw on evidence emerging from the consultation. We look forward to responding to the full Regulatory Impact Assessment when released.

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

A) Yes, NYAS Cymru believes that Welsh Government should consult the Commission for Welsh-speaking Communities in its consideration of opportunities to promote positive use of the Welsh language. NYAS Cymru believes that local authorities should focus recruitment efforts on making sure Welsh language speakers are available to conduct multi-agency reviews in Welsh with young people who prefer this.

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

B) NYAS Cymru is disappointed that neither the children and young people nor easy read versions of the consultation were published in Welsh. Guidance on upcoming legislation should be released in both languages so any young person at risk of experiencing homelessness can read it in the language that they're more comfortable with.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Q34. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 25

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

With regard to paragraph 92, I think the Welsh government should routinely collect data on the frequency, type, and outcome of reviews made by an applicant.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Re: paragraph 160, I would disagree with the assertion that individuals do not prioritise "service rich" areas". My experience of speaking to people with lived experience of homelessness and third sector organisations that support them indicates that areas that are known to have a good range of health and social care services are more attractive to people who are homeless.

Paragraph 152 explains that "There is no set period an applicant has to live in an area to be regarded as having a local connection". With this in mind, I would anticipate considerable regional variation in the implementation of the local connection test.

I do not agree with the proposal to keep the local connection test with the addition of additional groups. I

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

would encourage the Welsh government to speak with colleagues in Scotland where the local connection test has been abolished for people who are homeless. I am concerned that the suggestion that the groups listed in paragraph 166 be afforded "a more flexible approach" by local housing authorities will not be acted upon.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

I think that timely and responsive information sharing between relevant bodies is essential to preventing homelessness and ending it as quickly as possible where it does occur.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

With regard to paragraph 281, I strongly support the proposal that "no 16 or 17 year old should be accommodated in unsupported temporary accommodation and for those leaving social care or the youth justice system, it is expressly prohibited to use the homelessness system as a route out of care or youth justice". I think this reform will help to reduce the risks faced by highly vulnerable young people.

It will very important to ensure that accommodating young people who have left the youth justice system is done in a way that does not adversely affect the well-being of other vulnerable young people with whom they may be placed - for example, if a youth justice leaver is accommodated in a children's home, due care should be taken to ensure this placement does not adversely affect the other young people in the children's home.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Regarding paragraph 179, I think it would be sensible to record the number of instances in which an applicant is judged to be "unreasonably failing to co-operate".

Re: paragraph 180, I think that the wording "consistent non-contact with housing options services" is too ambiguous and will lead to disparities in service delivery. What's more, a person may display "consistent non-contact with housing options services" for reasons outside their control - e.g. being hospitalised or sectioned.

Response 26

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

I feel like in principle rapid rehousing is ideal but there just aren't the resources to make this possible at the moment. At Cardiff council as a prevention team we already assist people 6 months out from homelessness and we do prevent more than place in temporary accommodation but there is not enough housing for everyone to avoid that even when we and they are doing all we possibly could. I feel without the resources to make this possible and the relaxing of restrictions like priority need, there will be a long period in which the situation gets far worse before it can improve. If people can only access the council housing waiting list if they are homeless and intentionality consideration is removed, I believe more people will come through as homeless. The desire people have for social housing is exacerbated by private rented prices becoming extortionate.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

I think there should be priority placed on further regulation of private rental, for example, requiring additional registrations/ requirements for landlords with a certain number of properties, rental price restrictions, improvement of buy to let mortgages to reduce costs that need to be passed to tenants.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No, I personally don't really see the value of these specific exceptions to the individuals mentioned, however I am not completely opposed, I don't think this has the biggest impact on numbers coming through.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

I feel like the costs and benefits do make sense but there is not much consideration of impact on local and national Welsh government, funds etc

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

I do feel that it is correct that homelessness is not only related to housing and that having more input from other services could benefit a lot of service users

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

I agree and cannot think of any others in particular

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

I do feel in general for most of the proposal as a whole, there is not enough operational practice consideration for making sure services have the capacity and funding to provide what is being asked of them by the legislation.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

I feel that staffing and resources will need to be much higher to accommodate these duties, and probably more so than anticipated. I assume that there will be some learning and development needs, and these could possibly be aided by the local authority, but this would in turn increase staffing and resources need on local authority side.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

I feel that if possible to accommodate, this would really help. We already have rapid rehousing projects focused on single people in this group as this is where the impact seems greatest, but there is not enough space/ provision for many to be helped at the moment.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Again I just feel costs to services should be considered

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

I don't know if this would count as a group, but very large families can be difficult to accommodate and to keep in private rented properties, as quite often the reasons for eviction can be things like ben caps - rent arrears, and overcrowding regs for landlords as houses do not tend to have enough rooms.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

I do wonder whether social housing could build more very large houses but I'm unsure what else could be specifically done as earlier intervention is already covered in general.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

I feel this will be beneficial as long as it is made absolutely clear what the role of LA and social services is to reduce the debate between them. As a theme, the main challenges are likely to be educating both sides, staff and resources, especially housing resources if essentially ruling out forms of accommodation that are currently more available.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

I feel that as social services are part of the LA there could definitely be specific teams made up of staff from both sides who deal with the young people to ensure consistency, we have previously had specific teams for refugee schemes.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

I do agree but I feel like it would need to be highly supported and in exceptional circs as I feel it's a big task for a young person to manage an occupation contract.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

I do feel one cost to removing priority need is that if everyone is priority need then no-one is, although I understand the idea of taking individual approaches I just feel with current resources it's sometimes been a case of who gets placed in accommodation full stop

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

I do agree with most of them but I think some are short sighted about the extent of the current crisis. There is never an aim to place anyone in an unsuitable placement but sometimes the only options are to do so or to leave them street homeless, especially if shared sleeping space is not allowed as this will mean that there is less utilisation of sleeping space in emergency provisions and will also stop things such as the use of churches as additional cold weather provision. I also feel for location it would need to be defined carefully what 'reasonable travelling distance' is as this is already a great point of contention. I do agree with 'homeless from home' as an option.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

Generally at this time our homeless service does not involve social housing unless there are exceptional circs of a person e.g. unable to mobilise around an unadaptd home as the waiting lists are not quick or set up in a way to manage homelessness. I do feel this could improve but I feel like this

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

I agree that this is best to help people move through the system faster. I do feel some people will refuse private rentals as they ultimately want social housing for security however they would have the choice and it would just have to be made sure that they had the right info to make a decision.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

Cannot think of anything

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

I'm not sure if it goes far enough in terms of outlining how to make the resources available for the proposals to be possible, e.g. limited discussion of how funding would be impacted.

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

I think this is missing the point and the focus should be on making resources available for housing authorities to be able to assist more effectively as all that can be offered by us is what is available and within our scope of control

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

I couldn't find a section lining up with the implementation section?

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

I do think it's important to make sure Welsh provisions are there although I do think this is generally already prioritised and to be honest there is much less demand for Welsh language service than minority ethnic languages. I do think that in some ways focusing even more on recruiting Welsh language speakers specifically unless essential for the role can limit selection based on merit and experience so I think interpreters and translation services should be an equal option, as this is what is considered acceptable for minority ethnic languages.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Cannot think of anything not addressed

Response 27

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

The proposals should create increased awareness across public services with partners actively engaged with the homelessness agenda. A greater system wide understanding of the drivers and impacts of homelessness across sectors, should, over time, improve communication, collaboration and ensure a joined up approach for those at risk of and experiencing homelessness.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Agree with inclusive nature of the proposal and recognition of needs of health inclusion populations and those protected under equalities legislation.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

Current Legislation – ‘Homelessness is not just a housing issue’

CTMUHB strongly agree with this statement and believe in a robust cross-sector, multi-disciplinary approach to tackling homelessness and its corrosive effects. CTMUHB’s Specialist Mental Health and Substance Misuse Housing Outreach Service already provide health services at place (temporary accommodation settings, hostels and street) using an MDT approach including specialist nurses, psychologists, therapists and support workers. The Team are co-located with RCT Council and the programme has generated value from Housing Support Grant and Area Planning Board funding. CTM would recommend this model as one which aims to prevent the circular nature of homelessness for those within the health inclusion population, having successfully supported individuals into secure housing with and without support and even onto settled employment.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Agree with those bodies listed.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

CTMUHB are encouraged by the duty to refer and duty to Co-operate, however, the means and methods by which this is done need to be agreed. There should be consideration around which specific areas of healthcare provision the duty could or should practically apply to. The White Paper makes continued reference to mental health service provision as a key intersection with homelessness services for example. It would be sensible to begin at this intersection before broadening the duties to wider areas of the health service.

CTMUHB require further clarity around the use of language which pertains to those with ‘mental illness’. This remains a broad, and to an extent catch all term, and due regard must be given by way of explanation to the spectrum of acuity of mental ill health. Clarity must be provided around the duties to refer and co-operate in particular, as to when such an intervention is expected from healthcare professionals, dependent on the complexity or co-occurrence of conditions present.

Improvements to hospital discharge from both acute and community hospital settings form part of the national Six Goals for Urgent and Emergency Care Programme. CTMUHB have taken an integrated

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

approach, utilising D2RA pathways and the evidenced frameworks of SAFER and Red2Green to transform its approach to safe and effective patient discharge. It is a goal of this work that no patient is either discharged into homelessness or is stranded in hospital due to their housing situation.

However, attention must now be given to D2RA pathway development across mental health in-patient services with due consideration given to housing and homelessness factors from point of admission. Now is an excellent opportunity to build this work, informed by the White Paper consultation, as such settings appear to be the most critical intersection between those with complex needs and risk of homelessness.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

With respect to health practitioners, it will be necessary to build awareness and capability around the recognition of homelessness and homelessness triggers. These are not clinically present and therefore a considerable effort is required to ensure health practitioners are supported to understand the social and emotional drivers of homelessness to prevent its occurrence and to know when the time is right to make a referral into homeless services. This must include a clear understanding of the concept of homelessness and the risk of becoming homeless in all its guises.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

It was the under-pinning aim in developing the Specialist Mental Health and Substance Misuse Housing Outreach Service that we were able to reach and engage with a health inclusion population and prevent the deterioration in both mental and physical health amongst a vulnerable population traditionally considered 'hard to reach'. The strategy has been to both go to place and also to co-locate health, housing and support teams.

CTMUHB would welcome further exploration into opportunities for multi-disciplinary team working, whether this be within primary care pan cluster development, integrated community and social work teams or the emergence of in-reach models where a homelessness or health inclusion service may have co-located provision within appropriate healthcare settings.

Professional collaboration should be done in proximity rather than by referral form or generic inbox.

Trauma informed services must be developed around the person and designed around a relationship with them rather than a network of referrals and touchpoints with multiple services which too often attain no value for either the service or the person.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

The lack of available data to make a considered calculation is of concern. Resource costs (administration) has the potential to become a burden to healthcare services, even if there is an expectation that the referral process will be brief (20 minutes). There is potential under-estimation of required resource as a broader investigation may be required into a patients' social circumstances in

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

order to gain enough understanding to proceed with a referral.

As patient numbers of those potentially at risk of homelessness cannot be well estimated, there is a need to pilot the identify and refer process (potentially in mental health in-patient settings) to help limit and test numbers of referrals. This may also help expose the level of complexity within the process for health professionals.

Broadening the scope to primary and secondary care could vastly increase the number of referrals which may become unmanageable for both health professionals and housing authority staff. Again, implementation should be iterative and tests conducted via small scale pilots to assess the capacity and capability across health professionals to effectively identify and refer patients at risk of homelessness and the right time.

There is also a need to understand the health inclusion/complex homelessness population. Services cannot be re-designed without this data. Obtaining this data should be set as a priority to understand how legislative changes are creating value.

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Significant numbers of people currently accommodated in temporary accommodation across Wales including 3346 dependent children under 16.

The longer term impact of homelessness upon children in Wales is a considerable concern for health services in terms of both current and future planning of services. The nature of trauma as a result of homelessness on children is not yet understood and CTMUHB would strongly support the case for immediate research into this area. We would recommend Welsh Government look to the Centre of Excellence for Health and Housing Research based at the University of South Wales to support in this area.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

CTMUHB wholly agree with the proposals to ensure ALL local authorities in Wales hold an accessible register. At present, there is inconsistency across the health board footprint local authority partners with regards to accessible registers.

CTMUHB would go further in requesting an immediate and systematic review of accessible accommodation across Wales. This should include the physical make-up of temporary accommodation utilised by local authorities as well as the range of RSL accommodation models, with the aim of reducing the number of disabled people disproportionately affected by the lack of appropriate homes.

Due consideration should also be given to age restrictions placed upon the provision of accessible accommodation by RSL's, often reserved for those aged 55+. Such allocation thresholds may be considered arbitrary as it is common for such homes to be offered to those who do not require accessible

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

accommodation at point of letting. This situation discriminates against younger people in need of adapted/accessible accommodation and currently does not make best use of supply of a limited and valuable resource.

<https://www.bbc.co.uk/news/uk-wales-67169806>

CTMUHB case studies point to a number of male patients who have entered healthcare services for planned amputations and who, as a consequence, are unable to enter either temporary or permanent housing due to their disability and lack of appropriate housing solutions. The case studies point to the need for advanced and multi-disciplinary planning for homelessness in these situations, which are becoming more common.

Feedback from CTMUHB discharge liaison teams also refer to a growing number of bariatric patients who have specific, accessible accommodation needs, including the structural re-enforcement of a property. These patients, again, are unable to return home without significant physical adaption to their homes or a new home being developed.

In cases where suitable accessible accommodation is not available, patients remain in hospital for several months, and in exceptional cases spend years as an in-patient despite being clinical optimised and not requiring on-going hospital care. The cost associated with this is born by healthcare services and vital hospital beds are occupied for significant periods by patients who are better served at home. Hospital beds which cannot then be utilised by acutely unwell patients or those in need of rehabilitation.

At a recent health and housing consensus event hosted by the University of South Wales which aimed to define 5 key research priorities across the sectors, it is interesting to note that priority 5 was defined around physical health needs now and in the future and the ability to match this to appropriate housing stock.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Amendment should provide clarity for 16/17 years olds. Traditionally, those within this age bracket have been able to access housing registers, with RSL's having to create discretionary provision such as licenses with guarantors in order to create a 'tenancy' for a young person. This creates a weak legal basis

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

for occupation, leaves the young person vulnerable and adds complexity to the management and support of the 'tenancy' for the RSL.

Should legislation be amended to allow 16/17 year olds to hold occupation contracts there will need to be attached provision of wrap around support, based on the assessed vulnerability/maturity of the young adult to successfully maintain their home. Programmes such as GRAMO (RCT Borough) could become an obligatory part of a support package with RSL's encouraged to develop 'coaching' models for young tenants around financial and tenancy management, alongside support with education, training and work opportunities for example. As an independent model of tenancy management for this age group is largely untested, it may be good practice to obtain case studies from RSL's with experiences of housing 16/17 year olds to date, to understand what may have worked well and how it may impact RSL's should it be legislated for.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

At present levels of spend on temporary and or supported accommodation for this age group are high and will increase should the provisions come into practice. Providing stable, permanent accommodation should reduce costs associated with temp accommodation but provision should be off set by resourcing on-going tenancy support.

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Whilst Rapid Re-housing was espoused at the introduction of each consultation session, it remained the elephant in the room. Rapid Re-housing is dependent on the supply of appropriate accommodation, including models such as Housing First. However, appropriate housing supply that meets the needs of a diverse homeless population remains a panacea and therefore this ambition is not currently grounded in reality.

In recent interviews with the CTMUHB Specialist Mental Health and Substance Misuse Housing Outreach Team, we obtained the following commentary in response to the request to 'share with us any stories or experiences you feel would be relevant to our understanding of housing related issues that impact your role in providing care to patients and service users'?

"lack of housing - people having to reside in temp accommodation as limited options available - being moved around to accommodate others in temp accommodation is unsettling and also impacts on other services such as re arranging a prescription they collect daily from a local pharmacy"

"There are a number of residents with drug and alcohol issues who are made homeless and placed in inappropriate TA. Although there is a lack of TA and due to previous offending risk there is reduced options, however when placed in these TA, the individual often relapses. This not only declines their mental and physical health, but for lack of a better term, appears they are "set up to fail" and not given a chance that they could benefit from."

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

The key theme through conversations with health practitioners and managers has been the ability to safely share information and records across organisational boundaries. There remains a significant burden upon health staff where homelessness issues arise for patients, most often in acute and community hospital settings. The ability to connect with the right people within housing departments and to obtain appropriate and meaningful information and housing advice is often time-consuming and can result in a drawn out process for the patient. Shared information and/or platforms are considered an ideal future solution.

Response 28

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No Response

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

No Response

Q5. Do you agree with our proposal to abolish the Intentionality test?

No Response

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No Response

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

This submission outlines the strengths of adopting a human rights-based approach to policymaking and advocates that this approach be more explicitly integrated into the White Paper. The submission then sets out the requirements for participation in housing decisions and recommends that consultation documents be user-friendly (particularly with respect to length). To ensure meaningful participation that strengthens relationships between the community and the state, the submission advocates that participants' views should be incorporated into the suitability of accommodation and the Welsh Government should keep an evidentiary record of how participants' views influenced decision making on offers of accommodation.

Human Rights in a Policy Context

The Welsh Government's approach to human rights, and international human rights in particular, has been engaged and positive (see, for example, "Action to strengthen human rights in Wales: 2018 to 2022"). It has recognised the importance of engaging with accepted these international standards of best practice, both as a set of legal commitments and as a guide to best practice. That recognition has included, but not been limited to, adoption of legislation that requires due regard to UN instruments such as the Convention on the Rights of the Child and the United Nations Principles for Older Persons.

The value of a policy approach that engages fully with international human rights is four-fold. First, it provides a common set of principles and values for those implementing policy. The policy generation process cannot cover all eventualities, and even excellent policy requires a wide range of public bodies to make implementation judgements. The support of the human rights framework can guide those public servants in making dignity and human rights informed decisions.

Second, a human rights-based approach mitigates against the divergence between Welsh approaches and broader legal obligations. The UK is party to a very wide range of human rights treaties and in many cases the legal obligations are equally applicable to devolved administrations. Aligning Welsh policy with those standards avoids bringing it into conflict with the UK or international minimum requirements.

Third, it allows Wales to more directly draw upon range of international expertise. Much discussion of housing and homelessness is framed in terms of international human rights standards. Matching these standards will make transposition of that expertise to the Welsh context more straightforward. This is an approach that many smaller jurisdictions take.

Fourth, it positions Wales as a national and international leader on living standards and human rights commitments. This can have significant reputational benefits and mitigate potential reputational harm that can come when Wales' record is examined in UN and other international bodies.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Human Rights in the White Paper

Despite the Government's commitment to human rights and the advantages to aligning human, there is a striking absence of rights in the White Paper.

Engagement with human rights is limited to minimal mentions of the Conventions on the Rights of Persons with Disabilities in the Paper. Even the impact assessment only engages in a surface manner with the requirements of various human rights treaties.

We recommend that there is a much deeper engagement with rights frameworks, such that they provide a 'spine' for the White Paper. A diversity of human rights principles – including on different groups and themes – are relevant and should be included. The Paper should address human rights instruments on children, persons with disabilities, women, racial and ethnic minorities migrant workers and older persons, and should cover the themes of access to justice, quality of rights enjoyment, housing, interdependence of rights, and dignity.

Doing so would add considerable richness to the proposed approach and would ensure that there are fewer 'unintended consequences' of the policies. As discussed above, such human rights principles would also allow Welsh public bodies to learn from the approaches of other nations and to understand the ways in which other governments have prioritised in resource-constrained environments.

International Human Rights Law: Participation and Housing

Participation and consultation are key principles underlying the International Covenant on Economic, Social and Cultural Rights (ICESCR), and this has been repeatedly emphasized by UN human rights bodies in the context of the right to adequate housing.

In General Comments 4 and 7 in relation to the right to adequate housing, as well as in General Comment 26 on land, the Committee on Economic, Social and Cultural Rights (CESCR) has highlighted that individuals and communities must be properly informed about and allowed to meaningfully participate in decision-making processes that may affect their enjoyment of the right to adequate housing.

The same principle has been repeated by the Special Rapporteur on adequate housing (see, Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, 2007, A/HRC/4/18, Annexure 1, paragraph 38; Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context, 2018, A/HRC/37/53, paragraph 62).

Overall, participation and consultation must be key principles underlying any strategy to end homelessness. This applies to the development of legislation and policies to end homelessness, as well as individual decisions made with regards to homeless persons (or those at risk of homelessness).

This requires: (1) provision of all relevant information; (2) soliciting inputs from all potentially affected groups and persons, including women, children, and persons with disabilities, as well as others working on behalf of the affected; (3) due consideration of those inputs, so that contributions are not disregarded, and consultation is not simply a tick box exercise, rather that it is genuine, meaningful and deliberative.

Applying Human-Rights Based Approach to Participation and Consultation in Ending Homelessness

A human-rights based approach supports the work being undertaken by the Welsh Government in developing the White Paper on ending homelessness in Wales, while also indicating potential areas for improvement.

It appears that the Welsh Government has developed the White Paper through extensive consultation with and participation of those with lived experience of homelessness, including through the Experts by Experience Project (see paragraphs 12-17 of the White Paper). The current consultation also provides an opportunity for all affected persons and groups to be heard and participate in the development of the white paper on ending homelessness. The Welsh Government ought to draw on a human-rights based

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

approach to buttress the process of consultation and participation being followed.

During this consultation exercise, the Welsh Government has made available a children and young people's version of the consultation document; an easy read version; as well as a British Sign Language video. This is likely to enable a wider group of persons to participate. At the same time, it must be acknowledged that the consultation documents are long, make a large number of proposals, and therefore require considerable time to properly participate. This is likely to hamper genuine participation of all impacted persons and groups.

The proposal to 'build choice into the system' in ensuring access to suitable accommodation (see paragraphs 505-508 of the White Paper) enables the participation of impacted persons in decision-making related to their housing. It proposes to make the completion of a Personal Housing Plan a requirement on local housing authorities. As part of this plan the local housing authority should ascertain the applicant's views on the suitability of accommodation in relation to their personal circumstances, and evidence how these views have influenced subsequent offers of accommodation. The plan should apply to emergency, interim and settled accommodation. This proposal is in line with a human-rights based approach that emphasises participation of impacted persons in all decisions about their housing. The proposed process appears to be more than simply a tick box endeavour, rather requires that local housing authorities indicate how the views of applicants have influenced offers of accommodation. The Welsh Government ought to draw on a human-rights based approach to buttress these proposals.

The Welsh government is to be commended for this initiative and by more explicitly incorporating human rights principles on housing, particularly with respect to participation, it can ensure the success of the initiative, as well as enhance the human rights and dignity of all.

