

## Agenda – Equality, Local Government and Communities Committee

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Meeting Venue:	For further information contact:
Video Conference via Zoom	Naomi Stocks
Meeting date: 25 February 2021	Committee Clerk
Meeting time: 13.00	0300 200 6565
	<a href="mailto:SeneddCommunities@senedd.wales">SeneddCommunities@senedd.wales</a>

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### Pre-meeting (13.00 – 13.30)

- 1 Introductions, apologies, substitutions and declarations of interest
- 2 Inquiry into fire safety in high rise blocks in Wales (Welsh Government white paper – Safer Buildings in Wales: A Consultation): evidence session 1  
(13.30 – 14.30) (Pages 1 – 49)  
Owen Jayne, Group Manager, Head of Business Fire Safety, South Wales Fire and Rescue Service  
Siôn Slaymaker, Group Manager, Head of Business Fire Safety, Mid and West Wales Fire and Rescue Service  
Bob Mason, Head of Business Fire Safety, North Wales Fire and Rescue Service

### Break (14.30 – 14.45)

- 3 Inquiry into fire safety in high rise blocks in Wales (Welsh Government white paper – Safer Buildings in Wales: A Consultation): evidence session 2  
(14.45 – 15.45) (Pages 50 – 62)  
Paul Edwards, Senior Regional Director, NHBC



Peter Richards, Chair, Local Authority Building Control Cymru

Andrew Thomas, Senior Building Control officer, Fire Safety working Group,  
Royal Institution of Chartered Surveyors

## **Break (15.45 – 16.00)**

### **4 Inquiry into fire safety in high rise blocks in Wales (Welsh Government white paper – Safer Buildings in Wales: A Consultation): evidence session 3**

(16.00 – 17.00)

(Pages 63 – 89)

Jason Clarke, Head of Risk Management, Warwick Estates

Nigel Glen, Chief Executive Officer, ARMA

Mark Snelling, Health, Safety and Fire Advisor, ARMA

### **5 Paper(s) to note**

(Page 90)

#### **5.1 Letter from the Chair of the Petitions Committee in relation to fire safety in high rise buildings**

(Page 91)

#### **5.2 Report from the Bevan Foundation "Different experiences of poverty in Winter 2020" in relation to the impact of COVID-19**

(Pages 92 – 113)

#### **5.3 Report from the British Red Cross "The longest year" in relation to the impact of COVID-19**

(Pages 114 – 180)

#### **5.4 Letter from the Minister for Housing and Local Government in relation to the impact of COVID-19 and rough sleeping**

(Pages 181 – 187)

- 6 Motion under Standing Order 17.42(vi) to resolve to exclude the public from the remainder of the meeting and from the meeting on 4 March 2021**
  
- 7 Inquiry into fire safety in high rise blocks in Wales (Welsh Government white paper – Safer Buildings in Wales: A Consultation): discussion of the evidence received**  
(17.00 – 17.15)
  
- 8 Discussion of the Committee's legacy report**  
(17.15 – 17.25) (Pages 188 – 193)

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Papur 1

Paper 1

## Safer Buildings in Wales: A Consultation

### A Building Safety White Paper

The White Paper sets out proposals for comprehensive reform of legislation that contributes to building safety. Welsh Government are proposing a new Building Safety Regime for Wales. This will present a significant overhaul to the existing system, it would also result in the most expansive building safety regime in the UK.

Welsh Government acknowledge risks are not limited to high rise buildings alone and so they propose to go further and include other types of residential building where they recognise there is a risk from fire or structural safety that has the potential to impact upon significant numbers of people.

South Wales Fire & Rescue Service welcome the Welsh Government White Paper and the significant step forward in their commitment to improve the Building Safety Regime in Wales. However, there are several key aspects though where Fire and Rescue Services remain concerned.

Welsh Government propose that the scope of the Building Safety Regime covers all multi-occupied residential buildings. This refers to any building where there are two or more dwellings, regardless of whether there is a shared front door to the building. This means that the scope of the regime would capture a house converted into two flats, a licensed HMO through to a high-rise apartment block.

As such they are proposing that there are two new categories of building set out in the Building Safety Regime.

**Category 1** – these buildings would be subject to the most onerous requirements of the Building Safety Regime. These buildings **will be 18m or more in height or more than 6 storeys and contain two or more dwellings.**

**Category 2** - these buildings would be subject to numerous requirements of the Building Safety Regime. These buildings will be residential properties **with two or more dwellings that are no more than 18m in height.**

It's imperative that the recommendations from the Grenfell Inquiries are properly considered in order to fix the broken system identified by Dame Judith Hackitt and



restores the public confidence in fire safety especially for those who reside in properties that come into scope.

The Building Safety Bill is a huge breakthrough and secondary legislation will follow, this along with the Welsh Government Safer Buildings in Wales Consultation is a step in the right direction.

The new Bill will amend the Fire Safety Order 2005 to clarify the responsibilities of the person nominated as the duty-holder for multi-occupied buildings. This clarification will empower fire and rescue services for the first time to take enforcement action and hold building owners to account if they are not compliant with the structure and external walls of the building, including cladding, balconies, windows and entrance doors to individual flats that open into the common areas.

It is SWFRS experience that when dealing with enforcements on High Rise Residential Buildings how complex some ownership arrangements can be. It causes confusion for the Enforcing Authority and residents when it comes to who's responsible for the safety of their building.

The introduction of duty holder roles during design, construction and occupation phase and identifying accountable persons will go some way to alleviating this, providing the addition of multiple 'Responsible Persons' under the new regime won't add further layers of complexity to what's already a significant challenge.

On behalf of South Wales Fire and Rescue Service Group Manager Owen Jayne Head of Business Fire Safety.

## Key Changes

### ***Issue 1***

***Para 2.3.1 The scope of the BSR to cover all multi occupied buildings that encompass 2 or more dwellings.***



The widening of the scope of buildings i.e. 'any building where there are two or more dwellings' will create a vast increase in BFS workload requiring additional resources. Firstly buildings of this type would not normally form part of the Risk Based Inspection Programme (RBIP) in SWFRS. Secondly due to the proposed increase in FRS involvement in the gateways process would have significant increase in workload for SWFRS.

Additionally this will inundate FRS with directing resources to areas we would not normally focus on, smaller dwellings often considered by LA housing and our CS colleagues. We would now have a mandatory duty to respond.

However we feel the scope of the BSR should also encompass **specialised housing** due to the increasing risks associated where vulnerable occupants reside, without the ability to self-evacuate and without staff assistance to evacuate.

The standards of design, construction and maintenance of these buildings is imperative to the safety of older or more vulnerable members of our communities and are increasing in numbers (e.g. sheltered, extra care, supported living, independent living etc.). It is vitally important that the new regime be implemented to cover these types of premises to ensure the evacuation strategy is right for the residents and the design of the premises.

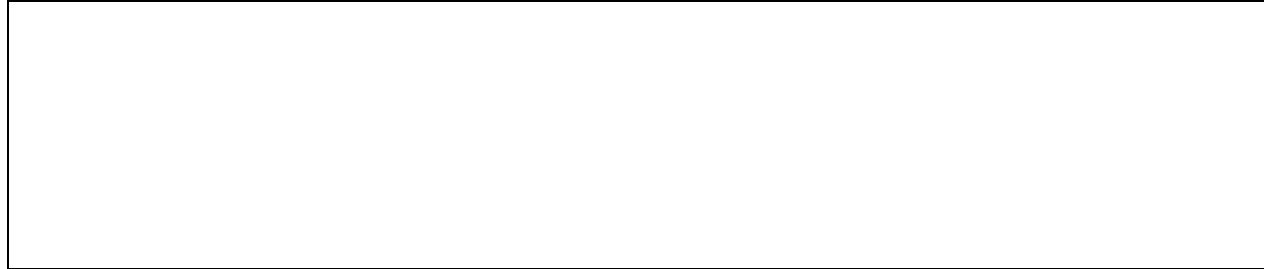
### **Issue 2**

**Para 2.3.2 Different requirements depending whether Category 1 or Category 2 (Option A) or (Option B) figure 5 Advanced, Enhanced or Standard buildings.**

Regardless of choice of options, FRS will be involved heavily throughout the lifecycle of the building. By increasing the duties of the responsible persons/duty holders, the FRS would have to transform the current audit process for instance to encapsulate the safety case that would become a requirement, the inspection of external cladding and balconies. This is reliant on secondary legislation to allow FRS to go beyond the front door.

### **Issue 3**

**Para 3.5.13 The workplace focus of the FSO means we think it is likely that a new Building Safety Regime will need to be designed, separately from the FSO. Meaning the FSO would remain for workplaces, but it would no longer apply to dwellings.**



If SWFRS were to become regulators of BSR, there will be an additional set of rules/legislation we would need to become competent in, alongside the FSO? This would increase the training burden and take time to embed.

#### **Issue 4**

***Para 5.5.1 WG proposals would mean that single flats above commercial premises (like shops or pubs) would not be covered, Mixed residential/commercial***

Proposal that this type of premises will not fall within scope of BSR.

We know that the risk to residents of these properties can be very high if the commercial premises themselves are high risk, such as restaurants and takeaways which form large proportion of our enforcement action in SWFRS.

Paragraph 5.5.2 proposes to strengthen the FSO legislation to improve fire safety in such premises which we advocate, however this will take time. Legislative changes will have to be well planned to ensure these high risk premises do not 'fall out' of legal scope.