Response 29

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

It is taking people much longer to find alternative accommodation in the current climate, whether that be in the private or social housing sector. Therefore prevention work is needed at an earlier stage to maximise the chance of finding accommodation. Since the Renting Homes Act gives private occupation contract holders 6 months notice, it makes sense to bring the homelessness prevention duty in line with this, otherwise they may feel unable to do anything until their notice period has almost expired.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Consideration of the LA's ability to relieve homelessness into the private sector - e.g. is a Bond scheme which many councils run fit for purpose? Clarification of the reasonable steps would be helpful.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes - I think it would be difficult to remove local connection at the same time as the other two tests as some authorities may find themselves overwhelmed. A clearer and longer list of exemptions is needed. I think this is particularly relevant to LGBTQ+ people who may wish to live in an area that is more accepting of their identity, or closer to friendship groups if family relationships have broken down. In my experience, greater clarity is needed around people who have left a particularly area due to abuse/violence or threats thereof. Many people are too scared to make a report to the Police and are

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

therefore unable to provide evidence of the need to leave the area. This doesn't make their fear any less real and keeping them in an area they don't feel safe is likely to cause further harm.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Significant increase to HSG so that prevention can be undertaken by a range of organisations and not just LAs

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Please give your reasons:

Broadly, yes. I think there is a significant need for training and understanding across various sectors that comes with this duty. There would need to be clear guidelines around which agency is responsible for what tasks or costs, to avoid people getting stuck between agencies who believe they are not responsible for a particular action. This has often happened with 16/17 years olds who get stuck between Childrens Services and Housing Options.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

I would like to see schools and colleges added.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Training for staff on identification
Potentially a lead for referral within teams
As above, clarity on who is responsible for what

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

I cannot find this information in the document

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

I have previously referred to people of the LGBTQ community and considerations around their need/want to be in a particular area. LGBTQ+ young people are disproportionately effected by homelessness.
See - <https://www.taipawb.org/blog-story/the-outside-project-providing-lgbtq-safe-spaces-and-support/>

I believe that more targeted support is needed for women involved in the criminal justice system.
Removal of priority need status may go some way to assist this group.
https://www.thegriffinsociety.org/system/files/papers/fullreport/griffins_research_paper_2017-01_.pdf

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

In my experience, departments often don't work well together and therefore very specific guidance around each department's responsibilities is required. I believe joint training would be beneficial and a lead person within each department.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Disagree. I think 16 and 17 year olds will always require a degree of support. There may be a very small proportion of individuals for whom this might be suitable.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

I agree that temporary accommodation with Category 1 hazards or deemed as not fit for human habitation should be prohibited

Shared sleeping space - I agree this is a poor model that should not be used. I would question whether there is a need for exceptions due to SWEP. I think very clear guidance is required around SWEP accommodation, particularly in light of Cardiff LA using a former shop as SWEP accommodation with 60 beds in shared space. If shared accommodation is to be prohibited, a suitable alternative for SWEP needs to be acquired and equipped, particularly in high demand areas such as Cardiff.

In terms of culturally adverse accommodation, I think this needs to be widened to consider whether it is appropriate for women to be accessing shared accommodation with men, particularly where the woman's religion may have strict rules about the interaction of men and women.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

I agree with the power to remove people not in housing need.
I am unsure about the additional priority for homeless applicants, particularly if they are to be placed above those with urgent medical needs.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

I welcome the consideration to supported lodgings, however my concern is that applicants may not wish to accept this if they lose their homelessness duty. Also, providers of supported lodgings may find that their guests are unable to leave their homes if move-on options are limited. Supported lodgings is unlikely to be a permanent arrangement as hosts lives may change without significant notice. I believe supported lodgings would be better suited as an alternative to temporary accommodation whilst support is provided towards a permanent solution in PRS, supported or social housing.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

I welcome the additional duty to help to sustain accommodation provided to discharge a homelessness duty. This is likely to be provided by HSG funded services, therefore the implementation of this will need to be accompanied by a significant uplift in the grant, which many providers are already saying is underfunded.

Response 30

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

In isolation the proposals will have limited impact without additional investment in partner services. The proposals are welcomed and needed, but the bigger picture involves very many more services which are already at breaking point.

We welcome the additional time period for people to receive assistance to prevent homelessness.

However, does there need to be a time period on this? If evidence is available that someone is threatened with homelessness, surely, the earlier the better?

We are in favour of the 12 months' support once accommodation is attained. However, the consultation document is vague in relation to the service user views on whether this support is required. The assessment of whether a person is settled and living stably in their home omits any reference to the service user views/consent. In addition, there is little information about how the duty to cooperate will work with internal public services.

PHP – does this new duty confirm the need to issue the PHP within the guideline for the assessment decision of 10 working days, and will this be legislated? We welcome the proposal to develop templates and guidance for best practice in this area. Clarification around 'reasonable steps' – this is dependent upon the ability of the applicant. Clarification on the rights of the applicant should the LA fail to meet their requirements within the PHP. Clarification on whether the PHP will be shared with support/housing providers.

The proposed additional support measures will have little impact without dedicated HSG funded services being in place. The current proposed freeze to HSG is requiring support providers to reduce services available and this completely contradicts with the proposals within this paper.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Regulatory requirements relating specifically to homelessness ensuring consistency across Local Authority boundaries.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes – however the paper does not clarify whether the same test will be applied at homelessness duty and allocation of social housing. Further clarification is required.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Please note additional commentary for the questions asked above as well as a response to Q7:-

4. Do you agree with our proposal to abolish the priority need test?

Yes

However, we need to be funding appropriate prevention services in order to ensure that people are receiving the levels of support required.

5. Do you agree with our proposal to abolish the Intentionality test?

Yes

However, the deliberate manipulation test needs further clarification. Where people are identified that could receive removal of reasonable preference, further details are required regarding the decision levels at this stage. The paper provides limited information on this and appears to be moving the intentionality test over to housing providers to apply the deliberate manipulation test.

This is where regulation would provide consistency across local authority areas.

6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes – however the paper does not clarify whether the same test will be applied at homelessness duty and allocation of social housing. Further clarification is required.

7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

The Impact Assessment focuses on the additional impact on local housing authorities in relation to the proposed new duties. However, it doesn't necessarily take into account the wider cost and impact on landlords and other public services.

The freeze of HSG will have an impact on the amount and level of support available to support applicants throughout all stages of prevention and relief.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

The proposals are person centred and support a trauma informed approach to working with people who are homeless or faced with homelessness. However, the additional pressures that this will place on other agencies needs to be adequately resourced to assure that it is meaningful and not tokenistic.

Developing partnerships across services should be promoted and prioritised as too often the success of arrangements is centred around particular working relationships rather than formal arrangements.

However, we would be concerned to see any formal requirement that would jeopardise current practices already in place.

Secure funding must be available for all partners to pre-plan support delivery and ensure that there are adequate services available for those in need.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Yes we agree. We would also include the private landlords within this duty as the predominant referrals to Local Authorities for homelessness support are made from the private sector.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Yes we do need a Housing rep on the RPB. We have that in North Wales, but it doesn't help with practice on the ground. As each LA has a duty on homelessness the joint work needs to be at LA level or at least PSB..(which means two councils together in N wales). What we need are multi-disciplinary groups who meet regularly to discuss ongoing case work/cases of concern so we can address recurring issues about not being able to access mental health services/safeguarding issues etc etc and issues about people accessing services early enough to prevent homelessness; so early intervention teams which include primary care, mental health, criminal justice (probation probably) and LA, including social services, education and housing should be a requirement in each LA area.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Regarding the proposal that cooperation would end through a process of mutual agreement between the LA and the relevant bodies, we would welcome more guidance on this proposal and what would happen if parties were unable to agree. In addition, further guidance is required around definitions of 'a good reason' and what account is made for lack of resources/ capacity etc.

Further guidance is required on the duty to support to retain. How often this is reviewed, when it can be closed/ended. How this fits in with the discharge into supported accommodation?

In addition the duty to support to retain makes no reference to the voice of the applicant and their views on support required.

The ability to close this duty needs to be further defined and whether this is a partner decision, with the involvement of the landlord.

We will require a mechanism for data sharing to ensure that all partners have access to up to date and

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

relevant information in order to prevent the need for an applicant to constantly repeat information already provided. However, data sharing is extremely difficult with statutory agencies and see little benefit of setting measures in place if this cannot be resolved.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

We would welcome enhanced case coordination to ensure a trauma informed approach to support. We would be happy for further work to explore the remit of current partnerships and the potential development of a joint homelessness board. However, we would like further clarification on the involvement of 3 or more services and how this will be identified – based on referrals or whether the case has actually been opened. Currently there is a lack of services available and this could limit the escalation to this stage.

In addition, we would welcome a wider remit here to include people who are struggling to maintain their tenancies within social housing, but have not been issued with a notice. Often Housing Associations do not serve notices and undertake a large amount of 'prevention' work without having additional services available to them. We do not want to have to start directing people through homeless services in order to attain the service they need.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

We would support the feedback provided by CHC in response to this question.

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Through work with people with lived experience we can see that there are further groups of individuals that are disproportionately affected by homelessness – eg, males under 35. However, this is part of wider reform required in relation to the welfare benefit system.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Regulator role – requirement to have a consistent process across all Local Authority areas. At the moment there is a disparity depending on which LA you are working with.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

There has been little progress between Social Services and Homelessness since the Southwark judgement. Specific supported accommodation for 16-25 year olds is at risk due to a lack of HSG funding available. In order to be able to meet this proposal, the appropriate level of investment into support needs to be made.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No - 16/17 year olds should never be transferred into Homelessness.
The lead public service for these young people should always be Social Services with cooperation from the Local Housing Authority.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

This would need to be a person centred decision, and based upon a detailed needs assessment undertaken in partnerships with Social Services.
What are the wider legal requirements in relation to legal responsibility of a 16/17 year old?

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

This is contradictory to benefit legislation. When talking about unsuitable temporary accommodation for people aged under 25, you then can discharge into shared to end the duty? Further clarification is required as to whether the same suitability standards will be applied to the end of duty. Given that 18-25 year olds can only access shared room rate on benefits, how will this work?

Supported accommodation for under 25s – we agree with this proposal, but a major input of funding is required to develop the services that will be needed to support this.

We note the proposal about the unsuitable accommodation at the prevention stage if this is the applicants choice. However, further clarification is required regarding the applicant's choice for the further duties owed.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

We support the feedback provided by CHC in response to this question.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

We are unclear as to how this sits alongside the duty to sustain a tenancy? Will the homeless duty close and the duty to sustain open? If so, is the proposal stating that the reviews required will be different based on whether or not someone is in supported accommodation?

This then also raises additional pressures on support providers in terms of move on accommodation. If the homeless duty has ended what reasonable preference is provided on the housing register/application? Are the applicants deemed as suitably housed?

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

Strengthening the regulatory requirements of RSLs – no problem with this, but should be noted that we work in partnership with Local Authorities already and could create a power imbalance within the relationship. There is a danger that we are putting something in place to enforce for the minority rather

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

than promote the way the majority already work.
Any regulatory requirements for rehousing need to be applied equally to RSL and stock retaining councils

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

Specific Regulator for Homelessness
Duties on all landlords in Wales and not just RSLs.

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

We support the feedback provided by CHC in response to this question

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 31

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

The Network welcomes the proposals in the white paper and the Welsh Government's ambition to end homelessness. The focus on a more collective public service approach with core teams across public services working together is supported as is the focus on greater partnership working with better access to referral mechanisms and the proposals to include additional groups to the list of exemptions in terms of connections to communities, particularly the inclusion of veterans.

However, there are concerns amongst Network members with the ability to deliver these proposals, particularly in terms of the availability of housing stock both private rental and social housing and the additional pressures on existing services, as well as the need to ensure that there is a comprehensive programme of training and support for practitioners.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

None identified.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

The Network welcomes the aim to move towards a person centred approach. We agree with the proposals and the suggested additions to the list of exemptions, particularly the inclusion of veterans and co-habitees and those at risk of or subject to domestic abuse. The Network also notes the considerations

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

around “special circumstances” criteria for exemptions and would support the list of proposed groups, as well as the strengthening of the end-to-end reconnection service where applicable. One area of concern for the Network is the additional demands and costs these proposals would place on existing services and the need to understand the impact of these changes prior to implementation.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

None identified.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

The Network agrees to these proposals in principle as they identify that the causes and consequences of homelessness are wide-ranging and require a collective response from a variety of partners. The Network would emphasise the need to develop a comprehensive and coherent training programme to support colleagues in implementing this approach as well as establishing a clear understanding of the additional demand it would create.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

We agree with the list of proposed relevant bodies and the consideration to include schools. We also agree with the suggested aim to include non-devolved bodies – as listed – in order to promote a collective partnership approach to reducing levels of homelessness.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Yes

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

The move to a wider public service approach will require additional training and guidance to ensure there is a consistent approach from all stakeholders and to ensure that there is clear understanding of roles and responsibilities.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

The Network welcomes this proposal as individuals with complex needs require access to services to regulate their lives to maintain their accommodation. The aim to expand this to a wider public service responsibility is fully supported by the Network as there is currently real concern across Councils in Wales with regard to maintaining current levels of service provision by themselves.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

None identified

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

None identified

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Nothing additional identified

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

Whilst the aim of the proposals is welcomed, the main challenges relating to available housing stock and the imposition of additional legislation will add to already stretched service provision which may impact on current service levels and on those that require support.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

We agree with the proposals to strengthen existing corporate parenting responsibilities in order to provide effective support but in doing so there needs to be an acknowledgment of the current pressures and challenges on service provision, and the wider aim of the legislation to ensure that a more collective approach is required so that the focus to support individuals is not just the remit of the local authority.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

We agree that 16 and 17 year old should be allowed to hold occupation contracts and would reflect the rights and responsibilities that already exist for individuals within this age bracket.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

None identified.

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

We agree in principle with the proposals to increase the suitability and standards of accommodation. However, as the success of this approach is dependant on the capacity of current housing stock levels to meet these new levels of suitability, there is uncertainty whether ability to meet the demand created by these new suitability standards will be achievable in the short term.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

We agree in principle with the proposal of ensuring people experiencing homelessness are allocated long-term suitable accommodation as quickly as possible. However, as the consultation points out, there is not enough social housing to meet the needs of those on waiting lists so whilst the ambition is welcomed, the reality may mean that these requirements may create additional pressure and tension between local authorities and RSLs, when the aim is to improve that relationship.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

Whilst the proposals around short-term availability and the associated safeguards are welcome as they provide flexibility and additional options to support those in need, there needs to be a clear understanding of the additional demand this would create as well as the availability of these additional housing options.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

None identified

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

The ambition set out in the White Paper is welcomed and the general aims of the proposals set out in the White paper are supported. However, as the consultation highlights, they are being proposed in an environment which is exceptionally challenging for public services in Wales and there needs to be careful consideration of how these changes will be implemented on already stretched services. The White Paper sets out a clear ambition for a more a more collective approach to reducing homelessness in Wales and the Network would suggest that this collective approach is also considered in terms of the implementation of these proposals to ensure that there is no negative impact on current service provision in this area.

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

None identified.

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

None identified

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

The ability to have access to information in Welsh will help reduce stress and anxiety of those who need support to navigate the processes involved.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

The Network supports the ambition and principles proposed within this consultation, both in the aim to develop a collective approach to reducing homelessness and the measures to widen the criteria for inclusion. The main concern from Network members is the ability to deliver these proposals considering the pressures and challenges on existing services and the current level of housing stock which will be a defining element in delivering these proposals. With this in mind, Network members have identified that to maximise success, there could be a phased approach to implementing these proposals to reduce impact on existing services, provide effective support to those who need it and create a long-term sustainable approach to reducing homelessness.

Q33. If you want to receive a receipt of your response, please provide an email address. Email address

safercommunities@wlga.gov.uk

Q34. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 32

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No Response

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

No Response

Q5. Do you agree with our proposal to abolish the Intentionality test?

No Response

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No Response

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Vulnerable adult groups – individuals who do not meet the existing service eligibility criteria for secondary mental health or learning disability services, but present with significant behavioral issues, due to historical trauma and the development of unhelpful coping skills. The vulnerable adult group traditionally would have been supported in learning disability services, due to changes in assessment and the decrease in IQ range, they are frequently left without support, are a high risk of grooming, becoming involved in criminal activity, risk of homelessness and exploitation.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

- providing a focus on supporting young people who require short, medium or long term supported accommodation
- emergency bed resources available when required to prevent delays in ensuring accommodation can be made available, rather than having to seek alternative options e.g. hostels, privately ran accommodations
- consideration of the use of a bond system for care leavers in the private system to relieve local housing
- the building and development of general and specialist housing, to redefine what suitable accommodation means, as opposed to minimal standards in place for temporary accommodation and general housing
- accessing general housing for people with a mental health condition, who's support needs can be met safely in the community, due to lack of housing stock, the impact of new regulations for private landlords, the cost of living crisis and the short fall between housing benefit payments and what the tenant is expected to pay
- provide clarity on the section.117 aftercare entitlement 'for accommodation'. There is no automatic entitlement to accommodation for people in receipt of s.117 aftercare. The persons need for accommodation would need to be over and above a human beings common need for shelter and housing. The accommodation would need to have additional features to it to meet the needs arising from the person mental disorder and be documented in the care and treatment plan or social care assessment
- misunderstandings around the aftercare and accommodation criteria and prejudice pf people with mental health challenges, is likely to reduce the likelihood of accessing general housing with support in the community and created dependency of residential units
- In regards to 'People with complex health needs, including mental ill health, substance misuse and those leaving hospital'
 - o Health Services need to be consulted as they need to meet the needs of those in their care/to be discharged
 - o Health have no duty to report to housing (care treatment plans) this needs to be reviewed and strengthened (Information Sharing)
 - o it should be made clear that under the SSWBA where there is no identified Social Care need then Social Care should not have the responsibility to meet housing needs
 - o Clarity needed on responsibility to pay for placements Health/Housing when not a Social Care need
- Legislation could be made stronger to around deprivation and the Human Rights Act
- In regards to 'Survivors of violence against women, domestic abuse and sexual
- Violence' - Multi-Agency Risk Assessment Conferences (MARAC) to be linked into decision making. Additionally no reference to Free from Fear - would suggest including.
- Page 113 in regards to 'People in prison are not homeless during the period of their custodial sentences' needs to made clearer around ordinary residence status and what is then do with this and whose responsibility is it?
- Unable to comment on point 440 – responsibility where local connection - unable to comment as not clear where duty would lie

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

- lack of appropriate housing available within the Authority, this is a resource issue and there are current lengthy waiting lists already for citizens requiring general needs housing
- to improve opportunities / prevent homelessness government would need to enhance funding in all areas.
- consideration that often young people can't choose full time work because they will be charged high rental costs
- young people would benefit by spending time within a 24 hour supported accommodation whilst being assessed before being considered for a move to independent living

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

- generally covered well to ensure young people are safeguarded whilst multi agency processes take place
- the document appears to have more of an emphasis on Social Care and not Housing in regards to assessments by Social Care and not a joint assessment this appears to be contradictory to Welsh Government Legislation
- the documents appears to be missing a reference to Children's Rights and ascertaining the wishes and feelings of the child – these would need to be taken into account – young people do not always want to have support from Children's Services
- further clarity on "For young people leaving the secure estate, we propose legislation and guidance should be clear 16 and 17 year olds, who are expected to be released from the youth justice system within six months, are the responsibility of the local authority as part of their corporate parenting responsibility. Similarly, for young people in youth detention, who are or were care leavers aged 18 to 21 (or 18 to 24 if in education or training) should also benefit from joint work between social services and the local housing authority to support and accommodate" Youth Justice and probation responsibility needs to be added into this not just Social Care and Housing responsibility would need a multi-agency approach

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

- Agree:
 - o This would open up opportunities for young people who are tenancy ready prior to turning 18
- Disagree
 - o Challenges around this age group has to care for and protect themselves fully whilst living away from parental/caring figures in their daily lives

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Not aware of any from reading the document.

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 33

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

Founded in 1975, Taff Housing Association has almost 50 years of experience supporting communities and providing support across South Wales.

Owning and managing over 1,500 homes across Cardiff, we give more than 4,000 people a place to call home. Additionally, we provide support services for over 1,000 people in South Wales.

Taff Housing are therefore at the forefront of the housing and homeless crisis and the prevention agenda in Wales. This experience ensures that we are well placed to advise that Welsh Government's proposals will have significant impact on preventing and relieving homelessness.

Our experience has shown us that connected, person centred support is a crucial element in stopping people from being homeless and, importantly, to stop them becoming homeless again in the future.

However, despite Taff Housing continuing to develop further housing support options in South Wales, we know that the issue of homelessness has not gone away. Therefore we welcome Welsh Government's further focus on prevention.

Providing support for people to ensure they do not become homeless in the first place is Taff Housing's ultimate goal, and we welcome Welsh Government's commitment to this as well.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

No Response

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Taff Housing believes that homelessness should always be considered a priority; intentionality should also be abolished as our experience has shown us that there are often significant and complicated reasons for someone being made homeless; and that while a person's local connections to an area are often important to their long-term wellbeing, action to support individuals and stop them being homeless should be the first consideration.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Our experience has shown us that there are very few occasions where Local Authorities directly provide homelessness services, instead they often commission support providers.

Our aims and outcomes are largely determined by grant funding – for example the HSG provides a comprehensive set of outcomes and expectations that services commissioned in this way will deliver.

Taff Housing have a team of support workers who are trained to deliver numerous interventions to support individuals.

Over the course of an average year Taff Housing support services deliver support to over 1,000 individuals which in turn has a positive impact on future generations of those individuals and families and reduces the need for further intervention from future services from either housing associations or local authorities.

As part of our work, Taff Housing provides bespoke in-house training packages to staff.

The initial investment in these services, training programmes, and ultimately in staffing must be taken in to consideration when planning homelessness interventions and homelessness intervention services.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

Taff Housing's experience has shown us that the more organisations and bodies available to provide support for families and individuals, the better.

This should therefore extend to preventing homelessness as well.

This is something that Taff Housing already works to do via our hostel services as we bring together children's services, GPs, and mental health services- amongst others- to ensure a rounded and appropriate set of support mechanisms are available.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Good working relationships are essential for the promotion of effective change for service users. Taff Housing's experience in providing support to people through advice and assistance has shown that services which collaborate encourage engagement. In turn, this reduces stress and delay for our service users.

Our experience has shown us that mental health and wellbeing services are already stretched beyond capacity and that there is a lack of crisis care which often results in support workers stepping in to provide support whilst people are waiting for their services via referral.

Better investment in support providers will enable Taff Housing and other organisations to invest in staff and training for the long term. At present our hostels see a high rate of turnover of staff due to the challenges that the role brings that is in addition to supporting residents. Many of these challenges are due to wider services not being appropriately joined up, leading to long waits.

While the referral processes are often not at fault, the time that individuals and their families then need to wait for services often results in their case and needs significantly escalating.

To ensure people get the appropriate and timely support they need, Taff Housing believes that a person experiencing a crisis with their mental health or facing homelessness significantly benefits from support being immediately available to them.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Action to strengthen the multi-disciplinary support provided and available to individuals with complex needs is welcomed. Taff Housing work to ensure that we provide a variety of support services and interventions to assist individuals with multiple and complex needs, and therefore we can confirm that a wider requirement to do so will significantly improve the wellbeing of individuals.

Importantly, action to ensure a joined up approach is crucial to both preventing people from becoming homeless and to stopping people from re-entering homelessness.

Taff Housing has a number of case studies which demonstrate this:

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Case Study – Mr A

Mr A is an elderly gentleman who speaks little to no English. He is waiting on a family reunion. Mr A came to Taff Housing as he was homeless and sleeping at a place of worship. He had been sofa surfing for a few years but was asked to leave. At this point had been homeless for approximately eight months and had no access to cooking, cleaning facilities etc which was having detrimental impact to his mental and physical health. He relied on the community members to feed him, access services, and to help with his housing and benefits due to the language barrier.

Taff Housing initially saw him at the GAP drop-in services and then he was added to the refugee services as he had significant support needs.

With staff that speak Bengali at Taff Housing, we were able to directly communicate with him and provide some reassurance. We were able to begin building a positive relationship with Mr A.

We thoroughly explained the homelessness process, what it would entail and ensured he was fully informed to manage his expectations. We initially arranged a homelessness assessment for the gentleman and set up his home options. We then liaised with the council to provide all medical evidence and any other evidence they requested.

Taff Housing experienced some barriers as the local authority initially deemed that he was not a priority need.

Taff Housing therefore appealed this based on his physical health issues and his frailty due to his age and the fact he was rough sleeping.

Based on our account of his need priority the local authority changed their decision and accepted that Mr A did have a need for support. He was therefore successfully placed in temporary accommodation.

In addition, through liaising with Mr A's housing officer, we were able to fast track his home options application.

During this time, we worked with the local authority, home options, housing solutions, and the benefit department to ensure he was receiving everything he was entitled to in terms of Support and Benefits. We also worked with the Welsh refugee council to assist Mr A with his pension credit claim.

Mr A was initially placed in two temporary accommodations, during which time we supported him to apply for housing benefit. When being offered permanent accommodation, Mr A was initially hesitant about the accommodation as it was on the outskirts of the city and away from the community support, he heavily relied on.

Taff Housing raised concerns about the suitability of the accommodation, the likelihood of social isolation, impact on mental health. After some discussion between housing solutions and the service user; we supported the service user to express his feelings around the accommodation and to understand what was required to make him feel more comfortable to move into the accommodation.

Having built a positive relationship and supporting Mr A to feel heard he accepted and moved into the offered accommodation.

Taff Housing supported him to view the property, and on the sign-up day support him to understand the tenancy contract. Liaised with a representative of the housing association during the sign up. Supported him to sign the contract and liaised between the housing association and the service user regarding any documents that needed to be completed/signed.

Upon securing the accommodation, we supported him further with setting up his utilities, housing benefits, council tax reduction, applying for a DAF grant for furniture and household items, setting up his electricity bills, water bills.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Taff Housing therefore feels strongly that having consistent support from a person he has built a positive relationship with allowed Mr A to settle into his accommodation.

Taff Housing is proud to report that MR A has now been sustaining his accommodation for the last three months, he has received all his DAF items, and he is managing his accommodation well and is settling into the new community.

While this is one example, it is clear that joined up and consistent delivery of support and services to individuals is crucial to ensuring that the long term benefits of the support and experienced.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Taff Housing are the support providers for a number of projects supporting asylum seekers and refugees. During the crisis in Afghanistan in 2021 hundreds of Afghanistan nationals fled their country in search of sanctuary in the UK.

In Cardiff specifically we have assisted the local authority in providing support for over 400 families during the time they spent in bridging accommodation. The work the team did on this project earned them two awards in recognition of the difference they were making to these families.

We continue our work with refugees through projects with the Vale of Glamorgan. Families are living in properties on loan to the local authority for a period of three years, we have a team of support workers that are enabling families to seek and maintain employment, become financially independent and move into settled accommodation of their choosing.

In addition, Taff Housing are the providers of support for the UKRS scheme in Cardiff and Vale and Bridgend, helping nationals from Syria and Afghanistan to re-settle in the UK and in Bridgend we are supporting families and individuals from Ukraine to live alongside host families or to live independently until they are able to safely return home.

Our experience in providing this support to date tells us that there is a clear need for the needs of these minority groups to be specifically considered by Welsh Government when drafting legislation.

Additionally, there is a significant need to support LGTBQ ethnic minority groups. These individuals are at risk of persecution and discrimination due to their sexual orientation and ethnic background.

Welsh Government should ensure that the specific needs of people that fall in to more than one minority group and therefore considered, as often the impact on these groups is even more significant

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

There is often a gap or lack of services for those young people who fall between children and adult services.

Taff Housing support a large number of 17 year olds that have 'outgrown' the system for children or do not meet their threshold yet as a young adult they are vulnerable but in a system that feels to them to be directed towards older adults.

Young people who have needed to leave home have likely experienced trauma and lead lives that could be chaotic, what they need at this time is consistency of support and not to have to retell their trauma to a number of people on a number of occasions.

Young people are often placed in accommodation where their vulnerabilities are not catered for and therefore their problems are further exacerbated.

Our experience has shown us that currently there is a lack of resource in the grants and funding that is given to support providers meaning that staff retention for these support services can be extremely challenging. Additional resource and priority accommodation should be given to prevent the same issues reoccurring in the future families of the young people we are supporting.

Services not only need to work together but they need to think together as well.

As detailed previously, a joined up approach to service delivery and support is required across multiple agencies to ensure young people get the support they need.

The current outcome is that there are organisations specialising in providing support for young people only after the point that local authorities have not been able to appropriately provide support. Legislation is needed to regulate this, with financial support for local authorities also being provided, to ensure that these organisations are not able to simply step in at a later stage and benefit financially from earlier system failures.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Taff Housing's experiences in this area are detailed in part in our answer to question 16.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

As 16 and 17-year-olds are deemed eligible to be moved on via the training tenancy programme, they should also therefore be eligible to hold occupation contracts in those homes.

However, Taff Housing's concern is when 16 and 17 year olds are allocated accommodation which has been designed to be temporary or short term (Supported Housing), as this is not appropriately for their needs.

Our concerns in this area reach wider than 16 and 17 year olds however, as they extend to anyone of any age holding more secure occupancy contracts in accommodation designed and intended to be temporary.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Taff Housing works to ensure that our accommodation is appropriate, and is accompanied by the right services, to support individuals and their families. Providing appropriate accommodation is crucial to the physical and mental wellbeing of individuals and families.

Taff Housing therefore agrees with the proposal to increase the suitability of accommodation.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 34

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

The proposals amending the prevention and relief duties upon local housing authorities are largely realistic and proportionate, and based upon the evidence as set out in the Expert Review Panel's investigation into homelessness legislation.

The extension of the period within which an individual can be deemed as at risk of homelessness to six months (in line with notice periods afforded by the Renting Homes Act) is sensible, and ought to provide greater opportunities for preventative work to be carried out by local authorities and third sector services. It is likely that caseloads will grow as a result of this longer window, but we would hope to see more proactive work and longer-term thinking, rather than cases being left until the last minute.

The proposal creating a duty for Local Housing Authorities to draw up a personal housing plans (PHPs) for all applicants is welcome and should provide a greater consistency of approach between different authorities. PHPs are a valuable tool for promoting person-centred support and should be a holistic assessment of all the needs of the individual seeking assistance, including mental and physical health, substance use, and criminal justice needs in particular.

The PHP approach is a recognition that there are multiple complex and overlapping factors that must be addressed in order for an individual to successfully maintain a tenancy. We also welcome the proposal that these plans should be co-produced with the applicant (rather than drawn-up and enforced on them), and that they should be subject to regular reviews.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No. We agree that with the removal of the priority need and intentionality tests, the relief duty is also no longer needed. The main legislative intervention needed to strengthen prevention working is the extension of the period of time in which an individual can be assessed as at risk of homelessness, from 56 days to six months. This will allow local services to better manage caseloads proactively, however this will not be achieved through a change in legislation alone. It will also require robust statutory guidance to ensure that the full six-month period is used effectively, as well as adequate financial resources to ensure staff are able to focus on prevention work rather than needing to prioritise emergency placements.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No, we believe that the local connection test should be scrapped altogether. However, we recognise that this is a step in the right direction, adding extra exemptions where the test will not be applied will provide some reassurance for specific groups of people, including those fleeing domestic violence and LGBT+ people.

We are also open-minded about trialling new reciprocal arrangements between local authorities; for example, one local authority may be prepared to accept a duty to assist an individual from outside their area if there would be a guarantee that the originating authority would assist an individual moving in the opposite direction. Alternatively, Welsh Government could trial a national funding model with flexible budgets ringfenced for individual clients wherever they present to services.

If the final decision is taken to retain the local connection test, then there needs to be a renewed focus on reconnection, and a genuine offer of support to help people engage with support in their home county, rather than simply paying for a bus or train ticket and abdicating from any further responsibility.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

The costs and benefits of each proposal set out in the Regulatory Impact Assessment seem fair and comprehensive.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

Yes, the statutory duty to identify, refer and cooperate will be a valuable tool to promote the cross-sector collaboration needed across all public services, for the holistic, person-centred response to homelessness.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

We believe that the list of public bodies proposed in the white paper to assume the duty to identify refer and co-operate is a good starting point. Social services departments and registered social landlords are

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

obvious inclusions, as are the Local Health Boards. Although primary care services are singled out as a priority area here, we would also advocate strongly for the duty to apply equally upon secondary care services too, in particular for specialist mental health and substance use services. We would also like to explicitly include services such as health visitors and community nursing, which can often be a key trusted point of contact who can effectively signpost and refer on to other services.

We also agree that the eight non-devolved organisations and bodies identified in the white paper also ought to be subject to the duty to identify, refer and co-operate. Whilst we recognise the complexity of enforcing this duty whilst the Welsh Government lacks the powers to legislate in these areas, it should be readily apparent to each of those bodies that it is their interest to co-operate and prioritise prevention work. Failing to prevent an individual from experiencing homelessness will obviously have a greater financial impact later down the line, as demands for their services could increase in volume and complexity.

We note that education has been excluded from the list of proposed relevant bodies to be subjected to the new duty, because of a pre-existing Government policy to reduce the administrative burden upon teachers. However, we believe that to exclude education would be a missed opportunity. In particular, we believe that Pupil Referral Units and schools for pupils with special educational needs must be included in this duty, due to the disproportionately high numbers of young people in contact with these specialist services who go on to experience homelessness later in life. We also believe that Welsh universities have role to play when identifying students at risk of homelessness and referring them to the most appropriate services.

The Expert Review Panel recommended that private landlords should also have a duty to refer tenants at risk of homelessness, and this is something we would also strongly support given the high number of homelessness presentations resulting from evictions in the PRS. The ambition to end all evictions into homelessness within the social rented sector is an important one, and we would like to see this ultimately extended to all forms of tenure. A duty for private landlords to identify and refer could be a useful tool for progressing this agenda. We note that the Welsh Government has not included such a duty in its white paper proposals, preferring instead to consider this as part of parallel policy development in relation to adequate housing, fair rents and affordability. We can accept this, so long as it does not lead to undue delays, as this could leave PRS tenants at disproportionate risk of homelessness without these protections.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

It will be difficult to determine whether an appropriate balance has been struck until the legislative changes have been implemented and we can assess the extent to which public bodies are effectively acting under the new duties. We will expect the Welsh Government to keep a close eye on the relevant bodies after implementation to ensure that the changes are having the anticipated effects.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

The Welsh Government needs to develop robust guidance for all affected public bodies, based upon the best practice found in existing partnership arrangements, to ensure that they are able to effectively collaborate to support clients at risk of homelessness. This will be a significant cultural change for

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

organisations that are used to silo working and considering their work in isolation to that of the wider public sector, and needs to be given time, resources, and continuous championing by senior strategic leaders. In the current financial climate of shrinking budgets and growing demands, there must be a relentless focus on preventative working, and an acknowledgement that proactive, collaborative work now will ultimately save money in the longer term. Staff need greater assurance that budgets will be maintained over multiple years in order to deliver these long-term preventive services, but instead face short-term temporary contracts and the need to fight each year just to maintain frozen budgets.

Training for staff who are not necessarily experienced in housing and homelessness issues will be vital. However, we feel that there are opportunities for this to be delivered in line with existing training programs being rolled out to Welsh public services. For example, training is currently being rolled out for the Trauma-Informed Framework for Wales, across all public services, and there could potentially be significant cross-over between this and new training around identifying those at risk of homelessness. Similarly, there may be efficiencies to be had by incorporating this training into the curriculum for existing safeguarding training.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

We believe that enhanced case co-ordination for people with multiple and complex needs would be a significant benefit for the people we support, as many (if not most) people experiencing or at risk of homelessness are typically in contact with several different services to receive support in different areas. Case co-ordination could provide more person-centred support, that is able to engage the right agencies at the right time, reduce duplication and delays, and mean that clients do not need to constantly redisclose their personal circumstances and histories of trauma to each new agency they are in contact with. A single trusted advocate could be empowered to ensure that they get just what they need.

The Expert Review Panel recommended that the enhanced case co-ordination approach should be available for any individuals in contact with two or more services, whereas the proposal in the white paper is for individuals in contact with three or more services. There is a risk that a significant number of individuals could miss out on vital person-centred approach as a result of the latter proposals, which we believe ought to be made available for anybody who needs them. Rather than arbitrarily restrict this support based upon the number of services an individual is in contact with, access to case co-ordination should be based upon the needs of the individual, wherever it is considered that it may be beneficial. If this service is restricted to clients in contact with multiple services, the Welsh Government must clearly define which services will be counted and which disregarded (for example, would the service recognise engagement with food banks, religious and community groups, or other non-statutory services?)

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

The costs and benefits of each proposal set out in the Regulatory Impact Assessment seem fair and comprehensive.

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

The seven distinct groups of people identified in the white paper as being at disproportionate risk of homelessness is a good starting point, and we agree that each of these groups is deserving of special consideration. We would like a little more detail on how rigidly each group will be defined; for example, would people experiencing mental illness only include those with formal diagnoses, or would it also be flexible enough to include individuals with undiagnosed conditions?

We note that there is considerable focus in this section on the needs of young people at risk of homelessness, which is something we strongly support given the number of different agencies involved, as well as the importance of early intervention to prevent a lifetime of difficulties in the homelessness system. We support the particular focus on continuity of care for 16- and 17-year-olds as they navigate the transition from children's to adult's services, as it is essential that we close these gaps in provision where young people can fall through the cracks and become disengaged from the support they need.

We believe that there are a number of other groups with intersectional needs not included here, that may also require further consideration to ensure that they are not disadvantaged by inaccessible or inappropriate service provision.

Firstly, services must be available for neurodivergent people, including those with diagnosed or undiagnosed autism, ADHD, dyslexia, and dyspraxia, as well as people with acquired brain injuries which can cause similar difficulties.

Secondly, consideration should be given to ensure services are available for older people, particularly those with specific needs around loneliness and isolation. We have found that older people, especially those who are bereaved or otherwise single, can often have reduced social support networks and see less of their family and friends, meaning fewer opportunities for someone to notice when they are struggling. Older people are also more likely to have specific health and care needs that may be harder to access when homelessness or insecure housing is also a factor.

Thirdly, we believe that there should also be recognition of the role of race as a risk factor for homelessness. Black, Asian and other non-white people are disproportionately more likely to experience homelessness. As well as Gypsy, Roma and Traveller communities, where services are often unsuited to meet their specific housing needs. Where services are unused to supporting people from diverse backgrounds, staff may have unconscious biases or may unintentionally create additional barriers to engagement.

Finally, Welsh Government should ensure that legislation is inclusive of the specific needs of LGBT+ people, particularly trans and non-binary people who can face particular barriers in accessing appropriate services, despite being at an increased risk of homelessness. In our experience, LGBT+ people can often have a distrust of mainstream services due to past failures, which means that they may opt for unsafe or unstable accommodation options over what is on offer from local housing services.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

The Expert Review Panel recommended that statutory guidance published by the Welsh Government ought to be amended to provide more clarity to local housing authorities in the application of the Public Sector Equality Duty to the homelessness system (ERP Recommendation 17). This should provide detailed examples of the sort of targeted work that authorities need to carry out to ensure that their

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

services are accessible and appropriate for the groups identified here as being at a disproportionate risk of homelessness.

Another recommendation made by the Expert Review Panel but not currently included in the White Paper proposals concerned referrals between housing and mental health services. Recommendation 123 proposes that local housing authorities and support workers are added to the list of agencies able to make a direct referral for an assessment with Local Primary Mental Health Support Services, under Section 6 of the Mental Health (Wales) Measure 2010.

We know that people experiencing homelessness disproportionately suffer from poor mental health but can face significant barriers in accessing the right support. The ability of housing support workers to directly refer clients for an assessment would be genuinely revolutionary, speeding up the process of getting support in place, and addressing the gatekeeping that currently occurs for people with the most complex needs.

Alternatively, we would like to see Welsh Government legislate to allow mental health screening as a standard part of the homelessness application process: upon presenting to a local authority as requiring homelessness relief, individuals would be automatically referred for a mental health assessment. We believe that the scale of the mental health crisis within homelessness more than justifies such an intervention.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

We have no strong view on the proposals related to children and young people, as the majority of our services are targeted at adults only. Nevertheless, we recognise the importance of getting the right support in place for young people and agree that work to streamline homelessness legislation alongside provisions within the Social Services and Wellbeing Act will be important to ensure early prevention work for care-experienced young people who face a disproportionate risk of homelessness. We have argued elsewhere in this response that the safeguarding duties introduced by this Act could form a useful model for all public services to consider the risk of homelessness amongst the people they support.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Yes, a legislative duty to identify, refer and cooperate should ensure that social services and local housing authorities work together to deliver joined-up services. Successful cooperation will depend upon robust guidance setting out expectations from all parties, as well as training and resources to ensure that all staff understand their role within the wider system.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

We do not have a firm view either way on this proposal, as although there are obvious benefits to treating 16- and 17-year-olds equal with adults in terms of their ability to hold and maintain a tenancy, there may also likely legal complications arising from this change. In our experience, age is a fairly arbitrary criteria upon which to determine whether a tenancy might be appropriate, so extending the legal right to 16- and 17-year-olds could be a precursor to allowing housing support services to exercise more discretion based upon their judgement of an individual's personal circumstances.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

The costs and benefits of each proposal set out in the Regulatory Impact Assessment seem fair and comprehensive.

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

We support the proposals to improve the suitability of accommodation, both temporary and long-term settled housing, as all properties used for the discharge of homelessness duties must be fit for human habitation, and free from Category 1 Hazards and overcrowding. We also support the proposal to standardise legal requirements for accommodation regardless of whether it is owned or managed by local authorities, Registered Social Landlords or private landlords.

We are broadly supportive of the ambition of the government to prohibit shared sleeping space in all circumstances, however we feel that there may be rare situations where this could be acceptable, if there are no other accommodation options available, during extreme weather events, or if it is the preference of the individuals being accommodated. At the current time of extreme pressure on homelessness services, we know that shared sleeping space is being used in some places, and that is typically because it is the only alternative to sleeping on the streets.

We strongly support the principle of building choice into the system, as when services are able to take account of an individual's specific needs, that placement is much more likely to succeed. We have heard many examples of individuals and families being offered temporary accommodation far away from their existing social networks of family, friends, work and school. The expectation that they should entirely uproot their lives is just not fair or realistic, and they are more likely to choose sofa surfing or even rough sleeping in order to stay in their preferred area.

We agree with the proposal that young people under the age of 25 should not be placed in temporary accommodation without wrap-around support, and would prefer the Government to go further, and ensure appropriate support is offered to everyone in temporary accommodation, regardless of age or circumstances. Homelessness is often a result of traumatic life events, and is also a trauma itself, so everybody who comes into contact with the system must be assessed and offered appropriate support, particularly for physical and mental health needs, substance use, and criminal justice needs. All temporary and long-term supported accommodation should be classified as suitable for residents with low, medium, or high support needs, in line with the national Rapid Rehousing strategy.

We also support the proposals around ensuring accommodation is culturally appropriate (in particular for

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

people from Gypsy, Roma and Traveller communities), the proposal to formalise a 'Homeless at Home Scheme' to allow applicants to remain in accommodation whilst accessing support, and plans to improve data collection around TA stock and availability.

The proposals should ultimately have the effect of improving the quality and increasing the supply of all different accommodation options, to allow services to deliver more person-centred support and solutions. But of course, legislation change is only part of the picture here: Welsh Government also needs to provide more investment in order to drive these improvements, as currently the system is running at full capacity, with very little opportunity to carry out property renovations or offer choice to clients in desperate need.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

We strongly support the proposal to make clear that RSLs cannot unreasonably refuse a referral from a local housing authority when they have a vacant property that could meet the needs of the individual. The similar provision in the corresponding Scottish legislation has proved to be a useful tool in ensuring RSLs play their role in rehousing people who have experienced homelessness.

In our experience across Wales, we have had a mixed response from different housing associations in different areas: whilst some have been willing to offer tenancies to the people we support who may have a range of support needs, others have set unrealistically high thresholds in order to cherry-pick tenants that they see as more stable. This poses particular challenges to rehousing clients with challenging behaviours, substance use, or criminal records, who could benefit most from a stable home environment.

We also support proposals to create Common Housing Registers for each local area, standardise how homeless households are prioritised within long social housing waiting lists, and more clearly define 'unacceptable behaviour' to ensure that individuals are not unfairly barred from accessing social homes.

We do not support the proposal to create a new 'deliberate manipulation' test within the housing allocations process, which may simply reintroduce the intentionality test by another name. This risks creating a culture of blame, shame and stigmatisation, which may inadvertently erode trust in the homelessness system amongst those who need it most. We understand that pressures on public finances and high demand for services has led to a rationing mentality, but we must resist the instinct to impose more barriers and restrictions, creating excuses to withdraw support rather than prioritising inclusion and accessibility.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

We are comfortable with increasing the range of housing outcomes through which the section 75 homelessness duty can come to an end, in order to allow greater flexibility in the support that can be provided.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

The costs and benefits of each proposal set out in the Regulatory Impact Assessment seem fair and comprehensive.

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

The proposals to strengthen scrutiny and regulation of housing and homelessness services are welcome, as this is an area that we have felt to be lacking for some time in Wales. In many situations, the services offered in long-term supported accommodation for people with the most complex needs can feel almost akin to social care, and yet are not subject to anything like the same levels of regulatory oversight.

Additionally, when decisions are taken by local authority commissioners which we feel are counterproductive or out of line with national strategy, there are limited avenues for scrutiny or appeal. Local authority scrutiny committees typically have a wide scope of responsibilities, so are only ever able to dedicate a small amount of time to consider homelessness policies and service performance.

The approach outlined in the white paper, to strengthen regulation of local housing authorities and registered social landlords, is a sensible starting point, but any independent regulator needs have 'teeth', to hold services accountable for their decisions, and ensure that individual organisations are not pulling in an opposite direction to the Welsh Government and the national, sector-wide ambitions to deliver evidence-led, trauma-informed, and person-centred support services.

The proposal to consider the roles of other regulators such as Care Inspectorate Wales and Healthcare Inspectorate Wales is also welcome, to ensure that other parts of the health and care system are also working towards the same priorities as set out elsewhere in the White Paper. Welsh Government should also consider what oversight is needed to ensure standards are maintained by third sector service providers, who would not fall into the RSL category, but may be acting in both the capacity of landlord and support provider in supported accommodation projects. At present organisations in this position like The Wallich are covered by Rent Smart Wales licenses, but there may be more appropriate tools to ensure compliance with national homelessness priorities.

As identified in this section, it is also very important that the views of people with lived experience of homelessness is taken into consideration when developing new services, as well as evaluating the effectiveness of existing services. At present this is considered to be good practice, and coproduction is encouraged through the Housing Support Grant guidance, but it is often the first thing to fall by the wayside when time and resource pressures are high. The Welsh Government should put the requirement to coproduce services on a statutory footing, as well as share good practice and practical tools to help organisations with less experience embed this approach.

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

As identified in the White Paper, the Public Services Ombudsman has some powers to hold local authorities accountable for their homelessness services, however this is only a small part of their role providing wider oversight of the range of other services delivered by public bodies. Similarly, Audit Wales

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

have some powers to investigate financial and governance issues in local authority homelessness services, and have the power to demand improvements, however again this is only a very small part of an extremely broad scope of interests, meaning that there are still opportunities for poor practices or performance to be missed.

We would be content to see the powers of either or both of these bodies strengthened, alongside the provision of extra financial resources, in order to carry out greater scrutiny of homelessness services across all 22 local authority areas. Alternatively, this independent scrutiny function could be carried out by another existing body or a new organisation entirely such as a social housing regulator, but it will be important to avoid duplication of responsibilities and unnecessary governance complexity.

Beyond this, it does seem like there is a role for the Welsh Ministers to act as the ultimate backstop, with the power to call in decisions and demand improvements to ensure all partners are working to the letter and the spirit of legislation and national strategy. A good example of a time when this could be needed is the recent decision of Cardiff Council to begin enforcing the intentionality test, in opposition to this White Paper, the report of the Expert Review Panel, and many other commitments made across the sector recommending that intentionality be scrapped. Whilst this particular example is in line with the current legislative requirements upon local authorities, it is not in keeping with the national direction of travel and suggests that Welsh Government needs additional powers to ensure that their considerable policy work towards ending homelessness is not undermined by the decisions of individual councils.

Finally, we strongly support the proposals to develop stronger data collection and analysis in order to better understand the drivers of homelessness and the effectiveness of specific interventions. The work going into the Ending Homelessness Outcomes Framework will be essential in developing more evidence-based services, ensuring our efforts are focussed where they can have the greatest impact towards ending homelessness in Wales.

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

The costs and benefits of each proposal set out in the Regulatory Impact Assessment seem fair and comprehensive.