#### **Issue 5**

***Para 6.2.1 Golden Thread is a living record of the building, it will support the Gateway process as well as the ongoing management of the building Existing buildings***

Collating and accessing relevant information for the golden thread will prove challenging and may impact on how we would regulate against this. This information would need to be accurate, current, and in a consistent format, it would include the Fire Statement, Full Plans, a digital model of the building, a Fire and Emergency File.





This would form the majority of cases for the regulatory authority whilst conducting audits in line with the Risk Based Inspection Programme (RBIP), but the design of such software so it's accessible by all the regulators would need to be considered.

Golden Thread: Up to date information on design, construction and ongoing maintenance of Cat 1 buildings.

- To be kept in digital form – this could create IT software issues as relevant information would need to be available on mobile terminals for our Operational crews attending incidents along with the Fire Safety Department.
- Key data sets would also be collected for Cat 2 registration process for occupation.

A key recommendation of the Grenfell Tower Inquiry Phase 1 that that the owner and manager of every high-rise residential building be required by law:

- To provide their local fire and rescue services with up-to-date plans in both paper and electronic form of every floor of the building identifying the location of key fire safety systems;
- To ensure that the building contains a premises information box, the contents of which must include a copy of the up-to-date floor plans and information about the nature of any lift intended for use by the fire and rescue services.

**Issue 6**

**Para 6.3.2 Introduction of duty holder roles during design and construction and occupation phase. Client, Principle Designer, Principle Contractor, Designer and Contractor.**

**Design and construction**

This will potentially create additional authorities/persons to liaise with on the projects. Although Building Control Authorities would still be the main POC for consultations.

**Occupation phase**



- Accountable Person – identified and registered
- Additional Building Safety Manager for Cat 1 buildings
- Responsible for annual FRA, ensuring compartmentation, safety case and mandatory reporting to regulators. Again the latter would increase workloads and over burden FRS' depending on experience and knowledge of accountable person/building safety manager.
- Additionally reference made to greater FRS involvement in Cat 2 buildings due to expertise with FRA's (page 101). This could inundate us with additional work.
- Reference under 2.10.2 on page 12 made to firefighting due to an outbreak of fire – **we would question who would do this in residential buildings and their training.**

**Issue 7**  
**Para 6.4**

**Fig 7 Gateways:**

- 1) **Before planning permission is granted,**
- 2) **Before construction begins,**
- 3) **Before occupation.**

FRS involvement at **all** gateways would need to be suitably resourced. Currently FRS's are predominantly involved at Gateway 2, Building Regulations Consultations, and following occupation of the building.

Gateway 1) only for Cat 1 buildings in addition, those buildings the key dataset's will include and would need to be audited during inspections;

- Façade and structure information
- Dates and outcomes of gateway points and Safety Case reviews
- Current and past duty holders, including accountable persons.

Safety issues are considered as an integral part of the lifecycle process by incorporating periodic reviews at critical stages of any building development. They will also introduce 'hard stops' in the system, where work cannot continue without evidence that building safety is being appropriately managed.

WG also intend to introduce Gateways for Category 1 buildings that are undergoing a significant refurbishment or a change of use.



This would increase the workload for FRS's who could be drawn in to the appeals process should they disagree with the Fire Statements, Planning Applications or Fire Strategies, if it is felt they are not suitable and sufficient and initiate a 'hard stop'. There would need to be very clear on lines of responsibility and expertise, with potential insurance premium implications through increased responsibilities.

**Issue 8**

***Para 6.4.8 Consideration to make FRS 'specific consultation bodies' under the Town and Country Planning Regulations 2005, which would make it law for planning authorities to consult with us.***

For Cat 1 buildings, a Fire Statement will be required and the FRS will be responsible for identifying errors when undertaking the statutory consultee role.

Additionally the document mentions the FRS have a role to advise developers on surrounding areas that may constitute a hazard, on 'the type and number of appliances' that might respond (essentially Pre Determined Attendance PDA for that premises type).

Gateway 2 comments on supporting evidence to include full plans, a digital model of the building (could be further IT requirements), fire emergency file and construction control plan. All these sit with the Fire Statement and would have to be assessed during the Building Regulations consultation process.

SWFRS have already responded to Welsh Government consultation on 'Fire and Rescue Authorities becoming statutory consultees in the development management process' (issued: 28 July 2020). We provided a detailed response as to the impact on the Service of the increased workload. On the figures provided by Welsh Government (Major Planning Applications), it has been determined that this additional work would result in excess of 700 hours per annum for SWFRS.

A financial impact assessment is currently being conducted by Welsh Government to determine the impact across all partners of the proposal.

**Issue 9**

**Para 8.2.4 Promoting Building safety, Informing residents:**



For the most part this could consist of signposting residents to the general fire safety advice (and more tailored help for high-risk individuals) that Fire and Rescue Authorities provide. This has the potential to increase ad hoc requests for advice to both Business Fire Safety and our Community Safety departments.

SWFRS have prior experience of supporting both social housing and private sector landlords to engage and educate residents in fire safety matters.

**Issue 10**

**Para 8.5.3 Rescue of residents unable to escape by FRS**

In the absence of a Personal Emergency Evacuation Plan known as a PEEP as in social care, it will often be necessary for firefighters to rescue individuals who cannot leave the premises unaided. To do so, they need to know their location in the building (e.g. flat and floor number) and the nature of any disability the individual has.

Proposal that residents should have the right to supply these details to the Accountable Person, (although no obligation) who would be under a duty to collate them, and supply them immediately to the FRS.

This would need to be collated/shared and kept up to date as this is a dynamic situation. This would create additional work and constant interaction with accountable persons and a reporting mechanism would need to be established.

**Issue 11**

**Para 10.1.3 Building Safety Regulator**

This is still to be determined where it will sit, how it will be structured, funded and the governance of such a Regulator. The sourcing of necessary skills, capacity and expertise could be single or multiple regulators.

The existing regulatory oversight in Wales is split between the three Fire and Rescue Authorities and the twenty two Local Authorities.

Our concern is that multiple regulators in the absence of better collaboration, causes too much confusion and limited opportunity to look holistically at the building, with concerns for regulators acting ultra vires.



## Issue 12

### **Para 10.3 Greater collaboration between regulatory authorities and across the industry**

Collaboration between regulatory authorities will need to be formalised and established at three levels – Strategic, Tactical and data exchange. This will require a joint agreement to determine a RBIP specific to premises within scope of the BSR.

Collaboration across the industry:

- Reference made to collaboration with industry and other authorities with knowledge, residents, and other enforcing authorities across the UK.
- Producing, disseminating and sharing best practise.
- Ensuring accountability by developing annual reports for WG (currently only require N<sup>o</sup> of audits).
- This would increase the FRS role and require greater engagement across the board.

Improved more formal collaboration under a new regime would assist the Multiple Regulators option as it is at present.

In an effort to raise fire safety standards in buildings that fall under the scope of the Fire Safety Order, we believe that the Fire Authority should manage the fire safety element of a Building Regulations application. This should be carried out independently of the Local Authority Building Control Department or Approved Inspector.

SWFRS envisage this to be similar to an application for Building Regulations in that there would be a separate application for 'Fire Regulations' facilitated by the Fire Authorities. Fire Authorities would not only then have enforcing capability when the building is occupied but also during the planning and build stage.

Fire Authorities would then be responsible to 'sign off' fire safety aspects of the building on completion of the build providing the fire safety standards are met. In this respect, Fire Safety Inspecting Officers would then form a fundamental part of the Gateway process to ensure fire safety standards are at the highest possible level.

## Issue 13

### **Para 10.4.11 Greater governance could be introduced**



Regulators will be concerned with ensuring duty holders observe governance requirements in fulfilling their role and responsibilities (e.g. in terms of creation, maintenance and sharing of information and data created as part of the regime).

It also concerns a Regulator's own governance responsibilities in performance of its own functions (e.g. collating building information and working with others).

This comes back to the Hackitt review where penalties against Enforcing Authorities could be equal to those we prosecute, should we get it wrong.

#### ***Issue 14***

##### ***Para 10.5.5 Two potential options for regulation: Single and Multiple***

A single Regulator is going to need to draw upon the expertise and technical experience of existing Regulatory Authorities. This means that existing regulators would still retain involvement in the regulatory landscape therefore FRS would still have an involvement here and possibly increased involvement due to the expansion of premises being brought into scope.

#### ***Issue 15***

##### ***Para 10.8.2 Reference to the Joint Inspection Team (JIT)***

There is uncertainty over the anticipated dynamics of this team but it does reference the need for representatives from existing Enforcement bodies. The JIT would be comprised of a Multi-disciplinary team representing expertise from the existing Enforcement bodies. This is similar to an existing JIT model that has been established in England and in this case the JIT has no legislative powers and can only act in an advisory capacity on behalf of the Local Authority.

The Welsh FRS's are already working with [REDACTED] of WG to scope this out.

The changes proposed in the Welsh Government White Paper and the associated documents referenced below will require the further development and training of individuals. The delivery of effective Regulation depends on the competency of the professionals who undertake the work.



Dame Judith Hackitt Independent Review of Building Regulations and Fire Safety highlighted that the regulatory system for high-rise and complex buildings was not fit for purpose and made 53 recommendations to drive a cultural change across the built environment and the right behaviours within the construction industry and fire sector.

The Review highlighted the need to ensure that those undertaking work throughout the lifecycle of any building have the necessary levels of skills, knowledge and expertise and that government makes sufficient investment in enabling the attainment and monitoring of competency.