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

We have no particular view on the effects of the proposals on the Welsh language, as we do not believe they would have any significant positive or adverse effects.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Nothing further to add at this time, but we are grateful for the opportunity to engage with the work of this White Paper, and we are looking forward to engaging further as the Welsh Government prepares its draft legislation.

Response 35

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

We believe that the proposals will lead to this, yes, although we have some comments and points of clarification.

- Our members are very much in favour of the proposed duty to support a person to retain accommodation. We know that sufficient Housing Support Grant will be a prerequisite in making this important legislative change work in practice.
- We understand that 12 months is suggested as a duration for the duty as it aligns with contracts in the Renting Homes (Wales) Act 2016, but would suggest that either the legislation or guidance should require the LA to seek the views of the landlord that the tenancy is sustainable before ending this duty.
- Personal Housing Plans (PHPs) can make homelessness services more person-centred and make it more likely that the tenant will be able to maintain their tenancy, but it does rely on housing professionals having the 'capacity and capability' referred to in the White Paper. This will require sufficient resources, guidance and support from the Welsh Government to LA teams.
- PHPs can and should support better matching of person and home. HAs note that a key reason for a failed tenancy is location/distance of a property from an applicant's support network. PHPs should allow for more thoughtful matches which recentres the system to allocate to set people up for success.
- We would appreciate clarity on whether a NoSP equating a threat to homelessness will apply to all social landlords, including LAs (as per point #67).

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

N/A

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes, we agree with this proposal, and note the following:

- We can learn from the pragmatic approach already operational in some local authority areas, specifically for those fleeing domestic violence or those who are employed in a borough.
- It will require joint working and communication between different LAs to make referrals for applicants without local connection. Clear statutory guidance will be very important here to make sure the spirit of legislation is reflected in practice.

Further comments for Qs 4 & 5:

Our members are in favour of abolishing priority need, but recognise that this will need to be implemented following through a planned, phased approach. This should include:

- Sufficient lead in time of at least 5 years, with careful consideration of the requirements to implement this policy ambition in practice whilst mitigating unintended consequences. We would point to learning in Scotland regarding the length of time needed to implement such a significant change.
- Sufficient resource for statutory homelessness services and support services, in order to avoid overwhelming already stretched services and staff
- Learning lessons from both successes and challenges from the No One Left Out period.

We have no objection to abolishing the intentionality test, and recognise that its use does not support the trauma-informed approach we are collectively committed to.

Our members are concerned that, while they are/will be used at different points in the process, the deliberate manipulation test proposed later in this White Paper feels similar to the intentionality test that will be abolished. We consider that more work could be done to explain how they differ, and the Welsh government's vision for what will improve outcomes for people.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

N/A

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

Yes, we agree with these proposals and believe they support holistic, person-centred and trauma-informed working. We note that:

- This area will require significant investment on an ongoing basis. Sustained funding and certainty beyond one year is especially important for relationship-based roles such as housing support staff and the school Family Engagement Officers mentioned in this chapter.
- We would welcome consideration of how much non-housing professionals will be expected to understand in order to fulfil this obligation. There will need to be clear parameters and boundaries, as well as

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

appropriate and proportionate training. This should be a priority for consideration as part of plans for implementation.

- We agree that the duty to refer should be acted upon quickly, but would urge caution around potential unintended consequences where staff focus on referring quickly but perhaps not being able to take a person-centred approach and understand what is important to that person. It would be helpful for guidance to provide clarity and support on this.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

We are supportive of RSLs/HAs being included in this list, as the strengthening of the existing duty to cooperate as part of a wider partnership landscape will formalise and underpin much of the work already done in the sector. We suggest that:

- There will need to be clear referral pathways for each LA.
- The police and criminal justice partners will be part of the multi-agency effort, and there are many examples across Wales where HAs and local police work very effectively together. However, there are striking differences in policy direction between WG devolved housing and homelessness vs UK Govt reserved policing, criminal justice and ASB management. We would welcome careful thought about this growing tension.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Somewhat. We note that:

- The balance mentioned in Q10 does not just apply to health but to other public services too.
- Regional Partnership Boards (RPBs) should take an active role in coordinating and strategising the homelessness response in their operating areas. The role of Public Service Boards (PSBs) and complex needs boards should also be considered. Recognition and involvement of housing and homelessness services in these spaces currently varies across Wales. Currently there seems to be strategic buy-in within the regional partnerships, but this has not yet translated to the operational level.
- There is support amongst our members for developing multi-disciplinary teams within LAs to respond to homelessness, as has been done in areas of RCT and Cardiff & Vale. Proposed reforms should create the conditions for effective partnerships, and there is existing good practice across Wales we can learn from.
- It will be important to establish common thresholds for support across partners, as without them each profession/public body could take their own view.
- To support effective partnership working, we would encourage the Welsh government to consider education, awareness and training for key stakeholders as a key part of implementation plans to encourage productive partnerships. A lack of universal language amongst professionals is currently, in some cases, affecting a person's ability to access sufficient housing and support services.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

We observe that:

- These duties must be adequately funded and transitioned to, if they are to be effective.
- Guidance around point #243 (that the listed bodies must cooperate) would be welcome, indicating who decides what counts as 'a good reason', what happens if there is a disagreement and whether a lack of resource/capacity will be an accepted reason for not cooperating.
- The Welsh government should consider whether the new duty to refer should be not just for a risk of homelessness, but also for the recognition of housing precarity or other need (e.g. overcrowding or lack of adaptations).
- More information around the proposed duty to sustain tenancies would be valuable, particularly on how needs are assessed and action/support monitored, the timeframe and what happens if support needs 'flare up' again soon after this action/support ceases. We would suggest that the role and views of the landlord should be taken into account by the LA when considering how it implements this duty, especially regarding if and when it is appropriate to discharge the duty.
- Point '246 (regarding the ending of cooperation) is currently quite vague, and we would welcome detailed guidance on what happens if different bodies cannot agree. Ideally decisions would be made in partnership, of course, but extreme pressures can cause tensions. Also, we would hope that ongoing cooperation does not end on the basis of one decision by one party.
- Clarity would be welcome on who will assess the application of the duty to support, and decide who requires support to retain their accommodation (as outlined in point #171). This should include the mechanism (e.g. PHP) and whether this will be reviewed at regular points or just at the start, as well as the stakeholders involved. We suggest that the views of the landlord should be carefully considered here.
- The duty to support ends at up to 12 months' into the tenancy but the LA 'should be able to end the duty on the basis it is satisfied there is no obvious risk of the contract failing.' Guidance would be welcome on who will decide there is no obvious risk, and whether this will be in consultation with HAs/partners and the tenant. We consider that this should be in consultation with the landlord, and that LAs must have a requirement to have due regard to the views of the landlord when considering whether to discharge the duty.
- Our members find that it is currently relatively straightforward for HAs to refer to LAs and vice versa, but very difficult for HAs to refer to Health or other services. We need to consider a central referral point or pathway, whether through the case coordination and multidisciplinary teams proposed in the White Paper, or another mechanism. Otherwise, there is a risk of referrals getting lost or delayed and people not receiving the support they require to live well in their home and sustain their tenancy.
- Our members have raised that often when they refer a person/household to statutory services, support or assessments tend to go back to stage one. This is entirely unhelpful to the individual and the organisation as repeating work does not provide value for money, and we suggest that any guidance reflects this. HA staff members' assessments should be valued and recognised, as should other partners. This could also be supported by further discussions around data-sharing between agencies.
- We must move away from the current pressures that are forcing HAs to serve NoSPs in order to access homelessness prevention funding and/or support from partners. This is far from trauma-informed, and overcoming it will require both resources and a review of support thresholds.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Housing associations are wholly supportive of the proposals to provide enhanced case coordination for those with multiple and complex needs. The people who are presenting to homelessness services are doing so with increased needs, at a time where demand continues to rise.

- Our recent cost of living report, *The Ends Won't Meet: the continuing cost of living crisis for social housing tenants in Wales* (<https://chcymru.org.uk/cms-assets/documents/Cost-of-Living-Report-2023->

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

(%E2%80%94ENG-1.pdf), demonstrates the varied and vital ways associations deliver tenant support, including financial wellbeing services, employability training and energy support. Our report also found that half of housing associations are delivering mental health support to their tenants, either directly or through work with other partners. Our members noted that for some individuals the support they can offer is not enough, and many of their tenants desperately need to access statutory mental health services. We hope that case coordination and better multi-agency working will help to facilitate this but ultimately we recognise that adequate resources will be essential to delivering it.

- HAs are fully supportive of the use of PHPs. This person-centred and trauma informed approach is invaluable in setting a person up for success as they move to settled accommodation. Regularly reviewed PHPs are crucially important to make sure nominations are based on accurate and up to date information about the applicant's needs and preferences. In our recent research, A study of housing association allocations in Wales, 14% of HAs noted 'change of circumstance' from the original application as one of the three main reasons an application would not proceed.

- It is vital that the Welsh government makes clear when multidisciplinary teams are appropriate and who will be accountable for deciding this. We consider that HAs should be able to request that a multi agency approach be taken from the LA, where the HA is landlord. We would also welcome clarity on which agencies are included in the 'three or more services', and whether statutory homelessness services count towards this total.

- We must also consider how we can improve case coordination and learn lessons from existing models that work well (e.g. MAPP) and look at already successful co-located services. We note that police presence is not always desirable here, as it can be counterproductive, although probation services are often helpful.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

The context and timing of this legislative reform is a significant consideration. We agree with the Welsh government that prevention is more important than ever. However, we must acknowledge and respond to the context in which these reforms will be enacted to ensure they have the greatest chance of success.

In recent years there have been successive crises, with little chance for our homelessness and wider public services to recover or regroup. We cannot underestimate the impact of this on individual or organisational resilience, and the investment required to build this back up.

Adequate funding and sufficient affordable housing supply are prerequisites of a homelessness prevention and alleviation system. An implementation plan, deliverable strategy, best practice, peer support and training are all acknowledged in the White Paper; these are all also vitally important. The process of implementation will be as important as the drafting of the legislation itself. Housing associations can play a key role here.

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

N/A

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

We have a few observations on the proposals in this section:

We are supportive of the proposal for a duty to help the applicant retain their existing accommodation, as long as the steps taken are genuinely person-centred. It must be the person/household's informed choice, and the home must be suitable with the required support in place for as long as it is needed.

HAs are fully supportive of proposals to ensure disabled people are served well and fairly by the system, including the use of accessible housing registers. We can learn from existing examples, such as ADAPT in Swansea and seek to scale this approach across Wales. Swansea Council hosts an accessible housing register, 'ADAPT'. More work should be done to learn from this approach and identify how it can be scaled so that people with physical disabilities in all local authorities can better access social housing. Guidance on said register will be necessary to ensure that appropriate and accurate information about the accessibility of a property is captured and to ensure consistency across areas. This will aid both housing providers entering properties onto the system and individuals who may be accessing it in multiple local authority areas. Our recent research, A study of housing association allocations in Wales (which will be shared with officials), evidences that more work must be done to understand how adapted properties can be let fairly and efficiently. 47% of HAs said that one of the most common reasons an allocations would not go ahead was because a property either did not have the necessary adaptations to meet a person's needs or a property was adapted and the applicant did not require these. Sufficient funding to carry out adaptations is a prerequisite.

We note that current pressures on both allocations to homeless households and adaptations/moves for people with disabilities are creating tensions between these two priorities, and would welcome conversations with the Welsh government and other partners around this. We must make sure that there are not unintended consequences for other groups who are not currently homeless but are in unsuitable housing.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

We believe that every young person who requires social housing should have the opportunity to stay in a specialised 16-25 year old supported housing facility, if that is what is best for them and is their choice.

Associations who deliver these services provide vital support to young people to teach them life skills and get them tenancy ready. Housing is often the final safety net for care leavers where other support services have withdrawn, and any problems sustaining a tenancy is often a consequence of the gap between these services.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

We are supportive of the proposal to strengthen existing corporate parenting responsibilities, assuming that the various services are funded appropriately to fulfil their obligations.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Yes, our members would be open to this proposal, with the following considerations:

- The prerequisites for a successful tenancy must be in place - the right home, in the right place, with the right support for as long as it is needed.
- We must be careful of multiple placements of young people into general needs housing schemes, when in reality a supported scheme might have been more suitable. A trauma-informed approach will be very important here.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

N/A

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

We support these proposals and believe these should allow for better, more sustainable matches of applicants and homes. We note that:

- It is vital that the LHA fully understands the home, location and community (and that they are able to take the advice of the HA), as well as the household.
- Housing associations are operating in the way described in point #482 already, but there are significant pressures due to a lack of adapted/accessible housing supply and adaptations funding being stretched by high demand.
- We are supportive of higher standards for temporary accommodation in future, as per point #499. We would welcome more information on likely timeframes here, and on what will happen if housing supply does not recover for many years.
- Regarding point #511, we would like to understand the Welsh Government's intention for these proposals if reliance on temporary accommodation does not reduce (as we all hope it will).
- We agree with the impacts described in point #508, but would add that others are also adversely affected by an unsuitable match - this includes others in the household, neighbours, the wider community and housing support staff.
- We are wholly supportive of the proposal around reasonable travelling distance. Placing someone into an unsuitable home might mean their experience of homelessness is brief (or briefer), but it may not be unrepeatable.

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

- Regarding the exemption described in point #514, we would welcome guidance on what this exemption would cover, and for what time period. We wonder if there might be a risk of over-reliance on this exemption, and would be keen to guard against this.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

We strongly disagree with the proposal for more muscular powers for LAs in terms of RSL allocations, and believe this should be removed. We support the outcome being sought, but legislation is the wrong vehicle and this risk of unintended consequences is high.

Evidence from Scotland shows that with Section 5 in place the variation in lets to homeless households remains. This indicates that the issue is not an obligation to work in partnership, rather that demand is vastly outstripping the supply of suitable homes. The Scottish review recommends focussing attention on other mechanisms, particularly strengthening partnerships and developing common allocations policies.

There are more effective, quicker ways to achieve the goal of allocating more homes to homeless households. CHC and our members are committed to working at pace with government to explore and implement non-legislative options. This could include the role of regulation and data collections, and maximising CHRs and CAPs.

We cannot support this proposal, for several reasons:

- 1) We do not yet understand the reasons behind the topline statistics, including the variation in allocation rates, and do not have sufficient evidence to take such a big step.
- 2) The most important outcome is a good match between a person and their home. This means a suitable property and a sustainable tenancy.
- 3) If we are housing only homeless people, that means we are not housing people who are in acute housing need and may themselves become homeless as a result. This risks pushing people towards crisis, rather than working to prevent homelessness.
- 4) HAs know their homes and communities, as LAs know the applicants and their needs. The proposed duty would undermine the power of the partnership.
- 5) There are easier and quicker ways of achieving the goal of housing more homeless people, that protect against unintended consequences such as reclassification.

Below we explain and evidence these reasons in detail.

- 1) We do not yet understand the reasons behind the topline statistics, and do not have sufficient evidence to take such a big step.

The evidence base does not support such a significant change with so many unintended consequences. The White Paper states that Scotland's Section 5 'has proved to be an important tool in providing access to housing for people owed a statutory homeless duty'. We do not consider that the evidence wholly supports this assessment, as the review of Section 5 undertaken by Scottish Government Social Research (<https://lx.iriss.org.uk/sites/default/files/resources/0080284.pdf>) is unclear as to the success and impact of the measure:

- Scottish Government analysis shows that just under a quarter of non transfer lets were made to statutorily homeless households in 2006/07, ranging from above 50% in one LA to under 15% in another. The review states that 'This range is even greater between individual RSLs, with some RSLs reporting more than 70% and some under 5% of non-transfer lets as made to statutorily homeless households in

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

2006/07'. We can conclude from this data that, even with Section 5 in place, the variation in lets to homeless households remains, suggesting that the issue is not an obligation to work in partnership.

- 'It is worth noting that the proportion of lets made by an RSL to statutorily homeless households does not appear to be affected by whether the referral has been made using Section 5 or another mechanism'. It appears that Section 5 does not provide a clear route to the goal of increasing the proportion of lets to homeless households.

- The report also explains that: 'One area of obvious tension between local authorities and RSLs arose when an RSL declined to make an offer to a statutorily homeless household that had been referred to them. It was evident that differences of opinion were often resolved after informal discussion.' We believe this demonstrates the need for open conversations as part of a true partnership, and active consideration should be given to the conditions that support effective partnership

- The review implies that Section 5 referrals may not be needed at all if an area has a Common Housing Register (as this White Paper proposes to be the case): 'In some areas the wider allocations arrangement, in particular the existence of a CHR or the adoption of Choice Based Lettings (CBL), rendered referrals unnecessary.'

- 'Analysis by a wide range of characteristics and factors... showed very few patterns which could help explain the variations in approach, practice or views on effectiveness.' - It proved difficult to assess whether S5 had been successful.

- 'The current Section 5 Protocol should be replaced with a guide to developing an agreement between the local authority and local RSLs that sets out how RSL housing in the local area, by whatever route or mechanism, will be made available to statutorily homeless households. This should include agreement on respective roles and responsibilities, expected contributions to providing housing to statutorily homeless households, referral processes, and information exchange arrangements.' We would urge the Welsh Government to learn from Scotland's experience so far. The 'agreement' described here sounds a lot like a Common Allocations Policy, which we believe would provide a far more flexible and constructive route than a Section 5-type power, as well as encouraging the productive, transparent partnerships required to make maximum progress.

Point #551 of the White Paper states that the co-commissioned research 'identified clear disparity between nomination rates and allocations as an area of concern' and that 'it isn't always clear what causes the divergence between nominations and allocations.' We feel strongly that this is an area that we all need to better understand, rather than act on with the blunt tool of legislation before we have all the facts. There are many reasons for lower numbers of homeless direct lets/allocations to homeless households, including a lack of appropriate supply and a lack of available support. Anecdotal information in this space is useful, but not sufficient for evidence-based policy decisions for such significant changes.

The allocations research the Welsh Government has commissioned to Alma Economics, and which HAs look forward to supporting, should shed light on the many unknowns acknowledged in the consultation paper and provide more robust evidence on which to make a decision on future policy and legislation. We feel strongly that a decision on whether or not to proceed with this proposal should not be taken until this improved evidence has been gathered and interrogated, and that our own sector research demonstrates how complex the decision making for each individual allocation can be.

2) The most important outcome is a good match between a person and their home. This means a suitable property and a sustainable tenancy.

Suitability is a vital consideration when finding accommodation for any person or household, and this applies regardless of the duration or support level of the placement. Only through good matches can we ensure that, where it cannot be avoided, homelessness is unrepeatable as well as brief.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

We cannot lose sight of the right outcome for individuals, and we must respect individual choice. Housing associations believe that it is generally better to place someone in the right home, which may not always be the 'fastest' allocation, as this is more likely to result in a sustainable tenancy. This approach reflects person-centred and trauma-informed practice.

We are concerned that a blanket power to require placement would put this sensitive and person-centred approach at risk. There are many examples of good quality partnership working which does not rely on legislative powers such as this.

Some members have suggested that 'starter tenancies' and/or 'retained homelessness status' for homeless applicants would be important tools to help them find the right matches. This would mean that if a tenant has a false start in their tenancies it would be easier to move them to alternative properties without re-entering at the starting point of the allocation process. This would of course need to be used carefully to avoid excessive moves for an individual.

Lack of suitable housing at present is reflected in the varying numbers of homeless lets, as highlighted in the co-commissioned research (Allocations: Understanding more, in the context of homelessness in Wales). Homes can become more suitable, and tenancies more sustainable, if the right support is in place. Therefore, rather than forcing providers to allocate unsuitable homes to people, it is imperative we consider how we can better use support mechanisms like wrap-around support to maintain tenancies.

CHC's recent research, A study of housing association allocations in Wales, found that the most common reasons a HA refused a nomination to a particular home were type or size of a property, a lack of adaptations or unnecessary adaptations, unsuitable location (e.g. the property was too far away from the applicant's support networks) and historical challenges with an applicant. This includes previous ASB, serious arrears and previous convictions. Importantly, however, none of these scenarios would mean an applicant will never get a social home, or even a home with that particular social landlord; it simply means that associations would need to consider an allocation more carefully to ensure they find a match which responds to the needs of the applicant and maintains balance within communities. For example, if there is an area where there have been high levels of ASB due to several Registered Sex Offenders (RSOs) being 'outed' in a community and there is another nomination to a homeless applicant who is also an RSO, then a housing association may consider a property in that area unsuitable and would find them a home in a more appropriate location.

We support the consultation's proposal to exclude historic instances of ASB and arrears in allocating homes, as outlined in point #556, as long as it is understood that additional support may be needed to sustain the tenancy.

CHC's recent research has shed some light on the support needs of people who were allocated homes, and this is an area we will be exploring further:

- 27% were experiencing mental health issues.
- 23% had poor financial resiliency.
- 23% had 'Other' support needs.
- 8% had multiple complex needs

3) If we are housing only homeless people, that means we are not housing people who are in acute housing need and may themselves become homeless as a result. This risks pushing people towards crisis, rather than working to prevent homelessness.

The proposed legislative tool is a blunt instrument which risks baking in a crisis response. To ensure we achieve our shared aspiration for homelessness to be 'rare, brief and unrepeated.' We must seek to provide support as early as possible and protect access to social homes to people in acute housing need, including but not limited to those already classed as homeless.

Our research sheds light on the complexities of housing challenges facing those that are allocated social

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homes. There is no evidence that HAs are not allocating to those who have housing need or are facing housing crisis. There are significant unintended consequences if we simply focus on crisis response and restrict our collective ability to prevent homelessness by acting upstream (for example in cases of overcrowding).

HAs strongly believe it will benefit no one to build a system that encourages a 'race to crisis' or 'point scoring'. We agree with the prevention of perverse incentives, as stated in point #565, but suggest that we also need to be careful of adding stigma to social housing. This proposal uses a fairly irreversible measure that would undermine a great deal of work undertaken in recent years.

Housing associations allocate homes to people in a variety of ways and for different reasons, as evidenced by our recent research, A study of housing association allocations in Wales:

- 45% of allocations were going to those who were owed a statutory duty, reflecting an understanding of the need to support those already experiencing homelessness.
- Where applicants were not owed a statutory duty, nearly half were considered at risk of homelessness within six months if they had not been housed at that point.
- 33% of allocations were made to people living in temporary accommodation, 18% to those living with family and friends and 4% to people who were sofa-surfing.
- 19% of allocations went to people already living in social housing. There are many reasons why someone already living in a social home may have an urgent need to move, for example when circumstances change meaning that they are over or/ under occupying or in relation to health and accessibility needs. HAs are concerned about the current inability of social housing tenants to move in such circumstances. Retaining flexibility for internal moves is also a key part of the sector's commitment to limit evictions into homelessness.

4) HAs know their homes and communities, as LAs know the applicants and their needs. The proposed duty would undermine the power of the partnership.

RSLs are the experts on their homes and their communities, as well as on where there is housing need and early risk of homelessness due to unsuitable housing among their existing tenants. LAs will have the best understanding of applicants' needs, but they cannot be expected to have the same insight of the potential RSL homes available.

There are other stakeholders involved in each allocation decision. In the case of ex-offenders, for example, HAs have to acknowledge the views of local police forces and the existing community. HAs must consider the needs of neighbours and wider communities when allocating, for the safety and wellbeing of everyone.

As referenced elsewhere in our response, we already have examples of good practice and strong relationships between housing associations and local authorities, which could be developed and expanded. For the allocations process to work successfully there must be equitable relationships at senior and operational levels between all partners working in a local authority area.

Legislation is not the route to achieve this - there are other ways to drive transparency into the process and deliver on the policy intention of this proposal. The White Paper mentions that the legislative proposal seeks to bring about a cultural shift. We think there would be value in exploring what would drive this cultural shift, such as trust, transparency and mutual understanding, and how we can all support it. There is a risk that muscular legislation breeds adversarial, defensive interactions, rather than the robust, transparent partnerships required to make progress at pace.