The NFCC Competency Framework has been developed for fire and rescue services in England. It provides a framework for the development, maintenance and demonstration of competence of staff who regulate fire safety standards in all premises to which the Regulatory Reform (Fire Safety) Order 2005 (FSO) applies, including Higher Risk Residential Buildings (HRRBs) Category 1 under the Welsh Government proposals.

The Competency Framework will however, will be equally applicable in the devolved administrations as appropriate. It is anticipated that Enforcing Authorities, Local Authorities, Welsh Government will need to fund professional body registration for Fire Safety Regulators who, by virtue of their role, are required to be registered with a professional body, and undergo third party accreditation. The introduction of the Welsh Government Building Safety Regime and possible new Regulator whether option A or B will require a greater level of investment in maintaining competency and the development of new skills required under the new regime.

The above issues are our considerations following the initial evaluation of the White Paper and they do not reflect the full impact on the Welsh Fire and Rescue Services. There are several factors for this, the White Paper is part of the overarching reforms to the Fire Safety Regime following the Grenfell inquiry.

The Welsh Government White Paper, the Fire Safety Bill, Secondary Legislation, National Fire Chiefs Council 'Competency Framework' and the amendment's to all the Guidance Documents we refer to whilst enforcing the FSO will all impact, they will have intended and unintended consequences on the way we deliver and resource our service to the communities of South Wales.

We will respond to the 104 questions posed by the Welsh Government Safer Buildings in Wales, White Paper Consultation in due course with more detail on our thoughts and proposals.



In summary the Fire Service fully support the White Paper Consultation, however Welsh Government must be careful to ensure the new Regime does not inadvertently create a two tier fire safety system. It is reminded that these measures do not retrospectively address the current situation where insufficient fire safety measures still exist in many buildings across Wales.

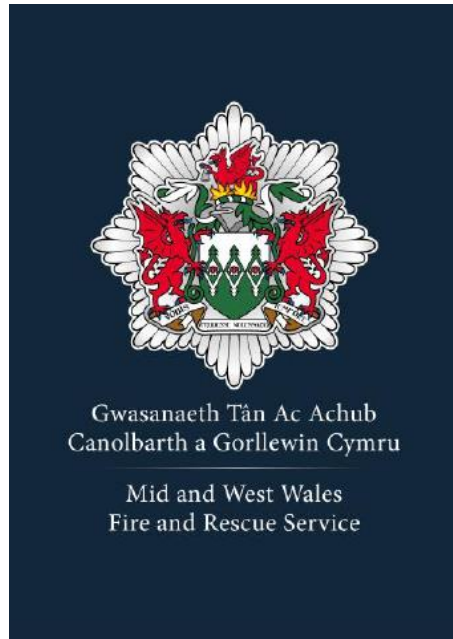
**Diogelwch Tân i Fusnesau**

Pencadlys Gwasanaeth Tân ac Achub  
De Cymru  
Parc Busnes Forest View  
Llantrisant  
CF72 8LX

**Business Fire Safety**

South Wales Fire and Rescue Service  
Headquarters  
Forest View Business Park  
Llantrisant  
CF72 8LX





# Equality, Local Government and Communities Committee

Inquiry into fire safety in high-rise buildings

Mid and West Wales Fire and Rescue Service



## Overview

Welsh Government Consultation Document

Safer Buildings in Wales: A Consultation

A Building Safety White Paper

Welsh Government (WG) are proposing a new Building Safety Regime for Wales. This will present a significant overhaul to the existing system, it would also result in the most expansive building safety regime in the UK.

Welsh Government propose that the scope of the Building Safety Regime covers all multi-occupied residential buildings. This refers to any building where there are two or more dwellings, regardless of whether there is a shared front door to the building. This means that the scope of the regime would capture a house converted into two flats, a licensed House in Multiple Occupation through to a high-rise apartment block.

Within the proposal, the document suggest that there would be two categories of buildings in scope although an alternative model could see this broken down into 3 categories. In terms of the two category approach this would see categorisation as follows:

**Category 1** – these buildings would be subject to the most onerous requirements of the Building Safety Regime. These buildings **will be 18m or more in height or more than 6 storeys and contain two or more dwellings.**

**Category 2** - these buildings would be subject to numerous requirements of the Building Safety Regime. These buildings will be residential properties **with two or more dwellings that are no more than 18m in height.**

Mid and West Wales Fire and Rescue Service (MWWFRS) records indicate that there are 50 High Rise Residential Buildings within our area which fall into Category 1. This may be significantly more as there are another 32 residential buildings which are 6 storeys in height but their height in metres, and as such attainment of the 18m threshold, is not known at present.

The number of Category 2 buildings is difficult to quantify at this stage and further work is ongoing to extract this data. WG have indicated within the document that they estimate that there are between 13,000 and 37,000 qualifying premises in Wales. Initial evaluation of the data we hold suggests that there are in excess of 5,500 premises within the scope of the Category 2 designation for the Mid and West Wales Fire and Rescue Service area.

The regulation of High Rise Residential Buildings has historically provided challenges in identifying the Responsible Person accountable for the building. This consultation proposes a duty holder role for all buildings occupied within the scope of the regime; this is a welcome proposal and will provide clarity and accessibility in terms of engagement and enforcement activities.

## **Priority Areas**

There are a number of elements within the consultation which will impact upon Mid and West Wales Fire and Rescue Service; these are detailed below as priority areas.

### **1. Buildings in Scope**

The consultation proposes that the scope of the Building Safety Regime will cover all multi-occupied residential buildings. This means any building where there are two or more dwellings, regardless of whether there is a shared front door to the building. The scope of the regime would capture a house converted into two flats, a licensed House in Multiple Occupation through to a high-rise apartment block.

Whilst parts of the buildings proposed to be in scope already feature as relevant areas within existing legislation, they would not typically all feature as part of a Risk Based Inspection Programme. The added focus on the Category 2 buildings in particular would place a significant increase in workload on Mid and West Wales Fire and Rescue Service; these are residential buildings of 6 floors or less which consist of two or more dwellings. It is estimated from the data that is currently held that there are in excess of 5,500 buildings of this nature within our Service area.

### **2. Categorisation of Buildings**

The consultation proposes two options for categorisation of buildings in scope. Regardless which option is implemented, the resulting workload will have a significant impact on the auditing activities of the Service and will require proportionate resourcing. The new regime will undoubtedly improve the regulation of building safety for those buildings in scope as will the extended remit of the Fire Safety Bill to provide access and regulatory overview to other areas of the buildings.

### **3. Building Safety Regime and the Fire Safety Order**

The Building Safety Regime will provide an important legislative lever that will increase the safety of occupants of High Rise Residential Buildings and other buildings in scope. It will sit

alongside the Fire Safety Order as complementary fire safety legislation but their application would be distinctly separate. This will require Fire Safety Inspectors to be upskilled to be able to effectively engage in any new regulatory role, this will naturally have an impact on the requirement for training, maintenance of competence and potential restructure of existing Fire and Rescue Service Protection teams' resources.

#### **4. Omissions from Buildings in Scope**

The proposal recognises that single flats above commercial premises, such as restaurants, shops, or pubs, would not be covered by the scope of this proposal. The document proposes to strengthen the Fire Safety Order to improve fire safety measures in such premises.

It is disappointing that these types of premise do not feature within the scope of the proposal as they typically account for a regular purpose group which attracts a regulatory spotlight from Fire and Rescue Service Protection teams. Any amendment to the Fire Safety Order should be robust enough to ensure that these premises are adequately regulated.

#### **5. Gateway Control Points**

Currently, Fire and Rescue Services are involved at the proposed Gateway 2 point which is before construction begins and also following occupation. The current involvement at proposed Gateway 2 is as a statutory consultee for Building Regulations Consultations.

Consultation at Gateway 1, before planning permission is granted, is currently voluntary and Mid and West Wales Fire and Rescue Service (MAWWFRS) receives approximately 5 consultation requests per year. Any increase in statutory consultation workload will inevitably lead to an increased resource demand. This relates not only to the initial consultation response but also with the management of any appeals arising as part of the process.

The gateway control methodology is welcome and will ensure that any issues are dealt with at source and to the satisfaction of the regulating authority at that stage.

## **6. Statutory Consultees**

Prior to the publication of the current consultation document (Safer Buildings in Wales: A Consultation), Mid and West Wales Fire Authority responded to a separate consultation document issued last July (2020) relating to 'Fire and Rescue Authorities becoming statutory consultees in the development management process'. This would see Fire and Rescue Authorities becoming statutory consultees at the pre planning stage and would enable observations to be provided on matters such as water supplies, access for emergency vehicles and proximity to areas prone to instances of wildfire for example. It is estimated that this work will attract in the region of 250 additional consultation requests per year for Mid and West Wales Fire and Rescue Service.

In addition to the proposals within the consultation 'Fire and Rescue Authorities becoming statutory consultees in the development management process', the current consultation (Safer Buildings in Wales: A Consultation) proposes additional duties for Fire and Rescue Services in Wales.

For Category 1 buildings the current consultation proposes that a Fire Statement is prepared to help planning authorities and highway authorities to consider the ongoing requirements of tall buildings and how these features can be safeguarded. Fire and Rescue Services will be expected to bring any errors or omission to the attention of local planning authorities as part of their statutory consultee role.

The current consultation advises that Fire and Rescue Services will have a closer role with developers and advisers on fire safety issues, such as the type and number of fire appliances that may be needed to respond to a fire in any given building.

## **7. Promoting Building Safety**

Promoting fire safety is a statutory function of Fire and Rescue Services under Section 6 of the Fire and Rescue Services Act 2004, this is typically discharged via a raft of fire prevention and fire protection measures.

Mid and West Wales Fire and Rescue Service already engage widely with private, public and commercial stakeholders and the proposed requirement for the Accountable Person to provide general fire safety advice for residents is welcomed. It is likely that as a result of this requirement that requests for advice, education and engagement from both the Community

Safety and Business Fire Safety teams of Mid and West Wales Fire and Rescue Service' will greatly increase.

## **8. Assistance to Evacuate**

It is not normal for a full evacuation to be undertaken in a purpose built block of flats, however in some cases, for instance if a fire spreads out of control this may be necessary.

The consultation proposes that residents who may require assistance to escape in the event of a full evacuation should have the right to voluntarily supply their details to the Accountable Person, who would be under a duty to collate them, and to supply them immediately to the Fire & Rescue Service in the event that an evacuation of the building was necessary.

This site specific information will be valuable in the event of an evacuation event occurring, however keeping any records up to date and current will involve ongoing engagement with the Accountable Person of each building in scope.

## **9. Regulatory Arrangements**

Regulatory oversight in Wales is currently split between the 3 Welsh Fire and Rescue Services and 22 Local Authorities. The agreed model for the new Building Safety Regulator, where it will sit, how it will be structured and funded, and the sourcing of necessary capacity and expertise is still to be determined.

The current regulators have specialist knowledge of building safety although more effective collaboration and effective dialogue would support a stronger regulatory regime. We feel that a wider range of regulators (multiple regulators) would in practice slow regulatory processes and create greater confusion.

Conversely, a single regulator is going to need to draw upon the expertise and technical experience of existing authorities. This means that existing regulators would still retain involvement in the regulatory landscape. What this means in practice is that the extent to which there really is a 'single' regulator could again be tempered by the operational reality.

At this time, Mid and West Wales Fire and Rescue Service is of the opinion that the proposed concurrent regulatory model would best serve the aims of this proposal. This would maintain

the existing model and improve identified deficiencies to strengthen the regulatory regime going forward. This could include developing a framework to clarify which aspects each Authority is responsible for to avoid overlap/duplication of efforts.

### **10. Joint Inspection Team**

The development of a Joint Inspection Team will allow closer collaborative assessment of High Rise Residential Buildings in the first instance. Whilst the Joint Inspection Team will have no exclusive legal authority, it should be the case that the team will benefit and be able to execute the legal authority of its constituent members.

The proposed partners within this team will further enhance existing lines of partnership communication and will be a valuable step towards maximising the safety of residents of buildings in scope. The Fire and Rescue Service will form a key and integral part of the initial Joint Inspection Team and any subsequent team established on a more permanent basis; as a result, consideration will need to be given to how Fire and Rescue Services resource this team and its resulting impact on other statutory Fire Safety activities.

### **Conclusion**

Mid and West Wales Fire and Rescue Service support the consultation and the key themes of its proposals, whilst recognising that there is further work to be done to identify and develop stronger regulation. The proposals are not piecemeal in any way and represent an approach that is stronger, clearer and sustainable for the future, placing the safety of building residents at the forefront of such changes

It is clear that the proposal will have a significant impact on the resourcing demands placed upon Mid & West Wales Fire & Rescue Service. In addition, any future amendments to the current Risk Based Inspection Programme will have a further impact on current statutory work based on existing Fire & Rescue Service resources.



# Equality, Local Government and Communities Committee

Inquiry into fire safety in high-rise buildings

North Wales Fire and Rescue Service

Welsh Government

Consultation Document

Safer Buildings in Wales: A Consultation : A Briefing Note

A Building Safety White Paper

The White Paper sets out proposals for comprehensive reform of legislation that contributes to building safety. Welsh Government is proposing a new Building Safety Regime for Wales. The proposals cover two distinct areas, the building and occupation of residential buildings.

The White Paper is focussed on the changes required to improve fire safety in all multi occupied residential premises that fall into the following two categories:

**Category 1** – these buildings would be subject to the most onerous requirements of the Building Safety Regime. These buildings **will be 18m or more in height or more than 6 storeys and contain two or more dwellings.**

**Category 2** - these buildings would be subject to numerous requirements of the Building Safety Regime. These buildings will be residential properties **with two or more dwellings that are no more than 18m in height.**

Welsh Government proposes to do this by instigating a design and build regime with three hard stop points. These hard stop points are known as gateways. Gateway 1 is the planning stage. Gateway 2 is the detailed plan approval stage and Gateway 3 occurs at occupation. At all three gateways the FRS will have the ability to prevent the developer moving to the next stage. As well as the gateways the design and build stage requires the nomination of duty holders, to make it clear where responsibility lie. In addition, the developer will have to provide documentation regarding the build, materials and design of the premises which will be available for all to see, this is known as the Golden Thread.

Following occupation and for all existing Cat 1 and 2 premises an annual Fire Risk Assessment (FRA) will be required. This FRA should be carried out by a suitably qualified professional. All Cat 1 and 2 premises will also be required to identify the Accountable Person. The Accountable Person will have legal responsibility for the safety of the whole building, for residential purposes. As fires in Cat 1 buildings will have a greater impact, they will require a higher standard of fire safety. This standard will involve the creation of the role of a Building Safety Manager and the production of a document called the safety case. The White Paper also recognises the importance of engagement with the residents of a premises. It also proposes that regulators will need to go beyond the front door of premises to ensure the building is safe from fire.

The White Paper also discusses some of the potential regulatory regimes. The document gives a number of options based on local, regional or national structures and involving the current regulators (FRS, Building Control and Housing Enforcement) or the creation of a new single regulatory body, as has been created in England. The White Paper does not give a preferred

preference as to how these bodies would interact with each other. It does however, recognise the importance of FRS in ensuring the regulation of fire safety.

### Key Considerations for NWFRS

- High numbers of Cat 2 premises we do not currently inspect.  
We have not been able to quantify the additional number of premises that will fall into Cat 2. It is reasonable to expect that the numbers will be in excess of 2000 (estimate). As we currently have the capacity to complete 1000 audits per year it is clear that the inclusion of Cat 2 premises in our inspection regime will have an impact on our inspection programme. Either current high risk premises, inspected under the Regulatory Reform Order, will be inspected less regularly or more staff will need to be employed. If more staff are employed we will be able to ensure the continued safety of existing High Risk Premises and the additional Residential Premises requiring regulating, following the adoption of the Safer Buildings proposals.
- Increased workload due to changes in the design and build phases.  
The changes proposed in the design and building of Cat 1 premises will require us to engage for longer with the build process. FRS skills will be required at all 3 gateways to ensure compliance with fire safety legislation and building regulations. Staff will be required to support and comment on changes to design and materials throughout the design and build process.
- Greater administrative burdens to comply with all the requirements of the new legislation.  
We are already expecting an increase in workload brought about due to changes in the planning process making us statutory consultees. Clearly changes to the Building Control process, the instigation of the Golden Thread and increased regulatory requirements will all require administering and sharing in an appropriate format.
- Unknown workload relating to residents engagement.  
The requirements for Residents and The Accountable Person to understand their duties and challenge decisions and behaviours will have a direct impact on both Business and Community Safety. The Accountable Person has a requirement to ensure fire protection within all parts of their premises. One way of discharging this duty is to use Community Safety personnel to ensure Residents are aware of fire risk in the

home and have received advice to reduce that risk. Residents will be engaging with Business Fire Safety personnel to ensure that the Accountable Person has recognised all the risk and mitigated them in a suitable manner.

Both of these examples will lead to a greater workload for ourselves.

- The organisation of the Regulatory bodies  
The White Paper does not have a preference regarding future regulation but instead suggest a number of possible scenarios. Our preference would be to continue with separate regulators. These Regulators will need to ensure greater cooperation and agree areas of responsibility.  
The White Paper also proposes greater scrutiny beyond the front door of peoples flats. Both the legislation and Regulators will need to clarify who and how this is to be achieved.
- In the relationship between new and existing legislation.  
The White Paper proposes changes to legislation relating to residential premises. The White Paper recognises the current legislative environment but does not examine the opportunities to improve this legislation.
- Additional skills and experience required to audit and advise on new regime.  
The White Paper references both the Hackitt Report and The Building Safety Expert Group (BSEG) as important pieces of work in setting the reference points for the White Paper to address. Both Hackitt and the BSEG state that competency of all individuals involved in the build, design, regulation and management of residential premises must be ensured. All industries involved in the build, design, regulation and management of residential premises have worked with Dame Hackitt to produce an agreed Competency Framework. Whilst the White Paper recognises the importance of competency in certain aspects of the legislation, it does not deal with it as a separate heading. This will result in confusion as to what competency looks like in Wales.
- Maintaining existing staff in a market were their skills will be in demand.  
If the proposal in the White Paper are adopted it is foreseeable that many areas will suffer a skills shortage. In Fire Safety this could lead to members of staff being offered better wages and conditions of service, leading to trained and experienced staff potential leaving the Service.

## Conclusion

North Wales Fire and Rescue Service recognise the White Paper as a significant step forward in fire safety, in residential buildings. We will work with Welsh Government to ensure the legislation provides the guidance and protection that residents of high risk residential premises deserve. The White Paper sets out a clear route to achieve this and whilst we have set out a number of issues that require further clarity, we endorse the aims and outcomes with in the White Paper.