Differences of opinion between partners when discussing the most suitable match for an individual are not necessarily unhelpful; this can ensure that there is a good balance of views, and that a rigorous approach is taken to allocations. As the review of Section 5 undertaken by Scottish Government Social Research states, 'Some challenge and some friction in a partnership may be important to ensure that some of the difficult issues which arise in relation to housing statutorily homeless households are

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

addressed rather than being 'smoothed over'.

On a practical level, we would welcome detail on what will constitute an 'unreasonable refusal' and 'specified circumstances'. For example, whether a lack of supply (that is appropriate and suitable) would be considered an acceptable reason. The White Paper mentions guidance that will be developed, and HAs are willing and able to help shape such guidance, should the proposal be taken forward.

5) There are easier and quicker ways of achieving the goal of housing more homeless people, that protect against unintended consequences.

Legislation is not the right lever to use to tackle the allocations challenge. Our members believe that focussing on accountability, transparency, information sharing and trusting partnerships would secure better outcomes for people.

We strongly believe there is no need or opportunity for disagreements around allocations when working within an agreed set of policies. One such route is the use of a Common Housing Register and Common Allocations Policy (also referred to as a framework or scheme), which this White Paper proposes to make mandatory. We support this, assuming resources are adequate to support it properly. We believe the use of a CHR and CAP would be sufficient to address challenges around the rate of HA allocations to statutory homeless households, and to achieve the desired outcomes, without the risk of adverse consequences inherent in legislation. This reflects the lessons learnt in Scotland. This approach would also avoid crystallising the risk outlined in the consultation paper around reclassification of housing associations as public bodies.

The CAP would allow transparency of decision making, as well as trust and honesty through challenging conversations. We would, of course, need data to hold all partners accountable in this framework or scheme. Our members recognise that CHRs are on the whole a good idea as they ensure a sole access point to social housing for service users and should make the system more efficient. However, for CHRs to be successful they must be adequately resourced and work alongside a common allocations policy or scheme. Any CHR takes a significant amount of resources to maintain and ensure it remains accurate, and there are concerns that some existing CHR lists are out of date. This means that sometimes a HA finds a home for an applicant, they move in and then their support needs are uncovered. We are hopeful that PHPs can be helpful here, but lists being up to date will make shortlisting easier and quicker.

There is good practice in the sector already in this space. The Single Access Route into Social Housing (SARTH) Partnership hosted between Denbighshire, Flintshire and Conwy LAs and five HAs across North Wales is one such example, including their triage process. Stakeholders that deliver SARTH are committed to continuous improvement. They are currently reviewing their approach and seeking to improve their services so that it is more user friendly, more accessible and more efficient. This is the type of practice that could be lost if legislation is made too prescriptive.

Another system to learn from is Tai Teg, a partnership project led by Grwp Cynefin that provides a central hub to access affordable housing (intermediate rent and affordable sale) by hosting a regional register for eligible people and allowing them to apply for properties. We believe that any legislation or guidance should be expressly informed by best practice, and we consider there is a role for the Welsh Government's Relationship Managers here.

Effective regulation, a code of practice and an active learning programme in place of legislation could all also be more impactful tools to make progress at pace, shine a light on what is working well and encourage continuous development

We have also reflected upon some of the other proposals in this section, and provide explanation below:
- 'power to remove people with no housing need' - some uneasiness
- 'deliberate manipulation test' - needs further consideration

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

(This section would not fit in this text box, so we will include it in the box for Q22 - apologies for any inconvenience.)

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

Removing applicants with no housing need

- Housing associations feel uneasy about the proposal for LAs to have the powers to remove people not in housing need from the waiting list, and struggled to understand what practical impact this would have.
- It is important that frank, honest discussions are had with applicants during the application process about the realities of their housing situation; how likely it is that they will be allocated a social home; and directing and supporting them to access other housing options (e.g. intermediate, PRS) if social housing is not the best or a realistic option for them.
- We would urge the Welsh government to consider the unintended consequences of regressing the positive work that has been done to improve the perception of social housing by including this power in the Bill.
- The assertion in point #557 (that anyone can register for social housing even if they are not in housing need) is not true. The 'openness' of registers currently varies across Wales. The SARTH partnership, for example, operates a system where only people with a defined and eligible housing need will be added to the social housing register.

Deliberate manipulation test

- HAs would welcome more detail on who would be responsible for making decisions around 'deliberate manipulation', and the criteria used for assessing it. They feel that this lever would rarely be used by individuals because of the risks involved in accusing a person of lying and/or making the wrong decision, especially in cases involving safeguarding, domestic abuse, etc.
- HAs are keen to understand how WG envisages the reasonable/additional preference and deliberate manipulation measures working, perhaps with some mapping of scenarios and how an applicant would interact with each test.
- HAs feel that the proposed deliberate manipulation test comes at too late a stage in the allocation process, not least because time and resources would have already been directed to allocating the applicant, so it would be more straightforward at that point for the applicant/tenant to stay. If deliberate manipulation was identified, would the social landlord then have to withdraw the offer of a tenancy or evict the applicant, likely back into homelessness? This would clearly be at odds with efforts to end evictions from social housing into homelessness.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

The White Paper notes the risks associated with the reclassification of housing associations as public bodies, and these challenges remain a significant concern to the sector. We do not feel that these risks have yet been sufficiently addressed or mitigated. This issue is not entirely in the Welsh government's

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

control, and the unintended consequences cannot be underestimated.

In June 2023, we provided Welsh Government with a summary of legal advice we procured on this issue, which identified a number of prudent next steps for the Welsh government:

- To engage with and inform the ONS about any material change which could impact classification. Legal advice we have received is that such significant legislative reform should be considered as a material change.
- To seek leading counsel opinion for a view ahead of tabling of any legislation, as these issues are complex with little authority or precedent.
- To engage with funders through UK Finance as a matter of urgency. There are potential significant implications of these proposals for the view taken by funders.

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

We appreciate the Welsh Government's acknowledgement that the financial and budgetary situation is very challenging at the moment, and we understand that the White Paper represents a long-term, aspirational view. The resources to make this ambition a reality are not available now. While we all hope that the budgetary situation will improve in the future, the delivery of the vision is not possible without sufficient resources, and if they are not there then we risk pushing the system and people further towards crisis.

Careful thought should be given to the potential phasing of each element of this reform. HAs alongside LAs are key delivery partners and must be involved in detailed discussions with the Welsh government to ensure sensible roll out phasing and detailed implementation. CHC would be happy to support this.

As mentioned earlier in our response, we must have strong, reliable data so that we can all understand the real picture. The data on allocations is currently patchy, and evidence from Scotland's experience of allocations legislative reform does not support the need for such significant change. CHC will soon be undertaking some work to understand how to improve the wider homelessness data landscape, exploring the essential components to build this clear picture.

In terms of allocations, our members believe that this involves a two pronged approach:

- Information about the applicant collected on the register. For example, do they require accessible/adapted accommodation; do they have complex needs; what agencies are engaged with applicants at time of application; the level of soft skills an applicant has.
- Detailed information held by the local authority about housing supply in their area (extending across tenures from social housing to the PRS). A local housing strategy shared by homelessness prevention teams and planning departments would ensure all facets of local government were working towards the same end goal. This could be tied into Local Housing Market assessment (LHMA) and local needs assessments. It is critical that these are up to date as they should inform distribution of funding homelessness services, including through the HSG.

Our research, A study of housing association allocations in Wales (referred to throughout this response), provides some insights into the many factors and considerations behind each individual allocation. The findings demonstrate clearly why it is so vital that both the applicant's situation and the nature of the property is well understood in order for a sustainable match to be made quickly and smoothly.

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

We must also consider how data can be shared effectively and proportionately. Personal Housing Plans are a vehicle to consider what level of information should support an application for housing, and which agencies should have access to this information.

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

The Ending Homelessness Outcomes Framework (EHOF): We are wholly supportive of this as a tool to ensure accountability across public services for the role that they must play in ending homelessness, including any consequences for public bodies not delivering on their obligations. We also must consider how the EHOF can link to existing frameworks such as the Public Health Outcomes Framework.

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

N/A

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

N/A

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

We understand that Welsh government budgets are unprecedentedly tight for the upcoming years. This means that it is even more pressing for the Welsh Government to consider the cost of implementation. Like other key services, housing associations are also bracing economic headwinds and must continue to endeavour to make the best investments they can on behalf of the communities they serve.

We must learn lessons from recent resource-intensive, expensive implementations, including the unanticipated costs of the Renting Homes (Wales) Act 2016, so that associations and both national and local government can continue to direct their resources to the services that need it the most.

Housing supply

We are fortunate in Wales that the Welsh government recognises and prioritises the value of social

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

housing, investing record amounts of capital funding into new affordable social homes for rent and working in partnership to find solutions. Yet building these homes has never been more difficult - and that the net worth of that substantial investment simply does not stretch as far.

We must utilise allocations as a tool to make the best use of housing stock. Our members noted that currently this can be made more difficult by reserved policies like the bedroom tax, which makes allocating small 2-bed flats difficult. We would welcome continued representation to the UK Government on this matter.

Data

We need improved data to ensure policy and legislative decision-making is evidence-based, and so we are able to judge the effectiveness of any future reforms. CHC has recently undertaken research around allocations. A copy of this report, A study of housing association allocations in Wales, will be shared with officials separately to this response. Later this year we plan to undertake research around ways to improve the overall homelessness data landscape, exploring the essential components to build a clear picture on which to base our decision-making.

Definition of homelessness

We would like to highlight a potential issue with the application of the definition of 'homelessness'. This could have huge implications for demand increasing, and could potentially be more impactful than many of the other proposals in the White Paper.

#57 states that 'a person shall not be treated as having accommodation unless it is accommodation which it would be reasonable for that person to continue to occupy'. The Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness (2016) describes this as including people who are 'unable to remain in, or return to, housing due to poor conditions, overcrowding, affordability problems, domestic abuse, harassment, mental, physical and/or sexual abuse'.

There are increasing numbers of people in acute housing need, including those in overcrowded homes or people with disabilities whose homes do not currently meet their needs. We consider that many applicants on the housing register, who are not currently considered a homeless applicant, would be captured by the definition: 'A person who has accommodation is to be treated as homeless where it would not be reasonable for them to continue to occupy it.' These households are in urgent housing need but would not be considered roofless, and may not be owed a duty depending on how the definition is being applied.

#206 describes research undertaken in England by Shelter that found 'more than three quarters (77%) of teachers surveyed had seen children who were homeless or living in bad housing at their school in the last three years. Seven out of every ten teachers (69%) had seen children who were living in overcrowded, unstable or poor-quality housing.'

We urge the Welsh Government to consider very carefully their definition of 'homelessness', and therefore who is owed a duty. We would welcome a wide definition that covers various types of housing need.

Role of different housing tenures

In order to end homelessness and address the current level of housing need, we will need a holistic, joined up approach across all tenures. We note that much of the White Paper focuses on social housing, which currently makes up around 10% of homes in Wales. While social housing is a key part of the solution, and housing associations are well placed and eager to play their part, we wonder whether all elements of the housing market have been fully considered. The work of the Senedd Local Government

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

and Housing Committee on the PRS could be helpful here.

Our members have highlighted that more work could be done to explore how intermediate housing options could be maximised. CHC's recent research, A study of housing association allocations in Wales (January 2024), found that only 2% of allocations in our cross-sector sample were intermediate housing options. Some people or households may be well suited for intermediate rent, especially if they have been able to afford a PRS tenancy rent. We would like to see social and intermediate housing stock considered in the round when finding the right match for a person or household.

Response 36

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No Response

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

No Response

Q5. Do you agree with our proposal to abolish the Intentionality test?

No Response

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No Response

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

25% of the homeless population are estimated to have been in care.(1) This demonstrates that care-experienced people are overrepresented in relation to homelessness and need to be given the right support from an early enough stage to plan their transition to adulthood and living independently.

We welcome the intention to 'strengthen existing corporate parenting responsibilities to ensure individuals aged 16 and 17 years who are homeless or at risk of homelessness do not fall between services'. This will hopefully provide a step towards ensuring that young people who need support are offered it at the right time and in the right way. We are encouraged by the commitment to partnership working within local authorities between housing and social services. Despite this we would like further information on how this partnership working will be different to that which is currently in place and whether there will be any further statutory requirements placed on services to protect young people who could potentially become homeless.

Whilst this is not an area of expertise for Barnardo's Cymru, we do offer a small number of homelessness prevention services and we know that young people are in need of support and advice. Caseloads for local authorities are high meaning that some young people are waiting significantly longer than they should be for support.

Currently, looked after young people aged 16/17 who will be transitioning from care at 18, are on the cusp of a drop-off in support that will likely be causing them significant worry and distress in terms of both their looked after status and support and the resulting housing support they are entitled to. This distress and worry cannot be understated. The move on process is not always managed in a way that is supportive or puts their needs at the forefront, with many changes happening in quick succession. This is exacerbated by workforce and capacity pressures within local authority teams which must be addressed.

We would urge the Welsh Government to strengthen the guidance available to local authorities to ensure that this transitional period for young people is more consistent, alleviating their distress and providing them with the confidence to move forward in the best way for them.

We recognise the challenges local authorities across Wales face with the need for accommodation often outstripping the availability of suitable placements. Despite this it is vital that young people are not placed in bed and breakfast accommodation regardless of how temporary this is. Bed and breakfast accommodation is most often unsupported, which can mean an at-risk young person is placed with little to no access to support or monitoring from a safe and trusted adult putting them at risk of exploitation or harm through a potentially unsafe environment (2).

Whilst Barnardo's welcomes any advances in the recognition and support made available to young

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

people, particularly those who have faced adversity in their childhoods - we would like to make clear just how important it is for all young people who have faced difficulty or vulnerability to be supported in being safe and independent in order for them to be more hopeful about their futures.

We therefore naturally welcome the expressed focuses on care experienced young people, and young people leaving the justice system, however we would be eager to emphasise the many other cohorts of young people who also face significant need and isolation, without the support around them they would need. This includes young carers, young people who have been subject to significant familial difficulty, or who may have been subject to Child Protection measures for significant periods of their childhoods but never taken into care. We recognise this may not be easy to remedy, but it is important that all young people who have faced adversity in their young lives are recognised and given the support they need. Without addressing this effectively, large numbers of young people will continue to fall between the cracks in services. Without this recognition we fear too many at-risk young people may not pass an assessment to be considered as housing priority status and instead end up languishing on waiting lists and even being made homeless. We would urge WG to consider how to identify all young people who need support in this area and engage with partner organisations and those with lived experience to determine how to support all young people appropriately.

We see time and again the numerous barriers and hurdles which need to be overcome by young people who are homeless or are at risk of becoming homeless. These barriers include the lack of support available to them, the disparity between any benefits or earnings they might receive compared with increased rents particularly given the cost-of-living crisis, as well as a distinct lack of appropriate (and affordable) housing. It is evident that the current limited housing stock and social housing cannot sustain the levels of need.

One of our South Wales services highlights that “We have seen, in a large urban area in Wales, in the first week of January 2024 alone, that only 2 properties are available, and even then, the available housing support benefit available to a 16/17-year-old would not cover the rent on these”.

There are also challenges for young people when considering the rate of Universal Credit for those under 25. Affordability is a significant barrier and when factoring in the considerable increases in rent for properties on the market in the past year and more, this is not affordable which then raises the risk of increasing the rate of failed tenancies for young people even further. This demonstrates the need not only for an increased supply of affordable homes in safe areas, but also increased support to promote successful, sustainable tenancies.

As Welsh Government has previously recognised, homelessness is about so much more than housing, and we would urge Welsh Government to ensure that we take a system-wide view of homelessness and the measures that can be taken to either end or prevent it, and work cross-government wherever possible.

(1) Cardiff University and Crisis (2014) 'Nations apart? Experiences of single homeless people across Great Britain'. Available at: [crisis_nations_apart_2014.pdf](#)

(2) Don't+Let+Me+Fall+Through+The+Cracks+-+Full+Report.pdf ([squarespace.com](#))

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Care-experienced young people tell us that they feel 'locked out' of private rented accommodation due to their inability to provide a guarantor to a private landlord something that a young person would usually rely on a family member or family friend to do. Most landlords demand rent upfront alongside a deposit which can be very difficult for care leavers to provide due to their low income and lack of familial financial support. These practical problems can make it very difficult for care leavers seeking to access accommodation in this sector. (3)

We would urge Welsh Government to work with local authorities, the private rented sector and with care-experienced young people to find a solution to this and ensure that, as corporate parents, Welsh Government is able to step in and help plug the gap where a guarantor is the difference between a young person taking steps towards independence and achieving their goals, and not.

There is a lack of appropriate housing stock for young people who might have spent time in supported accommodation and are now ready to move onto independent living. Ideally a young person would spend a period of time living in supported housing (such as the Barnardo's Supported Lodgings Service and Transition and Training Flats in Swansea²⁴) before being supported to transition to their own accommodation. However, a lack of suitable housing (such as one-bedroom flats) for a young person to be moved on to, means that there can often be a long delay which blocks up the system. This can cause significant disruption and hardship for care-experienced young people. For those unable to access supported lodgings because young people cannot be moved on, as well as for the young people who have spent time in supported lodgings and have worked hard to develop the skills and confidence to manage their own tenancy. We have heard numerous examples of young people who have made huge amounts of progress whilst living in supported accommodation but experience a drop in confidence when they feel as though their corporate parents do not recognise this by failing to support them with an appropriate place to live. Barnardo's has worked with young people who tell us that the emotional and mental health implications of feeling let down in this way has a significant impact on their lives moving forwards.

We would recommend that Welsh Government carry out a review into the provision of appropriate accommodation for care-experienced young people across Wales, identify the gaps in terms of capacity within appropriate supported accommodation provisions as well as options for move-on, and design an action plan to tackle this. Otherwise, we risk what is already an endemic issue from becoming even more entrenched and continuing to affect the outcomes of those young people in our care for years to come.

Through our work with young people, we have found that there is a lack of consistency within each local authority area, we would welcome strengthened legislation that can help to provide a more consistent approach across Wales going forward. It is vital to recognise that the responsibility to support homeless 16- and 17-year-olds primarily lies with social services, however there is a role for housing departments and consistent, collaborative working across teams and with third sector partners.

Young people can sometimes experience being passed back and forth between housing and social services when making a homelessness application. This seems to be caused by confusion around the duty of corporate parenting and its interpretation within the local authority. It is important that the guidance and legislation are strengthened to make clear that both are required to work together to secure suitable accommodation for a young person, removing the reliance on case law and ensuring young people are properly supported.

When considering what more can be done to strengthen the delivery of corporate parenting, we would urge the Welsh Government to consider the below;

Be much more explicit as to where the duty lies in the legislation as opposed to utilising only case law and codes of practice or guidance. Using guidance only can mean further inconsistencies to support and where young people have little to no understanding of the guidance, can mean they are unable to question practice unless they have support from a third sector advocate.

Having prevention of homelessness sit outside of statutory services for 16- and 17-year-olds possibly

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

within the third sector so that a young person always has an impartial advocate to help them navigate through the process and ensure assistance if challenge is needed to either Social Services (SS) or Housing, rather than the young person getting caught in between SS and Housing.

Ensure there is one team within social services that have responsibility for 16/17-year-olds facing homelessness so there can be some speciality around this. In addition, joint training between social services and the homelessness team would ensure there is a commonality of language particularly around thresholds, unmet need, challenging (particularly SS) that signposting a young person to housing does not 'meet' that need.

Recognition that homelessness is a need, in and of itself, and the young person doesn't have to demonstrate multiple needs in order to qualify for a service from social services.

Better use of the youth homeless pathway coordinator roles that have been set up, and are currently paid for by the youth support grant, with an explicit need for that person to be a joint Housing/Social Services resource who brings together a clear protocol within the LA for how Housing/Social Service and if appropriate a prevention service will work together.

We have found that there can be a disparity across Wales as to how the money is spent, or what department this is allocated to within local authorities. Whilst we appreciate each local authority runs slightly differently, these differences can also bring challenges for young people.

We would welcome closer scrutiny of the services being provided by LAs for over 18 care leavers and 21- to 25-year-old care leavers. In some instances, homelessness services for over 18 care leavers are often defaulted to the housing department as their responsibility and for care leavers between 21- 25 there is very little advice or assistance from social services. We understand that social services are under immense pressure however in the spirit of the corporate parenting charter it is vital that care leavers are provided with the right support to make positive choices for independent living.

We agree that the below proposals should be implemented to better support care experienced young people facing homelessness;

Amend the Housing Act 1996 to provide that care experienced people have the highest priority in housing allocation.

Amend the Housing Act 1996 to state that 'local connection' should be disregarded for care experienced people at their election.

Amend the Housing (Wales) Act 2014 to ensure that care experienced people over the age of 21 retain "priority need" status when homeless.

Amend the Housing (Wales) Act 2014 so that care experienced people facing homelessness cannot be referred to another local authority due to 'local connection' if they do not wish to be".

We welcome the proposed changes to local connection for care- experienced young people. When considering local connection, it is vital that local authorities take into account the young person's needs and experiences before, during and after entering into care. Ensuring that each young person is listened to and that there is flexibility around local connection can help prevent further trauma and support young people in making positive choices to live independently. We are extremely pleased that these changes are being considered and believe they will significantly benefit young people now and, in the future, if taken forward.

However, there also needs to be a clearer understanding of the housing needs of 16- and 17-year-olds. As well as an oversight of the competing demands local authorities have when trying to provide housing for care leavers and young people who are homeless due to family breakdown (so not having care-leavers status). In a time of unprecedented housing shortage, when local authorities are facing numerous

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

competing pressures in terms of supporting young people facing homelessness, it is important to ensure that there is appropriate support available for all young people to ensure that young people's needs are not secondary to the local authority obligation to find housing for their care leavers.

(3) Rent guarantor - FINAL.pdf (barnardos.org.uk)

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

We are concerned that the introduction of occupation contracts for 16/17-year-olds may lead to those young people seeking support from local authorities being advised to privately rent as a first step, particularly due to social housing pressures on local authorities. We appreciate the pressures on housing departments and the high volumes of individuals needing accommodation, however, young people particularly those with care experience or care leavers would benefit from additional support to be able to manage a tenancy. At its current level LHA rates may not be enough to cover a rental property for a young person and they may struggle to access private rents.

There would also need to be consideration around the ability of a young person under 18 to enter into a utility contract, including their understanding and any obligations on them. We welcome further consideration of this area as any potential issues could leave them in financially difficult position for many years.

Additionally, we fear that there are very few 16- and 17-year-olds who would be able to successfully hold a tenancy without substantial tenancy support. In order to achieve this there would have to be intensive support offered to the young person. This would need to include significant hours of support, and ensure young people are supported to the point that they are not prone to a drop off. This would be expensive to put into practice. Vitally, we would highlight how damaging a failed tenancy can be for young people, particularly if this is caused by rent arrears, or anti-social behaviour. Ensuring young people are not set up to fail must be a core consideration of this white paper.

However, there are significant numbers of young people who struggle to live within the current 'hostel' 24 hour supported accommodation models. For some of those young people, holding an occupation contract may be the right option. These young people would need even more intensive support to be a successful tenant, and this would probably need to be specialist support like Housing First.

As we have demonstrated there is no 'one size fits all' when approaching accommodation solutions for young people. We would urge there to be flexibility for young people, recognising their unique circumstances and that support, choice and understanding are key to ensuring that each young person's needs are met in the best way for them. We would welcome further discussion around this.

In particular, care leavers and care experienced young people may need additional support to transition to adulthood and we would have some concerns when considering the potential removal of priority need. There is the potential for unintended consequences whereby at-risk young people may fall through the cracks. How would this be mitigated? We would welcome further detail on how this would work in practice.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 37

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

Broadly speaking, the proposals within the White Paper should lead to increased prevention and relief of homelessness.

Under the current housing market pressures, 56 days has become insufficient time for an individual or family to source their own accommodation or for a local authority to secure housing alternatives. With this in mind, the proposal to redefine 'threatened with homelessness' as six months is more than reasonable. This will also align with no-fault eviction timelines introduced with the Renting Homes Act 2016.