## **NHBC on the ‘Safer Buildings in Wales’ White Paper**

- NHBC supports many elements of the White Paper which we believe will deliver most of the Welsh Government’s stated objectives. However, we are concerned that the paper goes beyond the recommendations of the Hackitt review and does little to recognise the expertise and competence of the Approved Inspector (AI) system.
- The paper does not contain sufficient detail to assess whether buildings will be safer. For example, while Welsh Ministers will determine operational standards for both Local Authority Building Control (LABC) and AIs, it is not yet clear how the key aims of the regulator – oversight, collaboration and compliance, will be delivered to provide independence, governance and impartiality for building control and ultimately residents.
- NHBC is concerned that reforms to building control could result in homes being less safe for homeowners, not more. We are also uncertain about the future direction of travel by the Welsh Government in only allowing LABC to be the building control provider on Category 1 buildings. These proposals do not rely on proven competency and create uncertainty for the broader AI market with the potential to diminish overall building control capacity in Wales.
- This decision appears to completely rule out the involvement of AIs in the process for Category 1 buildings, despite AIs having the necessary capacity, skills and competence to work on these buildings. The new regulatory system must allow for the best possible organisation to deliver building control, regardless of whether they are LABC or AI.
- The proposals in the paper need to accurately reflect the resources and expertise of the Welsh local authorities to deliver building control for Category 1 buildings, and importantly, if they have the relevant competences for this. In the circumstances where a neighbouring LABC will be required to deliver building control for an LA development, it is wrongly assumed the neighbouring LABC will automatically have the required competence and expertise to deal with Category 1 buildings.
- An Auditor General report in 2019 found that net expenditure by local authorities on building control had fallen by 43% between 2008-09 and 2017-18<sup>1</sup>. Excluding AIs as suggested by the White Paper will pose a serious risk of stretching these resources further.
- It is vital that the decades of expertise and capacity that AIs offer, particularly in specialist areas like High Risk Buildings, is utilised or higher-risk buildings could be less safe. Unlike LABC, AIs are independently licensed and regulated by CICAIR, who are appointed by Welsh Ministers. CICAIR maintains an AI register and Code of Conduct, investigates complaints made against AIs, impose sanctions, and audits AIs against CICAIR and industry professional standards.

<sup>1</sup> <https://www.audit.wales/sites/default/files-old/publications/planning-services-2019-summary-report-english.pdf>

- As an Approved Inspector, NHBC has the capacity and competence in Wales to provide building control for Category 1 buildings. In addition to this, we have a multi-disciplinary Major Projects department of building control surveyors, inspectors, fire engineers, structural engineers and façade specialists, all of whom deal specifically with buildings above 18m on a daily basis. Current experience of High Rise/ high risk buildings is a key part to demonstrating ongoing competency.
- The White Paper should also have explicitly restricted LABC from exercising a building control function on any local authority building. Despite the paper explaining that a neighbouring local authority will fulfil the building control function in their own area, this remains a conflict of interest.
- In order to ensure accountability and oversight, we believe that the White Paper should create a single approval and regulatory organisation to oversee all Building Control Bodies, with all Building Control Professionals (LABC and AIs) working to a single unified competence framework and for this to include a register of individuals and new registration requirements for AIs.
- A separate independent body would ensure there is the correct level of scrutiny, accountability, consistency and common standards for all building control professionals.
- It is important that the timescales of reforms to building control are published to ensure that the industry has enough time to prepare and implement the necessary changes. Further to this, competency requirements should align with the British Standards being developed, this will ensure that dutyholders building across geographical boundaries have the same standards applied and the same level of protection is afforded to all consumers.

**February 2021**

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## About NHBC

- NHBC is the leading warranty and insurance provider for new homes in the UK. Our core purpose is to give homeowners confidence in the construction quality of new homes. NHBC sets standards and conducts inspections onsite.
- Our ten-year Buildmark warranty covers around 70%-80% of new homes built in the UK, currently protecting around 1.5 million homes.
- We are a non-profit distributing organisation, with no shareholders, authorised by the PRA and regulated by the PRA and the FCA.
- NHBC Building Control Services is the largest Approved Inspector in England and Wales and the UK's largest single Building Control Body with more than 30 years' experience delivering technical advice and a high-quality service. In addition to this we have locally based Surveyors and Building Inspectors in Wales.
- NHBC Building Control Services undertake Building Control on residential, commercial and mixed-use developments, and which is licensed and regulated by the Construction Industry Council Approved Inspectors Register (CICAIR).
- We do not build or sell homes; NHBC is not a regulator and does not represent any part of the industry. Individual builders are ultimately responsible for the quality of the homes they build and sell to consumers.



Papur 5

Paper 5

## **Local Authority Building Control Wales (LABC Cymru) Priorities Following the Publication of the White Paper on the Building Safety Regime**

This is no doubt the most extensive Building Safety reform ever in the United Kingdom and a reform that is welcomed by Building Control professionals in Wales.

These measures will serve to reinforce a system of control with clearly identified lines of responsibility throughout the lifecycle of buildings in scope.

The emphasis here is of course on building safety and safety of residents. However, I am sure these measures will also serve to inspire confidence in the industry and in a system that will be fit for purpose. It will also offer a degree of certainty, which will ensure that a tragedy like that which occurred at the Grenfell Tower will never be witnessed again.

This note focuses on the interests of Building Control but it is pleasing to see a role for planning colleagues at gateway 1 with stricter controls and lines of responsibility at gateway 3 for Housing colleagues and of course empowerment of residents who will be occupying these buildings.

Priority for LABC Cymru will of course be delivering what is expected of us from the reform. I am confident that we are in a strong position to do that. We have the necessary skills and competencies along with quality assured systems of control. LABC has been instrumental since Grenfell in establishing a mechanism to achieve high-level competence verification and ISO accredited quality managed back office systems.

What is key to achieving this priority is maintaining, developing and expanding our available staffing resource. I do not think anyone can hide the fact that Building Control officers are an endangered species with the profession suffering from years of austerity.

It is essential that we stop the haemorrhaging of skills and experience to ensure that new talent is introduced and grown to plug that loss.

It is clear that Welsh Authorities have suffered in recent years in being able to recruit and train new officers due to the lack of funding and support.

In view of the above LABC Cymru see the following as a priority and in particular would like to explore how the Welsh government could assist in investing in building control recruitment, training and competence, focussing on:

- More new trainees – there are almost 40% more senior surveyors aged 56+ at risk of retirement from the profession than there are trainees coming in at the bottom.
- More lower risk surveyors need to be trained / gain experience in complex buildings.
- More validated fire surveyors – particularly in South Wales

- Developing a clear career path from trainee to junior and onwards.  
Also as a priority, we need to understand more about Welsh government proposals for public sector apprenticeship schemes, recently referenced by the Minister in a Senedd statement on 19 January.

Buildings in occupation; there is a suggested new role for Building Control there. This role may bring additional resourcing issues, which will need to be considered in order to deliver the Welsh Government's agenda.

The establishment of the Joint Inspection Team – what is the implementation plan and how are the multi-agencies going to be resourced?

From an LABC Cymru perspective, we will prioritise the enhancement of our cross boundary working relationships and our regional working agenda, which will serve to provide the necessary expert skills and qualified staff, to provide coverage and support to any Authority that may not have those officers within their establishment.

This reform presents many challenges; LABC Cymru welcomes these proposals and is looking forward to working with Welsh Government to develop a regime that will secure the health, welfare and life safety of residents across Wales, of High Rise Residential Buildings and other like risk premises.

12<sup>th</sup> February 2021

Briefing

# RICS response to the Building Safety Regime White Paper

Committee briefing for the Senedd Cymru Equality, Local Government and Communities  
Committee

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*For and on behalf of the Royal Institution of Chartered Surveyors (RICS)*



# Introduction

As a globally recognised professional body, with over 1800 members in Wales, everything the Royal Institution of Chartered Surveyors (RICS) does is designed to effect positive change in the built and natural environments. RICS is one of the largest and most respected organisations globally for advising on building safety matters.

Through our respected global standards, leading professional progression and our trusted data and insight, we promote and enforce the highest professional standards in the development and management of land, real estate, construction, and infrastructure.

RICS has been a force for positive change in recent years when it comes to building safety, particularly concerning fire safety. We continue to work with governments to address the challenges of combustible cladding, are training and upskilling professionals in fire safety and recently spearheaded a global coalition of experts to develop the UN-supported International Fire Safety Standard.

## About the author

I work in Building Control and for 44 years (38 in Wales) I have worked in 6 different Building Control Bodies - 2 Local Authorities in Wales, 2 in England and 2 Approved Inspectors. With the Approved Inspectors I have worked on projects mainly in Wales but also across the UK. I managed a team of 14 BCO's in Cardiff and was the Building Control Officer on the Senedd building.

I have been involved with Welsh Government on BRAC Wales and was instrumental in developing the Sprinkler Regulations. I have worked with MHCLG/DCLG, Cabinet Office and the RICS in developing legislation and guidance. I am a lecturer and provider of CPD in Building Legislation and Guidance and have worked with the RICS, RIBA, Cardiff University School of Architecture, and many other organisations. I am a member of the RICS and the Institute of Fire Engineers.

## General comments

Clearly, Wales has a strong agenda of safety as proved with the introduction of sprinklers in housing standards. This ground-breaking law is a major step to saving lives. While the outcomes of the Grenfell Tower Inquiry are the catalyst for further change, the response must not be limited to the outcome of the Hackitt report and we welcome the positive and enhanced approach to fire safety that WG is proposing.

While the scale of the problem is different to England, Wales only having 150 residential buildings over 18m is still placing many thousands of people at risk. Every flat occupier deserves safety and your commendable tenant involvement strategy will demand answers to the policies if they are wanting in any way.

The title and role of the Building Safety regime need to be clearly defined and justified. Is it only dealing with fire? The Building Regulations deal with many other aspects of safety. The system needs clarity and clear references / empowering guides and legislation. If the brief is safer buildings – this is a very wide remit.

### Scope of the regime

This enhanced approach to fire safety should apply to other buildings. As the Building Inspector for the Senedd, I spent many hours dealing with the very high fire safety standards. When I approved the plans and issued the Certification, fire safety was one of my prime considerations.

I also was the safety officer of Cardiff Arms Park and my team approved the Fire Safety Strategy of the then Millennium Stadium with the safety of 74,500 people at stake. Perhaps the Building Safety Regime should have some involvement in commercial buildings with more than 5 staff (this is the criteria under the RRO (Regulatory Reform (Fire Safety) Order 2005) for having a written Fire Risk Assessment.

The system could be tiered and developed to match the risk, but we are sure that schools, hospitals, pubs, shops etc, which could have thousands of occupants, deserve this level of safety.

Many members within the RICS are challenging the use of the 18m height value (your Category 1 proviso). It derives from the Hackitt report which was only initially considering the single Grenfell event and is not evidenced in any way as to why it should be different above and

below this figure. We have concerns with this principle as it ignores the key element of risk. While the defining Category 1 buildings mirror England it is evident that it is a much bigger problem and includes many other buildings. It is commendable that Wales is proposing a wider brief and we concur entirely with the two or more dwellings criteria. We would, however, question the Category 1 criteria as it is too narrow. I approved a 4-storey care home with 200 occupants in Cardiff – this has far more fire safety issues than a simple 18m high block of flats and yet would fall outside the higher standard of this regime.

The further breakdown of 2 or 3 tiers of building risk is complex as it requires a clear and consistent assessment of that risk. You propose Low/Medium/High and we would recommend that this is formally decided. It should have strict, defined criteria with possibly each building designated a category by a regulator bearing in mind the complexity, risk, height, occupancy and building age at the very minimum. It should not be allowed to be the owners/designers to decide on this.

The development of a lifetime management programme is a vital and correct sentiment but is our biggest challenge. Building management and maintenance is notoriously unreliable, sometimes unavailable and difficult to ensure long term. This alone will require a culture change - for instance your commendable laws to mandate sprinklers – maintenance and occupier involvement is crucial and maybe something needing penalties and severe consequences if it is to be relied upon. The four parties BCO/Fire officer/Housing officer will need to work together with the owner and BSM/AP/RP stakeholders to deliver this.

## Information

While newer buildings will have a head start in compliance and information, older buildings will need a review, creation of information and analysis of current position and remedial measures to bring it up to a safe standard. This is a vast amount of work with limited resources of both competent persons and finance. The information will also need to be located in a reliable (and we would suggest publicly accessible) place. It will be a vital and key reference for regulators, managers, tenants, and auditors. It must be said that in very large projects the collation of documents and information is often months after occupation. We agree with the Stop notices/stages as this will force the compliance and information process.

## Staff

I would recommend that the WG opts for the single regulator approach using the current Local Authorities and Fire Services. The HSE / English system proposed is another tier of complexity, having a narrow brief and is confusing for the industry. The English system will require an appreciable number of additional officers to deliver and manage.

The pool of available competent persons is limited. Building Control staffing levels are in crisis – there are no courses in Wales to get qualified (BCO's in South Wales have to go to Bristol & elsewhere to get qualified), most staff are over 50 and there is a severe shortfall. To siphon off what would need to be very experienced and expert officers out of the mainstream Building Control teams would be catastrophic (this is a major fault of the English system).

## Building Control / Fire Officer competency

I would recommend you audit the 22 LA's and the 3 fire services to understand what WG and the Regulators can deliver. A formal register is required to manage competency and this will allow the correct function of the checking process. Creating a new regime will rely on the resources you already have. Linked to this is, of course, training. Bearing in mind the resourcing problem of competent people in the existing and new roles, training will be a key issue.

## New roles

The delivery of the new roles of AP/BSM along with the existing (but often lacking) Responsible Person under the RRO is essential. These roles, however, are complex, responsible and onerous. They will require competency, remuneration, likely PI insurance cover, and a capacity to be able to do each of these challenging roles.

## Gateway 1

The link for fire consultation at Planning stage is not straightforward. Planning officers are unable to check Building Regulations. The consultation process also appears to only propose a Building Regulation check of limited fire safety matters dealing with Fire Brigade access/facilities such as water or firefighting stairs. This would not check the wider fire safety matters in Regulations B1 – 4 which covers means of escape, fire resistance, compartmentation, fire doors, cladding etc.

As a practicing BCO, we often get passed planning applications which do not comply with many of the fire regulations. The building regulation application is often months, sometimes years after the Planning application. In the majority of cases, the design and details of the fire safety issues have not been resolved or sometimes even considered as the only brief is to sort out the appearance of the building to comply with Planning policy.

The bigger the scheme, the more of a challenge this is. There is also the complexity of 'Design and Build' meaning the general appearance and concept is approved under Planning then passed to the Contractor/Developer to complete the detail design including all fire safety matters. This only happening after Planning is to ensure the certainty of the project. To fix this element is therefore a further culture change in the design process. We would recommend that the whole requirement of fire safety is considered at the Planning stage by consulting the regulator.

## Gateway 2

We agree that all the information must be available before work commences on site. Currently, especially on larger schemes, this is not the case.

## Gateway 3

The occupation gateway appears to be building control sign off. This is completely for the Building Control role. It has no current requirement or function in controlling occupation. There are no mechanisms to prevent occupation.

There is also the common problem of part sign off to allow some parts to be occupied and work on an existing building where the building is still in use. It would however be a great asset to make this a controlling factor and formally prevent building use until all safety measures are in place.



## Building Regulation changes

The main changes so far have been to prevent combustible cladding. This is not the only problem. The Stay-Put design philosophy is flawed - poor compartmentation, fire doors, fire resistance, openings on an elevation, fire alarms, ventilation of stairs and some other issues have been exposed by the Grenfell evidence as needing review and improvements.

While the Grenfell inquiry is not proposed to finish until 2023, we evidently cannot wait that long. We would recommend a review by your Building Safety Expert Group to resolve these necessary changes before a system with flawed guidance is created. It would be prudent and beneficial to have the standard set at the start of the regime and have minimal changes ongoing.

## Proposed enhanced approaches

We agree with the promotion of Fire detection & alarm systems and compartmentation awareness as a key factor. It should be a part of a general education/awareness/policy of considering how fire safety works.

## Building Safety Expert Group

They should identify the Regulation changes and the Building Categories – develop the roles and competencies and be a proactive driving force for updating, correcting and creating new guidance and laws to make buildings safe. It should have a role more proactive than the current Building Regulations Advisory Committee to interpret, propose and champion improved regulations.

## Fire Officers

The three fire services in Wales have fire safety teams. These deal with the administration of consultations and generally are office-based. They have additional training but in recent years there has been a loss of the more experienced officers and teams have become smaller.

Over 35 years ago they used to outline on the plans what fire safety matters they required but today and since 1985 they are only advised on what the Building Inspector is about to approve. There is technically no need for “agreement” or debate on what is necessary to comply with the

Building Regulations – this is the role of the BCO. This is more a process to advise the Fire Service on what they need to commence the RRO obligations when the building is occupied.

The Fire Officers should not get involved with compartmentation, alarms, fire escape design, fire doors etc. If WG proposes an enhanced role for them to be more involved in the design process it will require system change, more resources, training and improved competency.

Change is slow in legislation. It is over three years since Grenfell and we think all would agree that progress is poor. To respond now, we would firstly develop, reinforce and enhance the Regulatory Reform Order process.

This legislation is already in place and should already be happening. It is a serious shortfall of the existing system and building stock. It could be relatively easy to have a register, Responsible Person, and check to see if risk assessments and inspections have been carried out. It could be enhanced by monitoring by Building Safety Expert Team (Building Control/Fire Engineer or Fire Officer).

It should be audited, publicised and made a public record for the tenant involvement and awareness of the key safety matters in every in-scope building. This is a relatively short term and achievable goal which will prove the state of the extent of the issues and hopefully result in improved fire safety.



**Question one - do you agree that the building safety regime in Wales should apply to all multi occupied residential buildings with two or more dwellings?**

No: Many smaller blocks of flats are owned by the flat owners who have a share in the freehold. Such blocks are managed by management companies controlled by the same shareholders. The management of other leasehold blocks falls to Residents Management Companies [RMCs] or Right to Manage Companies [RTMs]. Management companies are usually run by volunteer leaseholder directors. It is hard to get leaseholders to volunteer to manage their own blocks of flats.

Requiring duties and responsibilities under the Building Safety Bill in addition to the Fire Safety Order, which we understand will not be disapplied, adds to the regulatory burden and risk for those volunteer directors. This will make it harder to get leaseholders to volunteer as Directors. Where the management becomes too difficult or risky for law directors to deal with they will need to engage Managing Agents, increasing the cost of management to leaseholders. This is entirely appropriate, where the risk demands it, however having two pieces of legislation effectively managing the same thing appears to be over regulation.

Any extension of scope should, in our view, be dependent on the risk. Risk will be affected by the complexity, size, occupation or fabrication. This could be a second category covering building 11 to 18m or description of risk factors that would bring a building into scope two.

**Question two do you agree that there should be 2 risk categories for the building safety regime?**

Yes. A second category covering building 11 to 18m would appear to be appropriate

**Question three do you agree with the proposed scope of category one buildings?**

Yes

**Question 4 to agree with the proposed scope of category two buildings?**

No: For the reason explained above, the scope of Category 2 is not justified by the risk. Any extension of scope should, in our view, be dependent on the risk. Risk will be affected by the complexity, size, occupation or fabrication. This could be a second category covering building 11 to 18m or description of risk factors that would bring a building into scope two.