However, newly granted refugees in Wales do not even have 56 days to begin with. As per Home Office regulations, the move on period from asylum accommodation and support for newly granted refugees is only 28 days. If 56 days is not enough time, 28 days is condemning them to homelessness. We acknowledge that the Welsh Government has no oversight or influence over Home Office and UK Government policy regarding asylum support or move on. But within the Nation of Sanctuary aspirations, more could and should be done.

The proposed Personal Housing Plans (PHP) should introduce a degree of choice into housing allocation. There are several reasons why newly granted refugees prefer to live close to their communities, places of worship, and shops selling Halal food and familiar products. Having fled trauma to reach Wales, and having been forced to abandon what is close to them, these community connections are vital to their well-being. Wales' unreliable and underfunded public transport networks mean people living far from these community hubs are isolated and denied their individual well-being goals, as set by the Well-being of Future Generations Act.

When housing is allocated in areas lacking diversity, it can be a source of much frustration and anxiety. Our service users express apprehension at being one of the few people from a diverse ethnic background in an area. Given the rise in anti-refugee rhetoric over the last year, as seen with Stradey Park, and historic precedents, this is understandable.

PHPs and the other proposals outlined toward the end of Chapter 1 should also improve communication. Internal data gathered between October 2022 and March 2023 found that over 80% of service users accessing our Cardiff office raised issues regarding the local authority's Housing Options Team. The team was often considered to be unsupportive, and it was felt that they do not communicate well. The same data found that just under 10% of service users' homelessness cases were closed without any email or call notification from a Housing Options Team.

Proposals that aim for clearer communication must take translation and interpretation into consideration. Recent legislation has simplified Welsh housing, but it is still a complex environment. Newly granted refugees going through the system do not always speak fluent English and will almost certainly not be used to the Welsh housing system. Resources must be allocated for proper translation and interpretation services.

Ultimately, the majority of the proposals within the White Paper will fail unless more housing options are brought onto the market. This should be in the form of mass social housing building and by the introduction of more affordable properties into the private rented sector. Bringing choice and reducing the obstacles people encounter in accessing housing are positives the White Paper aims to introduce. This

Q2. What are your reasons for this?

will, however, lead to more local authority responsibility to house people. Without increasing options, there is a risk that local authorities will fail in their obligations. The wider Welsh housing context is also seeing the transition to a rapid rehousing model. A council housing worker recently told us that there was no housing element to rapid rehousing, let alone rapid. The target of 20,000 affordable housing units set for the end of the Senedd term in 2026 seems unlikely to be met. We simply cannot put an end to homelessness without the dwellings to house people in.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

The right to a good home, as set by the Back the Bill coalition, should be the cornerstone of any legislative change to end homelessness in Wales. The evidence of its long-term impact speaks for itself. The positive outcomes are far-reaching, and in other jurisdictions such as Canada, Finland, or New Zealand, have been proven to only save money on housing, but also reduce healthcare and criminal justice system whilst resulting in better long-term education and employment outcomes. If we are serious about ending homelessness for good in Wales, we must create a legislative mechanism that enshrines housing as a human right for all in Wales.

The Welsh Government's Nation of Sanctuary Plan seeks "to prevent the most harmful problems experienced by refugees and asylum seekers in Wales". The Welsh Anti-Racist Plan calls for "identifying and getting rid of policies, systems, structures and processes that produce radically different outcomes for ethnic minority groups".

We acknowledge that the 28-day move on period is not set by the Welsh Government, but the Senedd can legislate what happens after that period. The fact that newly granted refugees will not be protected by the proposed 6-month protection is unfair, unjust, and discriminatory. It also goes against the ambitions of the Nation of Sanctuary Plan and the Anti-racist Wales Plan. To this end, the Welsh Government must consider alternatives within its legislative competence.

Participants in Tai Pawb's The experiences of homelessness of people with protected characteristics in Wales highlighted the 28-day notice as the main reason for them becoming homeless. If we want equality, newly granted refugees must be provided with interim bridging accommodation to prevent homelessness in the first place. Future legislation should include a duty on local authorities to provide 28- or 56-day interim bridging accommodation. Ideally, the interim bridging accommodation should be enough to align with the proposed 6 months and the provision of interim bridging accommodation to those newly granted refugees who have been unable to secure accommodation.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No. Local connection is a barrier for people to access support.

We are dismayed that the only group suggested by the Expert Review Panel to be excluded from the 'special circumstances' category in the White Paper are "refugees and other former asylum seekers who have been granted leave to remain in the country"

We do not understand the reasons for this. Newly granted refugees already compete at a disadvantage in accessing increasingly limited housing options. If Wales is to truly be a Nation of Sanctuary, such oversights should be eradicated.

When housed by the Home Office, asylum seekers have no say whatsoever in where they are placed. The Home Office can move them, with little consideration as to the impact on their well-being. Recently, one of our volunteers, who was still in the asylum system, was required to leave Cardiff and move to Birmingham. In Cardiff, they had been a volunteer with different organisations and had built a successful life for themselves. In Birmingham, a city they did not know, they had to start again from scratch.

When an asylum seeker is eventually granted refugee status, they will have a local connection to that area of asylum dispersal. With the Home Office's current policy, all local authorities in Wales are taking in asylum seekers. For cultural, community, education, or employment reasons, newly granted refugees may not want to stay in that local authority. There may also be cases where racist attitudes have made them feel unwelcome. They may want to settle in a larger city with more diversity, but the local connection rules mean that they would be unable to get support if they were to become homeless afterwards.

It is a similar situation with Ukrainian refugees who have arrived since March 2022.

In the initial response to the Ukraine crisis and the establishment of the Homes for Ukraine scheme, the risk of host relationship breakdown was understood, and intervention measures were put in place in order to prevent homelessness amongst Ukrainians. Emergency accommodation provision was put in place via Airbnb, administered by Housing Justice Cymru. However, this provision was underutilised due to the existence of an extensive network of Welsh Government initial accommodation facilities, which allowed those needing rehousing to be recycled back into the initial accommodation system and find longer-term accommodation with hosts, in social housing, or the PRS. With the closure of the emergency accommodation provision and the initial accommodation facilities, Ukrainians are again at high risk of homelessness.

Many Ukrainians in Wales rely on connections made during their time in initial accommodation. Those ad hoc communities are now being broken up. When a Ukrainian loses access to secure housing, they often rely on their limited network to avoid street homelessness, and can end up sofa-surfing to avoid rough sleeping. This often places them in local authorities where they have no established local connection. Sometimes, these ad hoc arrangements go on for extended periods, and local connection to their previous area is lost. Some Ukrainians left their initial places of residence to take jobs with onsite accommodation and as a result never established or maintained a local connection. Some have had to return to Ukraine for extended periods of time and have lost local connection upon their return to the UK. All these circumstances contribute to difficulties when people present to local housing options teams to access support.

Case Study

ZK entered the UK under the WG Super Sponsor Scheme into initial accommodation in Rhondda Cynon Taff, after which she lived with a host. She took a job on a poultry farm in Humberside, with accommodation provided onsite. Due to a family crisis, she had to return to Ukraine. With no accommodation upon her return to the UK, she turned to RCT Local Authority for assistance, which she did not receive. This forced her to stay temporarily with friends in the Swansea area.

After several weeks, she tried to access support from Swansea City Council, but having no established relationship with that council, and no solid local connection, support was denied. ZK approached us and

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

our staff entered dialogue with the Welsh Government, third-sector partners, including Crisis, Housing Justice Cymru, Shelter Cymru, and Welsh local authorities.

As ZK was successful in securing employment in Swansea at one of the city's more prestigious hotels, the caseworker also focused on persuading Swansea Housing Options to take on the case based on ZK meeting the legal conditions. To increase the potential housing options, the caseworker liaised with LA contacts across south-west Wales to seek out a potential host. The following weeks allowed the caseworker to demonstrate definite local ties in the form of friends and employment, something that was not replicated with any other LA. This resulted in ZK moving into a flat with the support of the LA housing options team, approximately two on a half months after our initial contact.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

We will only end homelessness in Wales if there is complete cooperation between different bodies.

Ideally, future legislation should be strengthened so that public bodies are duty-bound not to discharge anybody into homelessness.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

The proposals broadly work for most people who may need homelessness support. Even so, the absence of education among the proposed relevant bodies with duties to identify, refer, and co-operate is concerning for vulnerable children and youth. Again, if we want this paper to have meaning, and are serious about ending homelessness for good, we need to take radical steps.

We understand that the Welsh Government cannot place duties on bodies under the control of the UK Government. However, to prevent newly granted refugees from becoming homeless, it is crucial that the Home Office assume these duties.

Comparing the data provided by the Home Office regarding newly granted refugees with our internal data, we know some newly granted refugees fall through the cracks. Some move out of Wales or into accommodation, but others simply disappear into homelessness. Inadequate information provided to them while waiting for their asylum decision means they are often unaware of what support they are

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

entitled to.

We welcome the Welsh Government's claim that they have shared their intentions with the UK Government to place these duties on certain bodies. We would like clarity on the progress of these conversations with the UK Government and the mitigation plans in place if the UK Government fails to cooperate.

Alternatively, the Welsh Government should explore collaboration with the Home Office's contracted asylum housing providers. In Wales, this is Clearsprings Ready Homes. They do not receive advance notification of when someone will be granted a positive asylum decision, but they do have the experience of directly working with them before any decision. The information given to asylum seekers regarding their housing rights and options while they wait for their decision is inadequate. Targeted engagement at this stage would allow for preventative work.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

We are deeply disappointed that newly granted refugees have not been considered as one of the groups disproportionately impacted by homelessness. Once granted refugee status by the Home Office, the 28-day move on period starts. On its completion, Home Office accommodation and support come to an end.

In this 28-day period, newly granted refugees have to open a bank account, try to set up benefit payments, find a job, secure accommodation, and more. Delays are frequent due to their Biometric Residence Permits (BRP) not arriving on time. They usually cannot open a bank account or apply for benefits without a valid BRP card.

In the current housing crisis, 28 days is not enough time to secure any type of secure, long-term accommodation, let alone one that is suitable. Tai Pawb's Refugee Housing and Support Feasibility Study pointed to the "significant barriers experienced by refugees once they are granted leave to remain in finding appropriate accommodation and support that enables them to move on with their lives, integrate into society and avoid destitution".

We recognise that homelessness is increasing across all sectors of society and that the Welsh Government's budgets are stretched. But newly granted refugees are particularly at risk for four key reasons:

- having lived on Home Office support of £45 per week, most have no savings to pay for deposits, several months' rent in advance, or to enter 'bidding wars' for private rents
- most landlords demand a UK-based guarantor, which newly granted refugees rarely have
- the 28-day move on period provides inadequate time to access overwhelmed homelessness prevention services or bond schemes
- many sanctuary seekers are still developing their English language skills by the time they get refugee status, making it difficult and confusing for them to access and understand non-specialist support

Participants in Tai Pawb's The experiences of homelessness of people with protected characteristics in Wales highlighted the 28-day notice as the main reason for them becoming homeless. Similarly, there are other substantial barriers to accessing education, employment, or healthcare.

As part of their bid to cut the asylum backlog, the number of positive asylum decisions granted by the Home Office trebled in the second half of 2023. In April 2023, we saw 35 newly granted refugees a month across our four offices. Those figures for the last months of 2023 all exceeded 110. This has not been an issue exclusive to Wales. Local authorities across the UK have complained that the Home Office had not put adequate measures in place for them to help with the move on transition for newly granted refugees. The volume is overwhelming.

The British Red Cross estimates that without further measures, over 50,000 newly granted refugees were likely to be homeless by the end of 2023. BRC data also found a 140% increase in destitution for people with refugee status between 1 August – 15 September 2023.

The Big Issue reported that an average of 33 refugees a month have been evicted into homelessness in Cardiff between August and November 2023, up from an average of 10 in previous months.

The widening of dispersal will also have an impact on newly granted refugees across Wales. In the absence of specialised or adequate support services, refugees risk slipping through the cracks, especially during the 28-day move on period. Without knowing what to do and lacking financial resources, many newly granted refugees risk becoming destitute and homeless.

The Welsh Government's Nation of Sanctuary Plan seeks "to prevent the most harmful problems experienced by refugees and asylum seekers in Wales". Preventing homelessness through targeted support would reduce many of these harmful experiences. It would also lead to quicker integration into

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

local communities and long-term independence from support services.

The types of interventions that could aid in preventing homelessness for newly granted refugees are outlined in the response to question 3.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

We view positively that people with No Recourse to Public Funds (NRPF) are included among the targeted groups. We understand that the Welsh Government does not set NRPF status so recommendations and options for support may be limited. The NRPF condition means that local authorities have no duty to provide any kind of support through traditional housing and homelessness routes, as set out by the Housing (Wales) Act 2014.

Nevertheless, more work can be done. It is disappointing that, unlike the other targeted six groups, there are no legislative proposals for NRPF.

Without the legal right to work, refused asylum seekers do not have the financial resources to access the private rented sector or to buy property. Nor can they open a bank account or apply for benefits that would cover housing costs. Even if they do have financial resources, landlords may be reluctant to rent to them, often citing insurance concerns.

For those who have had their asylum claim turned down, hosting schemes could be a solution, but they are heavily oversubscribed. The situation is aggravated by the fall in the number of hosts putting themselves forward due to Britain's ongoing cost of living crisis, as has been widely reported through the Homes for Ukraine scheme.

Unsuccessful asylum claimants cannot always return to their country of origin right away. In the interim, they can end up in limbo, vulnerable, and living on the streets in abject poverty. This has a severe impact on their physical and mental health. Many have placed themselves in dangerous situations just to survive.

The Social Services and Well-being (Wales) Act 2014 provides an opportunity to support people with an NRPF status. Under Section 19 (s.19) of the Act, local authorities have "a duty to assess" when it appears an adult may require care and support. These assessments include offering protection from abuse and neglect. The condition of NRPF does not prevent local authorities from providing accommodation to especially vulnerable people funded on a discretionary basis. Under the Act, local authorities can provide support and accommodation directly, arrange for its provision by a third party, or make payments to adults allowing them to secure support and accommodation themselves. Local authorities can also carry out assessments to determine whether an individual's situation is solely due to destitution, or whether there are other relevant mitigating factors and other needs. Future legislation to end homelessness should place legal duties on local authorities to fulfil the Social Services and Well-being Act with regard to people with NRPF.

The proposals for people with NRPF in the White Paper on Ending Homelessness in Wales are encouraging, especially in terms of establishing a specialist officer to assist local authorities with NRPF cases. The fact that local authorities struggle so much to support people with NRPF suggests this is very much overdue. We would like this role and its extent to be clarified. With the changes brought forward by the Illegal Migration Act more people will fall within the NRPF category as their asylum claims will be classified as inadmissible. The widening of dispersal will mean that all local authorities in Wales may be dealing with people categorised in this way. A single specialist officer to advise and assist local authorities in managing cases of people with NRPF may prove to be insufficient.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

The Welsh Government has already developed its own specific NRPF guidance and has encouraged local authorities to develop their own referral pathways. Unfortunately, this has not always been followed through. It is imperative that local authorities acquire a better understanding of their duty to support especially vulnerable people with NRPF. Local authorities must establish tailored NRPF pathways, and they should work with the Welsh Refugee Council, people with lived experience expertise, and other third sector providers to develop them. Future legislation to end homelessness should make this a requirement for local authorities, whereas now it is only a suggestion.

Case Study

Nancy recently accessed our services. Originally from Central Africa, she applied for asylum in the UK in 2020 and has lived in Wales ever since. Her asylum application was refused in 2021, but she had stayed in Home Office-provided accommodation as part of the 'everybody in' policy. Nancy is HIV+, needs a walking stick, and suffers from anxiety and depression. She is frail, weighing only around 40 kg, and looks much older than her 57 years.

Recently, Nancy spent several weeks in hospital. When she was discharged, she was informed that she had been evicted from her Home Office accommodation.

With no legal representation and nowhere else to go, Nancy was forced to sleep rough. One night, someone stole all her belongings, including important immigration documents and her Aspen Card. This is a credit card the Home Office provides to sanctuary seekers, which is topped up weekly with £47.39. During her time in hospital, Nancy had been able to build up some savings on the card, which she could have used to buy food. Our request to the Home Office that they provide a new one was refused on the grounds that Nancy did not have an address where it could be sent. Nancy seemed wary of the police investigating the theft.

When Nancy accessed our services, she was suffering from hypothermia and would not speak. None of the third sector partners we contacted in an effort to find her accommodation had capacity.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

We broadly agree with the proposals to increase the suitability of accommodation. We are concerned that accommodation with Category 1 Hazards was deemed suitable.

The following proposals are especially worthwhile:

- We understand shared sleeping space is rarely used but we propose to make it clear in legislation, shared sleeping space is never permitted, regardless of the temporary or emergency nature of accommodation.
- We propose to introduce a requirement that these personal circumstances must be given consideration in assessing suitability of accommodation, even if it is not possible at the time of the assessment to meet all of those needs through accommodation placement.
- We propose accommodation cannot be deemed suitable unless it is located within reasonable travelling distance of existing or new educational facilities, employment, caring responsibilities and medical facilities, unless the applicant wishes to move beyond a reasonable travelling distance from those facilities.

A case where a father and his 15-year-old daughter were asked to share a sleeping space in a temporary accommodation hotel was brought up with the responsible local authority. The response was that this was an acceptable setting given the current housing demand. We are gratified that situations such as this will not be repeated but are appalled that it was allowed in the first place.

Personal circumstances will play an important part in broader efforts to bring cultural adequacy to housing and psychologically informed environments. For instance, Muslim women have complained that being asked to share living spaces with men or women from other religions can lead to situations that go against their religion. This proposal must consider these questions

“Reasonable travelling distance” needs to be defined. The problem is highlighted by a recent case. A family’s move between temporary accommodation settings resulted in the 14-year-old child’s school being three miles away. To continue attending, due to poor bus routes, the child has to cycle there and back through busy Cardiff traffic. For several months of the year, the journey is in the dark. Because the family did not have financial resources, the bike, helmet, and reflective gear had to be sourced via the Welsh Refugee Council and other charities. Had these charities not been able to step in, the child may have been unable to continue attending school. For some families, three miles might be considered a “reasonable travelling distance”, but for this family it certainly was not. We have plenty of other examples of moves to temporary accommodation or a permanent long-term home affecting school attendance.

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Sanctuary-seeking children have been deeply affected by their journey to Wales. In the process, they have already missed out on valuable school time. Once in Wales, they have to adapt to a new education system in a language that is often not their own. Any additional disruption caused by school moves will affect their educational and well-being outcomes and put their future in jeopardy.

The impact on education must always be considered within “reasonable travelling distance”. Ideally, unless the family consents to it, they should not be moved to a new accommodation setting if that will force their child to change schools or take on an unsafe school commute. Exceptions can be considered during the summer school holidays, when there is time to plan and carry out a move.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Response 38

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

We agree that legislation should be aligned and would welcome a six months prevention duty. With sufficient resources and aligning prevention measures to 6 months, will allow for more meaningful work and could lead to more positive outcomes. However, given current pressures, limited move on options and the housing sector (particularly frontline) is at the brink of collapse given the housing crisis, cost of living and other external factors this could prove extremely difficult to achieve even within a 6 months timeframe.

In this current climate it contradicts the rapid rehousing approach as caseloads are bigger and less short-term solutions are available, given the limited availability of social housing, low LHA rates, PRS remaining unaffordable to most and long lead in times to bring any developments forward. In principle rapid rehousing makes sense and we would love to be able to deliver, however this should be a 10 – 15 year plan and not expected to deliver within 5 years.

Prevention as a tool in current climate is not achievable. The figures provided on WHO 12 data returns show that prevention isn't effective enough and that most people are being forced into homeless through no fault evictions. There are no preventative options due to clients being frozen out of the private rental market and there are limited social housing spaces to accommodate this aspect of work. Front line workers are finding more and more households relying on a homeless duty in order to access social housing. In order for rapid rehousing and prevention to work effectively there needs to be the resources and infrastructure in place to allow this to happen, which currently there isn't.

With no increase in the HSG budget for 24-25, there are not only no additional provisions for an increase in floating support and HSG funded early intervention works to take place alongside this legislative change, there are actually less HSG funded resources to intervene during an extended 6 month prevention period. Due to the recruitment difficulties within the sector combined with a cost of living crisis and increases in the National Living Wage, we have had to re-focus the HSG budget and reduce the amount of support which is commissioned in order to increase contract values to a level at which they are viable for support providers.

With extended prevention duty there will be a requirement for possible additional HSG resources to aid HS teams in meeting their stat duty, however HSG budgets are limited with no uplift based on current demand. HS officers based on current caseloads will be unable to do the extensive work required in order to prevent homelessness, and significant investment in staffing resources either through LA budgets or HSG will need to be considered.

PHP's being a requirement for each homelessness case should be done, this provides the much need grounds to evidence that the appropriate advice has been provided and reasonable steps agreed by both officer and client. Whilst this would create additional case management for staff, prevention is less costly than the use of TA, also its about how we utilise the housing prevention duty to ensure people have been advised and understand their responsibilities in seeking accommodation taking reasonable steps themselves not just solely relying on the local authority to provide and "Do to them". PHP should be based on individual needs following the homelessness assessment that captures the needs of the household/individual, the support on offer tailored to their level of skills or ability, health or financial circumstances. The increase in time to 6 months for prevention would allow for PHP's to be more meaningful including providing the time for officers to carry out their agreed actions as well as clients being able to demonstrate adhering to the reasonable steps. The PHP should also be a living, breathing document used to track the journey and history of an individual, not only created as a one off due to risk of homelessness at that time, captures representing in the future, the resettlement hand off to other public/third sector (HSG funded services) etc. 8 weekly reviews will be too much with current caseloads, if

Q2. What are your reasons for this?

move on and infrastructure properly in place to achieve Rapid rehousing etc good practice should be consistent contact with clients for updates on progress a review of the PHP could be completed on any notifications of a change of circs.

PHP – Should only be requested to be reviewed if disagreement in regards to ending a duty due to not taking reasonable steps as initially agreed on or if felt officer not adhering to their reasonable steps as initially agreed on. Should be subject to regular case review by officers. Lack of current housing stock doesn't allow the client to exercise true choice of where they live and reasonable steps of accepting properties should be realistic of local demand and geography, or a person could be keeping themselves from being housed appropriately not allowing the prevention of homelessness.

Right to review interim accommodation and accommodation provided under the main duty. – Difficult to manage this while needing to use unsuitable TA such as B&B currently to place homelessness. While individuals are currently having lengthy stays in TA there will be points where needs will change however, until there is an increase in accommodation options to truly implement Rapid rehousing this could place significant pressure. Also would this not be subject to a reasonable step of the PHP that the client is to inform of any changes in needs/circumstances to ensure their housing application is up to date with their housing needs.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

We would welcome more legislation changes or new legislation to strengthen the wider public sector responsibility in preventing and relieving homelessness as housing is everyone's issue. As the duty to cooperate is vague and provides limited reassurance for the housing sector in terms of compliance given its lack of jurisdiction. This also reflects the need to further update the wider public service responsibility within the HSC&WB Act in line with the aforementioned. Housing legislative training and ongoing training should be mandatory for all public services to understand and enforce their duties and responsibilities to make real change and would also welcome as an aside more change to school curriculum to include basic housing and welfare knowledge.

Other public sector services not being able to discharge into homelessness wherever possible, contact with the housing department sooner not an afterthought and expectation to rehouse within days, should be in a person's discharge plan as early as possible.