**Question 5 do you agree that licence HMO's should be included within the scope of the building safety regime?**

No. HMO's are subject to a separate regulatory regime. It is inappropriate to have two pieces of legislation addressing effectively the same risks.



**Question 6 do you agree with the exemption set out in figure 6? Are there any other categories of building that should be included within the scope of the regime during occupation?**

Although the buildings out of scope in figure 6 are covered by the Fire Safety Order, the proposed enhanced construction regime, set out in this consultation document, will not apply to category one buildings of the types listed. Arguably care homes and hospitals should be subject to the proposed construction gateways irrespective of height.

**Question 7 do you think that any extra measures should be taken as regards single flats above high-risk premises like restaurants and takeaways?**

No. Risks can adequately be addressed within the Fire Safety Order.

**Question 8 Do you have any other comments on the issues we have raised in this section?**

No

**Question 9 do you agree that a consistent approach with England to the information set out in the Golden thread and key data set is appropriate?**

Yes, it is entirely appropriate. It is common for dutyholders and property professionals to work both in England and in Wales. The need to understand two requirements would inevitably lead to confusion and incorrect implementation.

**Question 10 do you agree that is appropriate for all buildings within scope of the building safety regime to provide information in relation to the key data set?**

Yes: However, whilst we understand the benefit of such information to Regulators, we do not see how such limited information, particularly in relation to the information required for Category 2 buildings, will be useful to residents or indeed to dutyholders. It is unclear why the general public would require such information. If the information is required to provide information to prospective purchasers more information is clearly required. Such information could be provided by an LPE01. This would be an appropriate place to provide the information.

**Question 11 do you agree that the broad duties set out are appropriate?**

No. No duties appear to be imposed upon Designers or Contractors. Neither a Principal Designer or Principal Contractor can discharge their duties if other designers or contractors do not comply with their own duties and co-operate with them and each other.

**Question 12 are there any additional duties we should include?**

Designers need to ensure that any design that they prepare complies with the Building Regulations.

Contractors need to ensure that any work that they do complies with the Building Regulations.

A person with a duty or function must cooperate with any other person working on or in relation to the project, to the extent necessary to enable any person with a duty or function to fulfil that duty or function.

All duty holders appointed to work on a project must have the skills, knowledge and experience, and, if they are an organisation, the organisational capability, necessary to fulfil the role that they are appointed to undertake, in a manner that ensure compliance with the Building Regulations . A person who is responsible for appointing a designer or contractor to carry out work on a project must take reasonable steps to satisfy themselves that the designer or contractor fulfils these conditions.

A person working on a project under the control of another must report to that person anything they are aware of in relation to the project which is likely to lead to a situation where the Building Regulations will not be complied with.

A designer must take all reasonable steps to provide, with the design, sufficient information about the design, construction or maintenance, to adequately assist the Accountable Person, other designers and contractors to comply with their duties.

All duty holders must provide any information required to compile the golden thread.

**Question 13 do you agree that there should be a named individual identified where the dutyholder is a legal entity?**

No. With risk must come authority. If the law requires an individual to be named, they must be given the legal authority to act and other directors must be required by law to cooperate.

The more onerous that you make a duty the more likely it is that it will attract only those that are tolerant to risk.

There is also an issue in regard to professional indemnity insurance for such individuals. If the PII chooses to provide cover for such individuals, the cost is likely to be prohibitive.

If it is to be a named individual it is likely to be the director of the Management Company [RMC or RTM} who did not resign in time.

Although many leases only allow leaseholders to be directors of the property's Management Company an inferred clause in all leases permitting the appointment of professional directors would allow such appointments and ensure that those with duties had the skills, knowledge, experience and behaviours to undertake them.



**Question 14** how effective are the existing arrangements for local authorities and Fire and Rescue authorities to consider issues of availability of water during the preparation of local development plans?

No response

**Question 15** should fire and rescue authorities become “specific consultation bodies” as defined by the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005?

No response

**Question 16** To what extent do you agree with the proposed content to the fire statement?

Strongly agree

**Q 17** do you agree responsibility for the content of the fire statement should rest with the dutyholder?

Yes. Or where one is appointed the Principal Designer.

**Question 18** do you agree that gateway two should be a hard stop point where construction cannot begin without permission to proceed?

Yes

**Question 19** should the local authority building control body have discretion to allow a staged approval approach?

No response

**Question 20** what is an appropriate time scale for the local authority building control to respond to gateway two applications?

No response

**Question 21** Should the local authority building control be allowed to extend these time scales?

No response

**Question 22** do you agree that the principal contractor should be required to consult the client and the principal designer on changes to plans?

Yes. It is essential that they do so given that both parties duties continue during the construction phase. A written record of such consultations should be maintained and captured in the golden thread.



**Question 23 do you agree the principal contractor should be required to notify the local authority building control of any proposed major changes before carrying out the works?**

No. Duties in relation to design compliance should remain with the Principal Designer who should notify the LABC of changes and obtain approval. The Principal Contractor must have a duty to notify the Principal Designer where they wish to make a change and the also a duty not to deviate from an approved design without approval of the Principal Designer.

**Question 24 do you agree that where major changes are made to the approved plans there should be a hard stop and work should not proceed until the revised plans had been approved by the local authority?**

Yes for the reasons explained above.

**Question 25 what is an appropriate time scale for local authority building control to respond to major changes?**

No response

**Question 26 do you agree that for a new category one building an accountable person must be registered before occupation of the building can begin?**

Where the building is to be managed by a resident's management company [RMC] made up of leaseholders (RMC or RTM) the Landlords intention to have an RMC is specified in the lease before any units are sold. The RMC comes into existence before the first lease is sold and is at this stage run by professionals appointed by the Landlord. The control however changes from professional directors to leaseholder directors within the a timescale determined by the Landlord. We agree that an accountable person need to be registered. Accountability should be retained by the Landlord until such time as the building is fit to handover however at this point the Accountable Person could be either the Lanlord or where already in place the RMC. As noted above the board of the RMC will often change from professionals to leaseholders, usually after all leases are sold. At this point those in control of the RMC will be wholly different.

**Question 27 do you agree that a final declaration should be produced by the principal contractor with the principal designer to confirm that the building complies with building regulations?**

No. Whilst it is possible for a Principal Designer to design a compliant building and a Principal Contractor to construct the building in accordance with the compliant design it is difficult if not impossible to make declarations in relation to each other's work. A Principal Designer could make a declaration of conformity at Gateway 2 and confirm that any changes that they have been notified of have been approved. They cannot be expected to inspect the Principal Contractors work to ensure that it is compliant. A Principal Contractor should not be expected to confirm a design is compliant only that they built to the design and did not deviate from it without approval.



We understand in Ireland that the Architect is responsible for signing to confirm compliance with the Building Regulations. On more complex projects he is able to include sub-opinions in his overall compliance statement on compliance from, for example, structural engineers, fire engineers and mechanical and electrical services consultants. This model would appear to be appropriate and allow the responsibility for sign off to be shared with those with the necessary skills, knowledge, experience and behaviours to make such a statement.

**Question 28 should local authority building control be required to respond to gateway three submissions when within a particular time scale?**

No response

**Question 29 are there any circumstances where we might need to prescribe local authority building controls ability to extend these time scales?**

No response

**Question 30 do you agree that the client during gateway 2 (if not continuing into the role of accountable person) must hand over the building safety information about the final as built building to the Accountable Person before occupation is permitted?**

Yes. It is essential that they do so. An accountable person and any appointed building safety manager will not be able to manage your building in accordance with the proposed legislation without the building safety information. A situation where information is not provided at handover and must be obtained by survey and paid for by leaseholders, as it is in many cases currently, cannot be allowed to continue in the future.

It is crucial that this point is understood by Principal Contractors and other duty holders and that a consequence should exist for failing to provide the correct level of building intelligence.

**Question 31 do you agree it is appropriate to allow staged occupation where previously agreed during gateway 2 e.g. a mixed development?**

Yes. Where the Client and Accountable Person BOTH agree that it is safe to do so.

**Question 32 do you agree that category one buildings undergoing major refurbishment should also be subject to the gateway approach?**

Yes. It is essential that all changes that may affect compliance with the Building Regulations go through a compliance process. Major works should in addition be subject to the gateway approach.

**Question 33 are there any other types of residential building or characteristics of a residential building that should require it to go through the gateway process?**

As noted in Question 6 we believe care homes and hospitals should be subject to the proposed construction gateways?





**Question 34 we will be undertaking further consultation in this area when we set out regulations. Would you be interested in being added to our stakeholder list in relation to the design and construction phase?**

Yes please add us to your stakeholder list in relation to the design and construction phase.

**Question 35 do you agree that there should be a single and clearly identifiable accountable person for all premises covered by the building safety regime?**

Yes there should be a single and clearly identifiable accountable person.

**Question 36 do you agree with the proposed approach in identifying the accountable person?**

No. In a leasehold property the lease will dictate who has responsibility for the management of various parts of the building and how they can recover costs for doing so.

The lease sets out exactly what the leaseholder has bought, what is exclusively theirs and what is shared; what services the landlord must deliver and what proportion the leaseholder must pay.

The various parties in a leasehold block of flats are explained in

<https://arma.org.uk/downloader/tvv/Who is Who in a block of Leasehold flats.pdf>

A freeholder may issue a lease to a Landlord giving them permission to construct a building. The only conditions on the lease could be to pay for the lease and return the land to the freeholder at the end of the lease.