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No, agree for armed forces personnel, care leavers and DV victims as stated currently, some of the groups suggested for inclusion is potentially open to abuse. Lack clear consistency of utilisation of the current local connection criteria across Wales, have seen this can sometimes be used as a gatekeeping tool. And would suggest the Local Connection tests be at the initial stage (Duty to assess) to prevent unnecessary and abortive work and assessment for LAs which the applicant won't reside in. Prison leaver's needs to maintain some local connection and move to another area arrangements. Safety concerns around issues such as county lines. Merthyr already has a disproportionate amount of prison leavers in Merthyr (3rd in Wales)
Needs to have more strict evidence and checks for DV – increase guidelines on this.
Should also consider the resource of other public services required to support the “special circumstances” why people are choosing to move to an area. Especially if requesting that other public services have a responsibility to prevent homelessness. The human impact of vulnerable adults where there can be a loss of contact with services or a lack of appropriate hand over to other areas services. Example Disabled applicants who require access to particular support, increase in an area where there is a certain medical provision but social services are unable to/ decline to support and the lack of available appropriate adapted properties to meet people's needs, lack of DFG available to adapt homes. LC provides protection needed for vulnerable adults making “off the cuff” decisions to move to an area risking isolation, lack of support from services friends of family etc. If there is a genuine need to move to another area this can be arranged and planned through LA's.

Removal of all 3 tests is going to create an open route into jumping social housing registers with rapid rehousing. Instead of having to evidence priority need for the register and waiting on the list the potential of people leaving properties (if no intentionality), potentially go to other areas go into TA placements very short term (when we can truly abide to the rapid rehousing model) and get offered a property.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Impact on already struggling LA budgets, resource to deliver the new legislation cannot be underestimated in terms of both staffing resource and ongoing support to retain those skills and knowledge, revenue funding to support those with needs to sustain and develop housing related skills, interim finance towards TA costs, more capital investment to create more homes at pace and scale with realistic expectations of when we can expect new homes to be available. Increase on Revenue funding based on demand and not just the size of a local authority.
Responsibility on all public services, further self-reliance on social housing and manipulation of the system. We are at risk of creating a Self-fulfilling prophecy on the younger generations. We are already seeing families coming through the system, then their children and grandchildren etc. We feel that this is reinforcing that social housing and reliance on homeless services will be seen as the norm. More work needs to be done around education and breaking cycles of homelessness.
Nimbyism – can further exacerbate poor relations and stigma toward those experiencing homelessness/sector.
Addition of reviewing funding available for other areas that impact housing/housing stock/need such as DFG, lack of funding, increases wait lists to access the grant, places a pressure on social housing to provide suitable properties due to people needing to consider moving (potentially from privately owned) instead. Aging population seeing an increase in social housing stock being adapted over time and decreasing general housing stock also.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

Duty to cooperate has no teeth, what would be the consequences for non-compliance, all public services need to be jointly accountable for this to work which would need to be legislated carefully and specifically in terms of roles and responsibilities, This still suggests this is a housing issue, when more often the wider issues would be an overriding factor in someone being able to gain and retain accommodation which seems a direct contradiction of the RRT.

Who are going to be the lead agency for the Multi agency working? If a service can't provide the needed resource what are the implications of a service saying no.

We often see particularly with health refusing to referrals for those with MH issues due to substance use/alcohol use. Even though there are services available for this to work together to address, they have over reliance on support service (such as HSG funded support) who are not the specialism to support the person appropriately. This also places stress on those staff for low pay, and also places stress further on a lacking HSG budget. Ultimately results in breakdowns in support and placements or working towards preventing homelessness or finding a property.

It has been often seen where health do not contact housing until they are discharging a person from hospital within weeks. Often result in threatening discharge into homelessness instead of forward planning and multi-agency working to plan together. Health can often work in silos causing the disjointed communication of who, where to contact to work with a service.

An all Wales system would support the multi-agency, across all LA's (WCCIS as an example). This would aid the PHP and recording the journey of a person and their housing needs.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

We would add Probation and YOS, other community funded services through public funds, Shelter, to do rather than tell others how things should be done.

Recent new criminal justice bill should also be taken into consideration also with regard to nuisance rough sleeping and begging and the implications or push from police that may happen as result of the bill becoming law, and the impact if police choose to not exercise this as a last resort, the impact that will have on housing services having further push that it is a housing only issue to sort. But also the implications on any ongoing support work going on with the individual looking to work with them progressively towards suitable accommodation I they have not been able to sustain a placement or those who are entrenched homelessness making progressive steps with support. Furthermore the ability that RSL's will be able to have closure order for up to 48 hours for ASB as part of this, will be done with support of police and this will cause a conflict with the aims of this white paper.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Still suggests a significant overreliance on housing and given lack of presence and involvement by health (given their pressures) – all public services at crisis point and therefore makes it difficult to see how the wider joint working would work in practise.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Buy in for all public services would be difficult given conflicting priorities and outcomes, already services are under pressure causing more silo working and lack of ownership, with Housing often suggested as the route to success given other service pressures (i.e. Foster Care pressure). There should be clarity regarding with what service the priority/lead service for each case decided on the main ongoing needs of the person/household, eg: lots of care needs, social services should remain involved and not just state there are housing needs and if placed into a temporary placement have no further involvement. Or health no longer being involved with a client with MH because they have temporary placement. There should be an ongoing agreed care plan of sorts with all relevant service involved also.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

As in Q11, multi-agency working will improve outcomes subject to joint accountability, ownership, who would lead given pressures across public services? Etc
Will improve the likely possibility of a person succeeding in a placement or tenancy if they have the required services to support them. Again not solely rely on tenancy support services where there are multiple complex needs there is a requirement for relevant specialised services to have a co-responsibility.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

As in No 7

Also client engagement need to be thought about and their duty to cooperate. Other wise the revolving door system will still be in effect and repeat cycles of homeless on certain client groups.

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Prison Leavers need to be reviewed as the first 30 days of release can be critical to avoid being recalled to prison following breakdown of comms/some processes in place which aren't deliverable and more proactive, planned approaches needed. Phys Dis - can cause issues, under 50 clients for those with physical disabilities seem to have fewer options as opposed to over 50s.... perception challenges with shorter term measures....culture of manipulating pathway to access social housing would be exacerbated....

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Repetitive question – answered.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

Suffolk judgement forgotten? Housing left holding the baby, with lack of wider support and partnership working, joint working very limited, aftercare often low to non-existent, conflicting avenues due to Corporate parenting duty vs homelessness legislation and setting clear and realistic expectations rather than making it a housing issue.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

If contracts were provided to 16/17-year-olds, we must have clear training, pathway and support to give clear outcomes to ensure as quite often at this age, many may not understand the full liability and potential impact on their lives over the longer term.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Answered earlier.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Need to look at current reality, lack of homes, increased pressures, and limited funding, whilst at crisis point, we need more flexibility than further rules, we all have shared aspirations going forward but realistic transition times need to be considered rather than putting the sector under more pressure. A wider WG Policy review and consensus on how we can deliver additional units flexibly given existing pressures and constraints facing LAs.

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Should be based on need not want, given current picture, realistic expectations are required to set people up for success, LAs will always work to meet peoples needs and wants but more often than not, given the pressures there are no homes available in most areas and few in others....

Regarding the Cat 1 Hazards always being unsuitable and proposing this includes the RHA FFHH. How do you expect to manage this? Environmental health teams do not assess FFHH it is decided by a court if it is deemed a property is not FFHH under the RHA, would there be an expectation for housing teams before assisting to secure a PRS that we check the 29 matters and circumstances listed in the RHA before supporting to secure or discharging a duty or assessing that someone would be deemed homeless under this? This would be an unreasonable expectation on housing teams.

Building choice into the system – not currently possible and unrealistic. Is this not contradictory to the removal of priority needs also? “person-centred system which is better able to take account of individual needs and how meeting or not meeting these needs might impact a person’s health and wellbeing” so would still be expected to consider a person’s priority needs??

Under 25’s not being placed in B&B, shared accommodation not being permitted – again resource being the key issue to truly be able to achieve this, lack of move on from suitable supported placements will cause the need to use B&B etc to not permit the use for any timescale is unrealistic, a place to go is better than no place to go.

Same for 16-17 years olds – although more realistic to achieve as this should be a smaller number of people, however again somewhere is better than nowhere but should be very short term.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

Agree, as the current legislation is more rigid, as we can accommodate in suitable alternative accommodation would meet the needs.

Agree in principle to the proposed changes to allocations including the deliberate manipulation test. However, if things such as intentionality and priority need tests are removed from homelessness would this not be a replacement for intentionality as usual practice is to place a at risk of homelessness or homeless person on the housing register for allocation of property through social housing as well as advising to seek PRS. You’re shifting where the tests are made rather than removing. You could have a homelessness duty (applicant walks away from a suitable property- no intentionality) but then deemed ineligible to have a priority on the housing register because they are using the homelessness route to gain social housing, then placed in TA placement at a high cost to the local authority with no quick move on, going against Rapid rehousing model. There needs to be greater emphasis that homelessness will not solely rely on social housing registers.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

Agree with the proposal to increase the range of housing options through which the main housing duty can come to an end. However, where a person refuses suitable accommodation the duty to remain, there are no implications for someone to sit and wait in TA for as long as they want waiting for the single property in a single area they really want, goes against Rapid rehousing model, given this will that also mean their priority need on the housing register will be reduced as being a way of manipulation??

You propose that LA’s contact the applicant in 6 months after acceptance of an offer to see if continues to be suitable, this is unrealistic given case load and it will encourage a loss of self-responsibility and independence and an additional over reliance on the local authority. Covid enhanced this expectation and

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

the Audit Wales report talks about the impact covid has had where there is an over reliance on local authorities and services to do for you rather than people being independent and making positive steps for themselves, the audit report encourages Loal authorities to promote and encourage independence and empower people to do for themselves where they can to bring back resilience and reduce the burden on services due to increased demand that would not have normally been there as people would have done for themselves. If people are aware of how to access support and where to find it then they can come and seek it where needed, end duty letters can communicate this, as well as the fact everyone knows where and how to contact their local authority for information or advice.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

The staff resource required for all the additional contact you're expecting even after people are suitably housed will be significant, on HSG services, housing services etc.

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

Need public service legislation around housing rather than Housing legislation which often exacerbates the 'pass the buck' scenario
A one system for all LA's would be a better and more efficient way of capturing the true data of homelessness all recording and capturing the same data to better form the true picture of housing need and homelessness.

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

Need more time to work through – need to consider wider resource, staff, finance (revenue and capital), ...public service wider funding to help wider needs (cohesion, CS/AS/Housing, Health, etc). More work needs to be done by Welsh Government around cost implications as we fear this will be bigger than anticipated and LA's should not have to foot the bill out of already over stretched budgets.

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

More work needs to be done by Welsh Government around cost implications as we fear this will be bigger than anticipated and LA's should not have to foot the bill out of already over stretched budgets.

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

We as a Welsh LA are fully committed to the Welsh Language agenda and will adapt our processes/ procedures etc where necessary to comply with legislation.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

More work needs to be done by Welsh Government around cost implications as we fear this will be bigger than anticipated and LA's should not have to foot the bill out of already over stretched budgets.

Response 39

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

It is recognised that the scope of the proposals is on policy and legislative reform of the “homelessness system” [sic]. However, without a parallel approach to addressing the wider factors that drive homelessness in Wales the duty is simply directed at mitigating increasing need. For example: economic development, spatial planning, housing policy, welfare administration, education and employment all play a role in determining housing supply and the allocation of that supply. Additionally, the cost of rent, energy and food as well as the geographical availability of housing and access to transport are all related determinants of health and wellbeing.

It is felt that the proposals will only partly address these issues. They do not address the need for health services to assist in managing health related issues that can impact on homelessness / repeated homelessness such as mental illness, autistic spectrum disorders, complex trauma etc.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Whilst proposed “wider duties on the Welsh public service to prevent homelessness” is welcomed, the scope of this duty should be not only on identification and referral of individuals at risk, but also mandating the engagement of wider civic systems that influence the determinants of homelessness at a local and national level in the mission to “end homelessness”.

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Priority test comments: Whilst the impact of proposal would be mostly on local authorities, any changes will require consideration for training/ guidance to be extended to health services given that consideration of priority test is part of our complex discharge planning arrangements.

Intentionality test comments: Evidence from front line colleagues outlines the need to take a more holistic view of the reasons for homelessness and the complexity of individuals at risk of homelessness, including people who are experiencing domestic abuse and/or sexual violence, care experienced young people, people with complex health needs and disabilities, people with substance misuse problems, people with mental health problems, people leaving the armed services, and those leaving prison.

As noted in the consultation paper, the “cost of living crisis” – increasing numbers in and extent of poverty - and inflation are increasing barriers to secure housing and risk of homelessness for a growing population of people. The proposal to reduce “reliance on so-called poor behaviour and rent arrears to exclude applicants” is supported. It would be very helpful for the White Paper to maximise any other opportunities to leverage change in administrative and financial systems that create insecurity of tenure within the social and private rental housing market and/or increase the risk of homelessness. Rebalancing rights in favour of the tenant and defining rental residential property as a public good rather than an investment or commercial asset might assist.

Local Connection Test comments: No - The concept of ‘local connection’ is outmoded. The impact of the policy intent of sharing responsibilities across local authorities comes at the expense of meeting the needs of the homeless. However, any change will impact local authorities unequally – with more impact likely being felt in larger urban areas. There are many factors that lead to a disruption of a connection with place and lead to individuals seeking refuge in another location. The ‘habitual residence test’, used in the health sector is materially different from a ‘local connection test’ because it accommodates an intent to settle in a particular location rather than relying on historical and it accommodates circumstances where an individual or family are seeking to relocate for justifiable reasons.

There are many examples of engagement with public services and processes which lead to a disruption in local connections (eg time spent in the criminal justice system, in residential mental health facilities, in fleeing domestic violence) where severing a local connection is of benefit. Additionally, however, the removal of a local connection test may allow for better use of housing assets across local authority boundaries.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

It would be helpful for any unintended consequences from proposed policy changes such as increased length of stay as an inpatient and any likely impact on other health services to be reviewed as part of the consultation.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Please give your reasons:

As noted previously, whilst the proposed “wider duties on the Welsh public service to prevent homelessness” is welcomed, the scope of this duty could and should be not only on identification and referral of individuals at risk, but also mandating effective cross-cutting action in relation to housing supply, affordability and security of tenure at a local and national level in support of the mission to “end homelessness”. Actions based on mitigating the impact of homelessness are unlikely to be successful long-term.

As a healthcare delivery organisation we provide frontline health services to just under 400,000 people are committed to reducing health inequalities in our population. Every day our services come into contact with many individuals at higher risk of homelessness, including people who are experiencing domestic abuse and/or sexual violence, care experienced young people, people with complex health needs and disabilities, people with substance misuse problems, people with mental health problems, people leaving the armed services, and those leaving prison.

Clinical colleagues also raised the issue of thresholds to receive referrals into services and noted the importance of ensuring that the thresholds are appropriate and aligned to the stated mission to end homelessness. Clinicians provided examples of referring people into safeguarding, for referrals to be declined due to not meeting the “required threshold”.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Yes we agree. We have no additional suggestions.

We are committed to working with other agencies to prevent homelessness in these groups and to work with partners on improved multi-agency action to identify and address locally driven factors contributing to homelessness.

The Health Board has a newly established Homelessness team to co-ordinate our response to the challenge of homelessness internally and with other agencies.

Work is on-going on the development of co-produced Area plan action plans through the regional partnership arrangements with partners from the third sector, voluntary sector, private sector and our citizens to secure more seamless care in communities.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

From an acute, and specifically older person’s, perspective clinical colleagues feel that the issues faced on a day to day basis are not adequately reflected in the document and are wider than MH/ substance misuse and chaotic lifestyles outlined in the white paper. Homelessness issues encountered on a day to day basis are often due to a much wider range of medical / social reasons as opposed to mental health and this is not reflected in the White Paper.

Operational colleagues fed back that homelessness is an increasing issue that is impacting on flow and leading to patients being retained inappropriately in health facilities in addition to impacting on patient recovery through the de-skilling and deconditioning of people so affected. It is estimated at any given time there are c 20 elderly patients so affected across SBU due to issues with homelessness or accommodation.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Cases are often related to private and social housing, e.g. accommodation no longer appropriate after an acute episode of illness due to issues such as access/ mobility (e.g. following a medical intervention such as amputation), landlords terminating a tenancy whilst a patient is in hospital. There are frequent cases of homelessness due to carer breakdown, resulting in family unable to continue with the caring role within their home and effectively resulting in the patient becoming homeless and requiring accommodation post discharge.

Whilst local models are being developed, there are limited options to support such complex patients e.g. Step down beds, refuge, places of safety for the older person resulting in the patient remaining in hospital for lengthy periods inappropriately.

From a Mental Health perspective, clinical colleagues fed back that patients often have a number of complex issues. These patients have held tenancies for some time but a deterioration in mental health often results in the loss of tenancy. Re-housing is often challenging due to matters such as rent arrears/ substance misuse and social issues. Further consideration of how the proposals facilitate addressing these issues is required.

Colleagues feel that it is vital that engagement with health services and an accommodation of the operational approach to providing care (e.g. use of frequent in-patient care to manage complex conditions) are made a central requirement to assist in managing health related issues that impact on homelessness / repeated homelessness in conditions such as mental illness, autistic spectrum disorders, complex trauma etc. It is particularly important that the expression "lifestyle choice" is eradicated in any refusal or failure to provide services.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Responses included the need at a minimum of:

- A mechanism to facilitate personal identifiable data sharing between sectors
- Common IT platform across organisations (or at least common data standards and data handling protocols),
- Integrated care pathways,
- Pooled budgets/ integrated services.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

The Health Board works in partnership with other organisations on the direct and indirect issues and processes relating to homelessness.

However colleagues feel that whilst good multi organisational processes and established working arrangements are in place, evidence from experienced clinical colleagues of working with people experiencing homelessness / with complex needs is that clients frequently fall between the gaps in health and social services e.g. those with substance use issues are told that they must address these before they can have access to mental health services or trauma services etc. Many will require highly

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

individualised care packages that are well outside traditional care pathways. New duties to co-operate would be helpful in removing some of these barriers preventing support being provided.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

The financial impacts of not providing care and support for complex individuals: these occur through repeated and protracted admissions to expensive acute facilities and services.

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

It is felt that the list outlined in the White Paper is extensive; apart from the suggestion of including those who are functionally illiterate.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

The definition of Domestic Abuse should also include those who are personally connected as in the Domestic Abuse Bill (2021) This is a cross government definition. The bill states that Domestic abuse is “Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members/personally connected regardless of gender or sexuality” For the definition to apply, both parties must be aged 16 or over and ‘personally connected’. ‘Personally connected’ is defined in the act as parties who:

- Are married to each other
- Are civil partners of each other
- Have agreed to marry one another (whether or not the agreement has been terminated).
- Have entered into a civil partnership agreement (whether or not the agreement has been terminated).
- Are or have been intimate personal relationship with each other.
- Have, or there has been a time when that each have had, a parental relationship in relation to the same child.
- Are relatives

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

We would wish to give further consideration to this question and potential unintended consequences during the course of the wider consultation.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

As young people, 16 and 17 years old are still considered children from a safeguarding perspective, risks of abuse and exploitation should also be considered when assessing housing needs. There is a need to ensure that any approach, guidance and/or legislation aligns with statutory responsibilities established under the Wales Safeguarding Procedures.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Colleagues agreed that the proposed changes to the Renting Homes (Wales) Act 2016 should, in addition to any potential benefits, consider the possible negative impacts of allowing 16 and 17 year olds to be occupation contract-holders, as this may lead to further risk of homelessness, and add additional risks to the mental health of young people in this position.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No further to comment to add at this stage.

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Felt question was more appropriate for Local Authorities to respond.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

As above.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

As above.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

As above.

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

Please see "additional comments" section.

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

As above.

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

It is felt that the benefits that might accrue from attention to the wider determinants of health and the opportunities to reduce homelessness through activities aimed at reducing risk by adopting a "prevention" focus require further consideration. (please see additional information section for further detail.)

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

Further consideration is required and advice from Welsh Language colleagues will be sought – we aim to do this during the course of the consultation period.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Swansea Bay University Health Board has a corporate responsibility to improve the health and wellbeing of all our population, not only those who we see in our clinical services. We are committed to becoming a population health focused and competent organisation. On 30th March 2023 our Board approved “A Better Future for All: Swansea Bays Population Health Strategy”.

Our aim is to achieve improved population health through the delivery of an evidence informed approach within the context of Swansea Bay. The organisational focus and operational expression of this is through our four-pillar model. The pillars represent in delivering its population health ambition; namely:

1. As a Healthcare Provider: through the services we provide to our population
2. As an Employer: ensuring the wellbeing of our staff is maintained
3. As an Anchor Institution: through the way we use our resources to benefit our communities
4. As a Productive Partner: utilising partnerships to enhance impact

In our Population Health Strategy, we advocate for systemic action on the building blocks for better health and wellbeing in the population, and reducing inequalities in health. We recognise that being homeless can contribute to shortening people’s lives, and to worse physical and mental health. Securing a healthy standard of living for all, including secure high-quality housing and income security, are central to preventing ill health and improving health and wellbeing in our population.

In responding to this consultation from a population health perspective we recognise that the scope of the proposals is on policy and legislative reform of the “homelessness system” [sic]. However, in order to “end homelessness” any actions mitigating those at immediate risk of homelessness sit within a broader context. Without a parallel approach to addressing the wider factors that drive homelessness in Wales the duty is simply directed at mitigating increasing need. For example: economic development, spatial planning, housing policy, welfare administration, education and employment all play a role in determining housing supply and the allocation of that supply. Additionally, the cost of rent, energy and food as well as the geographical availability of housing and access to transport are all related determinants of health and wellbeing.

Whilst we welcome the proposed “wider duties on the Welsh public service to prevent homelessness”, we suggest that the scope of this duty should be not only on identification and referral of individuals at risk, but also leveraging engagement of those wider structural systems that influence the determinants of homelessness at a local and national level. This approach is consistent with a desire to “end homelessness” by addressing the underlying factors that lead to the risk of, or actual, homelessness. At the least a review of the effectiveness of current approaches to address the risks of homelessness and to address deficiencies would be a valuable element of the proposed duty.

As noted in the consultation paper, the “cost of living crisis” and inflation are increasing barriers to secure housing and risk of homelessness for a growing population of people. As a result, we very much support the proposal to reduce “reliance on so-called poor behaviour and rent arrears to exclude applicants”. It would be very helpful for the White Paper to maximise any other opportunities to leverage change in administrative and financial systems that create insecurity of tenure within the social and private rental housing market and/or increase the risk of homelessness.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

As a healthcare delivery organisation we provide frontline health services to just under 400,000 people and we are committed to reducing health inequalities in our population. Every day our services come into contact with many individuals at higher risk of homelessness, including people who are experiencing domestic abuse and/or sexual violence, care experienced young people, people with complex health needs and disabilities, people with substance misuse problems, people with mental health problems, people leaving the armed services, and those leaving prison. We are committed to working with other agencies to prevent homeless in these groups and to work with partners on improved multi-agency action to identify and address locally driven factors contributing to homelessness.

In summary, we see a duty to end homelessness that is centred on providing access to or securing accommodation for those currently experiencing or at high risk of homelessness, while it may be effective, is of itself an inadequate policy response. A comprehensive approach is required where broader and complementary actions aimed at effectively addressing supply side issues, affordability, quality of accommodation and security of tenure are promoted and supported. Such a broad approach, built on sustained multi-agency and multi-sector involvement, represents a vital investment in improving the social determinants of health to ensure sustainable development of communities and to protect the health and wellbeing and dignity of individuals.

Response 40

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

The increase of duty from 56 days to six months will give local authorities longer to work with clients and allow for more time to appropriately assess housing need and have the right framework of support in place for those that need it. It may also encourage clients to approach and engage with the local authority from an earlier stage. A more collective approach should also encourage better partnership working to improve the outcome for the client.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

None Identified

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

yes although there is a need for clearer guidelines around additional groups such as those leaving custody.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

none identified

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

The proposals in principal will require a collective involvement from a range of partners to identify the reasons for homelessness. However this will need a comprehensive training programme for partner agencies to ensure a clear understanding on what would be required.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

none identified

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Yes

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

A comprehensive training programme and guidance to enable all parties involved to have a clear understanding of roles and duties.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Our opinion is that these proposals are essential in order to support those with multiple and complex needs.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

none identified

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

none identified

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

none identified

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

Whilst we welcome the proposals, there will be challenges in regards to housing stock and already stretched service provision.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

We agree with the proposals and already have an officer in post who sits between both homelessness and social services departments to ensure that there is a joint approach towards each client.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

We fully support any proposal to allow 16/17 year olds to hold occupation contracts.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

none identified

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Whilst we agree with the proposals to increase suitability of accommodation, due to demands for the provision and the current lack of stock levels it will be difficult to achieve the standards in the short term.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

We agree with the proposals and we already hold a common housing register. However as already highlighted there is a lack social housing stock currently to meet the needs of those on the waiting list.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

We welcome the proposals although it isn't clear at present what the demand for these options would be or the availability of these additional housing options.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

none identified

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

The general aims and objectives of many of the proposals are welcomed by ourselves. the cautionary note however is that with the service and provisions already stretched, some of the proposals may be very challenging in the short term most notably housing stock and budget constraints.

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

none identified

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

none identified

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

none identified

Response 41

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No Response

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

No Response

Q5. Do you agree with our proposal to abolish the Intentionality test?

No Response

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No Response

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Prevention is key. Support the third sector organisations that can segue this into schools. That identification and intervention cannot be the responsibility of teachers. It needs skilled professionals i.e. the third sector.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Partially Completed Responses

White Paper on Ending Homelessness in Wales

Response 1

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

The cost of homes and the lack of council property for low income workers is something that needs to be introduced, Inflation and lack of mental health help and drug abuse in some areas suffer the worst.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

More mental health hospitals and drug abuse help

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Welsh residents should get priority

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

The not known number of unemployed, tax paying people in the future

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 2

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

The cost of homes and the lack of council property for low income workers is something that needs to be introduced, Inflation and lack of mental health help and drug abuse in some areas suffer the worst.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

More mental health hospitals and drug abuse help

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Welsh residents should get priority

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

The not known number of unemployed, tax paying people in the future

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 3

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

The cost of homes and the lack of council property for low income workers is something that needs to be introduced, Inflation and lack of mental health help and drug abuse in some areas suffer the worst.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

More mental health hospitals and drug abuse help

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Welsh residents should get priority

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

no

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 4

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

There is not enough legislative changes in regards to long term accommodation, there is no point in adding additional duties to local authorities if there is no significant changes to available long term accommodation resulting in the increased use and length of stay in temporary accommodation. There is no legislative changes to route causes of homelessness. less desirable contract holders are extremely difficult to rehouse, most have had multiple accommodations and lost them through their lifestyle choices, private landlords wont house them and social housing landlords can exclude them from housing waiting lists for their previous unreasonable behaviour. There is no accommodation provision for this type of homeless applicant only temporary accommodation where they will remain until they lose this type of provision.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

more planning legislation for housing associations to build accommodation which is needed for the local area, there has been significant number of new build over 55 accommodation, this is not needed, there is already excessive amount of this stock, why have planning departments agreed the applications when not needed. single person accommodation is required.

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No, this would put additional pressure on available housing stock and will result in presentations from anyone from outside of Wales (England) who still have priority need and intentionally decision. a welsh LA would be burdened with a duty of an applicant who wouldn't be owed the same duty from their original English Borough. The removal of priority need and changes to local connection would unfairly impact welsh authorities and cause even more of a housing crisis.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 5

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

if people cannot obtain social housing if they are already housed they will make themselves homeless (stop paying rent, walk away from private rentals) in order to access social housing. This coupled with no longer being able to find applicants intentionally homeless, will , in my view, create even more people who are homeless in order to acheive social housing

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

We are currently unable to accomodate everyone who is priority need. By removing this, we will just increase the pressure on temporary accomodation and homeless departments and have more rough sleepers

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

not really as applicants will just go from LA to LA and it will create more administration checking between each other about previous applications

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

massive increase in applications to already overstretched homeless departments

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 6

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

It targets the most vulnerable, those who are already homeless, but also putting in preventative measures by helping those who may become homeless soon. Giving extra support to those under 25. Protecting people who are at risk of or are fleeing from domestic violence. Keeping people in their own communities will help as they are more likely to have a support network there.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Education at school on things like finances, how to pay bills etc. Many young people move out of their family home not able to do these sorts of tasks.

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes, for many people staying in their local communities would be helpful, those with children for example. But if someone is trying to escape domestic violence or other kinds of abuse then moving somewhere they will not be known will be beneficial.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

If those in need are identified early enough they may be able to get the help they need sooner, making their time as homeless shorter or even avoiding homelessness altogether.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Yes I agree. I would also consider adding health to the list, as mentioned, an emergency department of a hospital, but also those who work in the community; Health Visitors and GP's.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

The healthcare needs of the whole family must be acknowledged, including the mental health of the child, what impact is homelessness having on the child? Also, perinatal mental health, Will the needs of a pregnant woman or a woman who has recently given birth be considered?

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Staff to have relevant training and resources available to aid their role.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

This is dependant on the needs of the individual and the extent of the complexity of needs.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Unsure

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Care leavers. The House project in Scotland
Available at: <https://www.crisis.org.uk/ending-homelessness/resources-for-practitioners/homelessness-prevention-guide/midlothian-council-and-the-house-project/> (Accessed: 21 November 2023).

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 7

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

more preventative work to allow for less fire fighting and more proactive work

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

case coordination - someone needs to take accountability

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

yes, for some they need to move for their own safety. LA need to show more flexibility. these decisions also need to be made more in advance

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

yes - re offending costs millions every year, if we prevent this by providing basic needs to people then this cost will reduce

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

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No Response

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No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

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No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 8

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

yes

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

don't know

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

yes

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

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Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

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No Response

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No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

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No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 9

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

Lack of funding for the required staff needed to drive the focus of prevention.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No - opens up grey areas of LA officers when completing assessments. Difficulty defining certain groups proposed and how does one provide evidence to satisfy their local connection under the proposed local connection groups.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Agree

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 10

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

I agree with the proposals of the White Paper.
Unfortunately, it does not go far enough.
We will only sort out the housing crisis by building more social housing stock.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

The council must take action against unfit landlords. People are trapped in poor housing, suffering from disrepair and overcrowding, and unable to move. When people are living in these circumstances, they are paying a considerable amount in rent and are in danger of being made homeless. They are also frightened to complain as the private landlord could give them notice to leave the accommodation.

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes I agree with this.

It is important people are allowed to be near supportive family, friends and social networks.

But it is as important that people need to feel safe and secure in the area they are living in.

So making sure the council looks at the homeless person in a holistic way, but always they need to listen to that person.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Currently I am unaware of any costs and benefits that the Regulatory Impact Assessment has not accounted for.

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

I agree with this proposal as it deals with the Welsh Government's duty to identify people at risk of homelessness. This helps services to work together to ensure they work effectively to prevent homelessness. To identify and refer those at risk of homelessness to the relevant services. A duty to identify and cooperate (currently imposed by section 95 of the HWA 2014), to ensure a more comprehensive number of public services are engaged and responsible for making homelessness rare, brief and unrepeatable.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

I agree with the proposed relevant bodies to assist in identifying, cooperating with, and making appropriate referrals to the relevant services that help people at risk of homelessness.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

I agree that the White Paper has struck the right balance between legislative requirements and operational practice, particularly regarding health. The Housing Wales Act (2014) provide the duties and powers to prevent and alleviate homelessness. Health services target groups that traditionally did not

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

engage with mainstream health care services, for example, people who have drug and alcohol difficulties, mental health, vulnerable migrants, victims of slavery and human trafficking.

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

A proposed duty to identify and refer will rely on educating those working in relevant parts of the Welsh public services can recognise the risk factors for homelessness, including rent arrears, financial difficulty, abuse or relationship breakdown.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

To prevent homelessness amongst people, the risk of homelessness is identified for people with multiple and complex needs. The social services department should make a referral to the local housing authority, especially if they consider there are unmet social care needs. A social care needs assessment should be carried out, and appropriate action should be taken to meet their needs. When the mental health team assesses and identifies someone at risk of homelessness, they should refer to the local housing authority. If they consider there are unmet mental health needs, they must take action alongside the referral to meet their needs.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

I believe the White Paper has considered all costs and benefits.

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

The White paper has included this list of what society deems are the most disproportionately impacted by homelessness:
Children, young people, and care-experienced young people.
People with complex health needs, including mental illness or mental health

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

problems, substance misuse and those leaving the hospital.
Survivors of violence against women, domestic abuse and sexual violence.
Disabled people.
Ex-armed services personnel.
People are leaving prison.
People with No Recourse to Public Funds.
I agree that the Welsh government has included the people disproportionately impacted by homelessness. I would also include people with additional needs in this list, even down to their inability to read letters from your service and missing deadlines.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Reading the White paper, I believe the Welsh Government has implemented policies to prevent and relieve homelessness.
Fundamentally, the most crucial action the Welsh Government should undertake is to build more council houses. This would be groundbreaking in the prevention of homelessness.
Another issue I have observed is the annual housing letter written to people on the housing waiting list, enquiring if they still want to be on the housing waiting list. If the person forgets to return the letter, they are immediately put on the bottom of the housing waiting list. I believe this is unfair, and there is no consideration for people whose first language is not English. People with mental health diagnoses are going through an acute phase in their illness and are unable to carry on their daily activities. Especially answering letters.

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

The benefits are the collaborative work between the homeless services, which will benefit those at risk of homelessness.
The challenge could be a lack of qualified staff to understand their roles in the homeless sector. Does the Welsh Government have enough staff in this sector? I have observed the long waiting lists in Cardiff Library wanting advice and support regarding their housing application.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

I am glad that the Welsh Government understands the difficulties of vulnerable young people who need a secure home.
Homeless young people are incredibly vulnerable, and they probably need more support when they leave care.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Places of safety that will teach them life skills raise their self-esteem and placements in 24-hour staffed placements.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

I agree that they should be allowed to have an occupation contract but still have support from social services and housing. The White Paper proposal should offer support to these young people so they can hold an occupation contract, as they are a vulnerable group because of their upbringing and will need acute support to undertake an occupation contract.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

I am unsure.

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

I agree with the short-term proposals to ensure people are moved into suitable accommodation for their specific needs.
Single women with young babies and asylum seekers placed in hotels are not suitable placements for this vulnerable group.

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

I support the proposals for social housing allocation as it promotes a collaborative approach between local authorities and registered social landlords, which can help prevent homelessness. I believe the housing stock should be transferred back to the Housing authorities, not the registered social landlords as prominent asset holders.

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

I disagree with the proposal

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 11

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

I agree with the proposals in the White Paper, but I believe we need to take more drastic action to tackle the housing crisis and homelessness by significantly increasing the availability of social housing.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

"The council needs to take action against landlords who provide unfit housing to tenants. Many people are stuck living in homes that are in disrepair and overcrowded, which poses a significant danger to their health and mental health. Unfortunately, tenants are often afraid to complain about the conditions they are living in, health and safety as they fear eviction and the possibility of being made homeless."

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

No

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Yes I agree with this proposal. It is important people should be moved near supportive family, friends and social networks. But it is as important that people need to feel safe and secure in the area they are living. So making sure the council looks at the person holistically.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

Organisations should work together to facilitate discussions about individuals in a holistic manner.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

I agree with the relevant bodies that have been proposed.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

I believe you have included all vulnerable groups in the White Paper.

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 12

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No Response

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 13

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

We welcome the extension to the statutory time period for being 'threatened with homelessness' from 56 days to 6 months. Our own research suggested that that this may reduce instances of homelessness as the longer time period allows agencies to mitigate the risk of becoming homeless and, ideally, eliminate it. That's why Helping End Homelessness welcomed initiatives that looked beyond this narrow window to take an even more preventative approach.

We engaged with those with lived experience of homelessness during the development of our Helping End Homelessness programme, and this suggests that the co-design of support is essential to the success of homelessness prevention. By giving those who will benefit a genuine stake in Personal Housing Plans, we feel this will make it more likely that tenancies will be maintained and homelessness reduced.

Similarly, providing applicants a with a right to review the steps taken to support them and the suitability of the accommodation they are offered provides them with the choice and the control that the learning from our Fulfilling Lives programme in England suggests is essential to building trust with people with multiple and complex needs.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

No Response

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Should the local connection test be maintained, we feel it is important that the list of exemptions should take account of those whose personal circumstances may make it difficult to return to their 'home' local authority. Taking a trauma-informed approach to providing support, one which placed the needs of people ahead of any geographical or residency requirements, was a funding priority for Helping End Homelessness. The negative impact of adverse childhood experiences (ACEs) on health, wellbeing and life chances is now well documented, with the majority of those experiencing homelessness having been exposed to them. For reasons of mental wellbeing, it may prove challenging for some individuals to stay in their 'home' local authority. This should be considered when developing the list of exemptions.

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

We support and recognise the need for public bodies to cooperate in making homelessness brief, rare and non-recurrent.

Many presenting as homeless often have multiple complex needs that require support from several services. When we developed Helping End Homelessness, our research and consultation highlighted a perceived failure of public services to integrate to meet the needs of people who are homeless, and this is part of the systemic failure that lies at its root cause.

Consequently, the programme prioritised service innovation as one of its key foci. With most services focussed on crisis response rather than prevention, we identified an urgent need to rebalance provision so that it deals with both those in crisis now and preventing homelessness from happening in the first place.

Too many opportunities to spot and prevent homelessness are currently missed, such as: prison leavers being released from prison to the streets; patients being discharged from hospital when they are known to be homeless; care leavers leaving local authority care without a permanent home. Such people are at the greatest risk when services are disjointed and disconnected, which is why we actively sort projects that developed seamless and comprehensive services that put the needs of the service user at their heart.

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Our evidence pointed towards this need to integrate services. Part of our person-centred, trauma informed approach involves getting people with multiple, complex needs, help from services. Partnership working is something The Fund identified as being essential for success. We would further recommend an approach that also tackles the discrimination sadly experienced by some people who are homeless during their engagement with public services. A trauma-informed approach is central to tackling this, and will be essential to ensuring that people who are homeless or at risk of homelessness get the help they require across public services.

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

We strongly recommend the need to engage with the Private-rented sector (PRS) and we welcome the duty on private landlords to refer those at risk of homelessness to the LHA. However, we also feel that this should be accompanied with support and advice for landlords to tackle some of the concerns that exist regarding taking on vulnerable people as tenants.

With limited social housing options, the PRS has been the main focus for local authorities in discharging their duties under the Housing (Wales) Act 2015. Our consultation highlighted that there has been reticence on the part of private landlords to take on those at risk of or experiencing homelessness due to concerns about rent arrears or the multiple challenges that some face. For those without complex needs, support needs may be around basic life skills like household budgeting, for example. We required the projects we funded to provide tenants with the support that they need, and to private landlords so that they can better understand the issues and know what support is available for their tenants.

If a truly preventative approach is to be taken, we believe that a duty on public bodies to cooperate with Third sector organisations providing support to people who are homeless, or at risk of being so, is also crucial. The Third sector is an invaluable source of expertise and support that is often better placed than the Public sector to deliver the type of person-centred support required to vulnerable people to either prevent or tackle homelessness.

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Case co-ordination is as vital to addressing and preventing homelessness as the need for partnership working. It is needed to assist people with multiple and complex needs, and should be embedded within a trauma-informed approach.

Our Fulfilling Lives programme in England defined multiple needs as experience of two or more of the following: homelessness; offending; substance misuse, and mental ill-health (1) . Over half of the people benefiting from this programme experience all four of these needs, with nearly all having experienced at least three. These needs are known to be interrelated and mutually reinforcing, and are not the only needs that can contribute to multiple and complex needs. As indicated previously, the programme found that co-designing support with the individual it is designed to benefit is essential to ensuring engagement with services and building trust.

(1) <https://www.tnlcommunityfund.org.uk/media/insights/documents/Understanding-multiple-needs-Briefing-Two-2019.pdf>

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

While we support the inclusion of those listed in the White Paper as being in need of additional targeted activity, we stress the importance of intersectionality when considering groups who may be disproportionately impacted by homelessness. People rarely fall into distinct categories, and the unique experiences of people with multiple protected characteristics and other forms of disadvantage cannot be neatly labelled under single headings. Characteristics, their socio-economic standing and other lived experiences such as ACEs may mean that someone is facing multiple challenges that intersect in a complex manner resulting in their current situation. We therefore strongly recommend that intersectionality is an important factor when considering additional targeted support for those who are homeless or at risk of being so.

Recent internal research commissioned by The Fund to help us improve our own approach highlighted the need for us to consider intersectionality as a way of tackling inequality. The complexity of intersectionality makes it difficult to address but, put simply, organisations involved in providing targeted activity to alleviate homelessness need to be aware of, and account for, all forms of discrimination and disadvantage that people could face, and how those could interact.

With this caveat pertaining to intersectionality, we believe that there are three further groups that should be added to the list of those who need additional targeted activity:

People who are black or from ethnically minoritised communities

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Recent research funded by the Oak Foundation conducted by Heriot Watt University entitled Homelessness Amongst Black and Minoritised Ethnic Communities in the UK suggests that there is overwhelming statistical evidence that people from Black and minoritised ethnic communities, taken as a whole, experience disproportionate levels of homelessness in the UK (2). These groups seem particularly exposed to 'statutory homelessness', that is, applying and/or being accepted as homeless by a local authority. Startlingly, Black people are three and a half times as likely to experience this as White British people. The evidence suggests that in Wales, statutory homelessness shows a high incidence of homelessness for Black and Mixed ethnicity-led households and a slightly higher incidence for Asian-led households. It further suggests that experience of discrimination, harassment or abuse on grounds of race or ethnicity in housing, or in other aspects of life, appears to be associated with elevated risks of homelessness.

People who are LGBTQ+

LGBTQ+ people being more likely to experience homelessness than the general population, LGBTQ+ young people in particular. Stonewall reports that 18% of people who are LGBTQ+ in Britain have experienced homelessness (3), including 25% of transgender people (4). 24% of young people experiencing homelessness across the UK identified as LGBT+, and 9% of young people accessing Llamau's services in Wales identified as LGBT in 2017/18 (5). People who are LGBTQ+ are also more likely to experience poor mental health and engage with substance misuse, making them more likely to present with multiple, complex needs that require integrated services to assist them. For young people who are LGBTQ+, the main cause of homelessness is family breakdown or a lack of acceptance when a young person begins to express their gender and/or sexuality.

Those at risk of or experiencing homelessness in rural areas

The availability of affordable and suitable housing is reduced in rural areas, and the dispersed nature of services makes it much more difficult for homeless individuals to access services. The number of people experiencing homelessness in rural areas is difficult to assess, and it is thought that there is more 'hidden homelessness', as opposed to be people sleeping rough. This, combined with difficulties in presenting themselves to homelessness services, means rural homelessness needs bespoke services to tackle it. This is why we decided to launch a second round of Helping End Homelessness with a specific focus on projects operating across rural areas.

(2)

https://pure.hw.ac.uk/ws/portalfiles/portal/67022958/Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf

(3) <https://www.stonewall.org.uk/lgbtq-facts-and-figures>

(4)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721642/GEO-LGBT-factsheet.pdf

(5) <https://www.llamau.org.uk/Handlers/Download.ashx?IDMF=f8143503-b94e-4466-92cf-a65f8576ae43>

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 14

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No

Q2. What are your reasons for this?

Adeiladu tu fewn i'r ardaloedd sydd am fod yn werth ei wneud.
Er enghraifft yn yr hen Cyngor Dwyfor fe adeiadwyd rhwng 10 ag 20 o dai Cyngor ym mhob Pentref a oedd yn prosiect ardderchog ac yn ffordd o hybu y Gymdeithas Lleol a digartrefedd.

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Edrych a'r yr opsiynnau i gyd, sicrhau bod Cynllunio yn hybu adeiladu tai lleol a tai Fforddiadwy
Bod y polisia Cynllunio Lleol neu Genedlaethol, yn gefnogol.

Q4. Do you agree with our proposal to abolish the priority need test?

No

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

Cysylltiad Lleol yn hanfodol er mwyn cadw'r Gymdeithas Gymraeg, ac yn cael blaenoriaeth

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Na'c oes

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes

Please give your reasons:

Rhaid i'r polisia sicrhau blaenoriaeth Lleol, ac yn anoddach i'r sector preifat lle mae yna ormodedd o Dai Haf

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

Sylw i ardaloedd sydd a gymaint o Dai Haf, a dileu unrhyw hen ganiatad Lleol am Ail Dai/Tai Haf

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Fwy o pwyslais a'r Dai Lleol a Fforddiadwy

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

Symud ymlaen yn gynt, defnyddio Cymdeithas Tai yn lle arafwch Cyngorau Sir.

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

Trafod gyda Pobl Ifanc yn Lleol, arweiniad trwy y Gymdeithasau Tai iddynt.

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Mae Tai Lleol/Fforddiadwy yn flaenoriaeth, mae rhaid sicrhau bod y Cyllid yn flaenoriaeth hefyd.

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

Eto grwpiau fel Clybiau Ieuencid a Chwaraeon, ei dyfodol nhw sydd yn pwysig

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Yr unig ddeddf ydi ymateb yn gynt i'r angen, ac mae ffeithiau yn erchyll, o wneud ddim digon, Ymlaen

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

Sicrhau bod yna fflatiau cychwynol, fel bod yna siawns i'r Pobl ifanc setlo mewn Cymdeithas. A bod ein Cynghorau Lleol yn gefn iddynt.

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

Mae rhaid i Gyllid sydd yn ymwneud a hybu Rhiantu a Ataliol fod yn " Ring Fenced " a fydd yn gwarchod yr angen
Tydi'o ddim a'r hyn o bryd.

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

Ydwyf gyda'r Cynghorau Lleol yn gefnogol ac yn gyfreithiol gyda arweiniad.

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Y gost fwya i'r digartrefedd ydi ddim symud ymlaen,
Mae angen hyder yn y flaenoriaeth.

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

Defnyddio Llety mewn argyfwng yn unig

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

Angen rhestr tai, ond yn unol a phwyntiau, a bod yn Lleol Gymraeg yn ystyried cynta

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

Fel yr uchod bod yna flaenoriaeth i deuluoedd Lleol a Chymreictod yn cynta, er mwyn y Gymdeithas Lleol.

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

Manteision gorau a fuasa i'r Senedd rhoi nod a chodi dyletswyddau Gymdeithas Tai i ymestyn datblygiadau o dai Lleol/Fforddiadwy
Y gost ydi peidio symud ymlaen.

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

No Response

Q26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Q27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 15

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

No Response

Q2. What are your reasons for this?

No Response

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Consider the wider promotion and use of Charitable Housing models such as Almshouses which can be specifically targeted at specific demographics.

Q4. Do you agree with our proposal to abolish the priority need test?

No Response

Q5. Do you agree with our proposal to abolish the Intentionality test?

No Response

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

No Response

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

No Response

Q13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

No Response

Q15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

No Response

Q16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

No Response

Q17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

No Response

Q18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

No Response

Q19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

No Response

Access to accommodation

Q20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

No Response

Q21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

No Response

Q22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

No Response

Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

No Response

Q25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

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No Response

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

White Paper on Ending Homelessness in Wales

Response 16

Reform of the existing core homelessness legislation

Q1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

Q2. What are your reasons for this?

No one should be homeless

Q3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Police should enforce present laws

Q4. Do you agree with our proposal to abolish the priority need test?

Yes

Q5. Do you agree with our proposal to abolish the Intentionality test?

Yes

Q6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

yes

Q7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

People who ignore the laws

The role of the Welsh Public Service in preventing homelessness

Q8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

No Response

Q9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

No Response

Q10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

No Response

Q11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

No Response

Q12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

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Targeted proposals to prevent homelessness for those disproportionately affected

Q14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

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Access to accommodation

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Q23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

No Response

Implementation

Q24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

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