A landlord (who may or may not be the freeholder) can issue leases to various residential leaseholders or to another sub-landlord who issues leases to various residential leaseholders. Either Landlord can assign full or partial maintenance responsibility to a maintenance trustee. In some leases the landlords only right is to remove and replace that maintenance trustee with another body that is not them.

The maintenance trustee can be a Residents Management Company, a Right to Manage Company or another company named in the lease.

The maintenance trustee can be responsible for the maintenance of the whole building or only part of the building. (They could be considered to be the 'the person/entity that is performing the property management function' See paragraph 7.12.3 and answer to Q63.)

A Landlord may, particularly in a mixed use property, retain responsibility for the structure, roof and external walls [Retained Parts]. The lease will indicate how he can recover cost for any maintenance or compliance work. The landlord would in such circumstances charge the management company or perhaps commercial leaseholders for the work. The maintenance trustee would recover costs from residential leaseholders through the service charge.

Unless the law allows a freeholder or landlord authority to act the leasehold arrangement may prevent them from acting. If the law does permit them to act, they must also have the ability to recover the costs of acting.

In a building with Retained Parts there will necessarily be two Accountable Person. If the law requires only one and they are allowed to agree for one to be the only Accountable Person



there must be a mechanism to overcome and rights and responsibilities within the lease in relation to the arrangement.

A default to the Freeholder or even the Superior Landlord provides an opportunity for those Landlords and Management Companies who do not want to take on the role to pass the responsibility up to the line to an organisation that may have little or no ability or competence to discharge their duties.

In a building with a residents management company or right to management company it is likely that the Accountable Person will be the management company. The shareholders or members of that company are the residents. [https://arma.org.uk/downloader/f1s/2014-07\\_ARMA\\_Advice\\_Note - Lessees and RMCs V01.pdf](https://arma.org.uk/downloader/f1s/2014-07_ARMA_Advice_Note_-_Lessees_and_RMCs_V01.pdf) . In such circumstances to move the responsibility away from the management company risks disenfranchising those that the bill is intended to protect: the residents.

**Question 37 are there specific examples of building ownership and management arrangements where it might be difficult to apply the concept of an accountable person?**

Potentially where enfranchisement has occurred and a Right to Manage Company has been formed or where the RMC is a named manager it will be difficult to apply the concept of an accountable person. RMC directors can be short-lived and potentially, at time, not qualified or sufficiently knowledgeable to act. The accountable person cannot discharge their duties although they should clearly understand their obligation to instruct appropriately qualified experts. A well written management agreement with a Managing Agent and/or Building Safety Manager would assist this process but not absolve the AP of their obligations.

Measured capability and/or a level of business acumen should be specified as required qualifications for an accountable person based on the associated risks of a serious incident.

The ability to appoint professional directors on Management Companies as discussed earlier would help.

There is also a potential problem in common hold <https://www.lease-advice.org/advice-guide/commonhold/> . In common hold parts of the building that are not demised to the flat owners (referred to as unit-holders) are owned and managed jointly by the flat owners through a commonhold association.



**Question 38 do you agree that the default position should be that the accountable person is a freeholder?**

No for the reasons explained in Question 36 and 37

**Question 39 for mixed use buildings there will be a responsible person under the FSO for the business premises and an accountable person under the building safety regime for the residential parts. Are there any requirements we should consider about how these responsibilities responsible party should work together to support and ensure fast safety of the whole building?**

FSO or Building Safety must require that where a fire safety or structural risk exists that could affect the safety of a building or part of a building to which the Building Safety Bill applies that the relevant Responsible Person take such action as is necessary to reduce the risk to an acceptable level. An acceptable level would be one where the safety case for the in scope building is accepted by the regulator.

If such a requirement is enacted it is unclear how the Responsible Person recovers costs for action that is only required to ensure the safety of residents of another building who are arguable not 'relevant persons'.

Mandating an overarching agent to deal with both commercial and residential, which is a relatively common practice in such situations, would appear to be the answer.

**Question 40 do you agree with the proposed duties of the building safety manager for category one buildings?**

No. The role is described as a Building Safety Manager. There must therefore be an assumption therefore that the BSM manage the process and others to ensure that the Accountable Persons relevant duties and responsibilities are undertaken. By necessity many people and organisations will be involved in the tasks described in paragraph 7.3.3 however the duty appears to require either the Accountable Person or the Building Safety Manager to 'carry out the duties' rather than ensure that these duties are carried out.

Where there is a Managing Agent in place who does not have the organisational capability or skills knowledge and experience to act as a licenced Building Safety Manager, the Accountable Person will need to engage a licenced BSM to 'carry out' the described duties and a Managing Agents to discharge all other relevant duties including those duties under the FSO, which we understand, will still apply.

It is noted that there is no requirement for the Accountable Person to be competent if they choose to undertake the role themselves which cannot be in the interest of the residents this bill is designed to protect.



We strongly believe that there should be a scheme for accrediting non specialist contractors such as decorators and cable contractors whose work can affect the safety of buildings. To require a BSM to accredit each contractor and to verify their work has not affected the safety case each time they visit will be expensive and difficult to achieve. ARMA are working with WG8 and the soon to be inaugurated Building Safety Alliance with a view to develop such a scheme and would be keen to work with the Welsh Government addressing the significant and important issue.

**Question 41 do you agree with the proposed division of roles and responsibilities between the accountable person of the building safety manager?**

It is correct that the Accountable Person is accountable however not appropriate for a Duty Holder such as the BSM to have no legal responsibilities.

**Question 42 is the relationship between the accountable person and the building safety manager sufficiently clear?**

The term 'take their instructions from' confuses the relationship. The Building Safety Manager is legally required to be competent. They are the ones that know what needs to be done. They necessarily cannot act without authority from the Accountable Person, however must be the one that identifies what needs to be done and when. The term take instruction from suggest that the Accountable Person decides what is done and when, which, if the case, would suggest that they don't need a BSM.

**Question 43 Do you agree that the proposed duties and functions set out in Figure 8 for accountable persons for category one buildings are appropriate?**

Create maintain and update the Golden thread for the building is included only under during occupation create the information must also be included in the during design and construction section for new buildings.

Table 8 suggests the accountable person must ensure there are sufficient funds available to this person in order for them to effectively undertake these roles and responsibilities on behalf of the accountable person. In this whole buildings the lease determines how and when funds can be obtained. Money cannot be spent that has not been collected. Unless legally mandated in the building safety bill a dutyholder can only obtained funds where the lease permits them to do so. A freeholder may have given 1000 year lease the landlord to build a property on a piece of land. It is not reasonable to expect them to pay for remediation of a building they did not build and have no control over.

Table 8 suggests the accountable person If not undertaking the role of building safety manager themselves needs to appoint suitably competent people to undertake the work on a daily basis. It is extremely unlikely that any building safety manager they an organisation or an individual well be able to or wish to undertake all the relevant tasks themselves. Therefore there also needs to be a requirement for the building safety manager since you're anybody they engage has the skills knowledge experience and behaviours necessary to do what they need to do. Non specialist contractors such as Internet cabling contractors and decorators can significantly compromise fire safety and in particular compartmentation within a building. It is therefore essential that contractors such as these are also competent.



**Question 44 Do you agree that the proposed duties and functions set out in Figure 8 for accountable persons for category two buildings are appropriate?**

Despite their being a legal duty under the fire safety order to provide Fire Safety Information to the Responsible Person and it being impossible to manage fire and structural safety within a building without information on the fire strategy and details any active or passive fire safety measures they legislation and table 8 are silent about maintaining any sort of fire safety information. If you are not aware of what walls are compartments walls, what doors are fire doors, how the smoke extraction system operates, etc, you cannot manage fire safety in the building. It is unreasonable to ask a fire engineer to reverse engineer any building under 18m each time they visit to work out whether it is constructed in accordance with the Building Regulations and remain safe to occupy.

There is no mention of maintenance or inspection records, records of competence and training or details of those who plan, manage and monitor fire and structural safety.

If this bill is intended to ensure residents safety it is strange but there is no requirement to develop or deliver a resident engagement strategy in category two buildings.

**Question 45 Do you think that the different roles and responsibilities for category one and category two accountable persons are clear and proportionate?**

There is insufficient detail for both category one and category 2 accountable persons. There is very little consideration given to cost recovery.

**Question 46 Are there any additional duties that should be placed on dutyholders?**

Dutyholders should ensure that's all contractors who undertake activities in relation to four or structural safety or carry out work that can affect the safety of the building have the necessary skills knowledge experience and behaviours.

**Question 47 do you agree with our proposed fire safety outcomes?**

Yes although as noted paragraph 7.8.14, most fires originate in flats rather than common parts, there is therefore little that can be done to reduce the likelihood of fire in flats. It would appear not unreasonable to require that residents to do their part and undertake 5 year electrical inspections, annual gas safety checks and remediate any defects in the inspection or checks.

**Question 48 do you agree with our proposed overall purpose of a fire risk assessment?**

No. It would appear more logical to have common standards in Wales and England and make PAS 79-2:2020 Fire risk assessment. Housing. Code of practice the standard to be complied with.

**Question 49 do you agree with our proposed risk areas?**

We are broadly in agreement with the following caveats:

It appears strange to exclude the need for electrical inspections and annual gas safety checks however to include a requirement to consider internal structure, the maintenance and inspection of which will be equally expensive and disruptive for the residents. That is not to suggest that internal structure should not be considered, but only to explain that the costs of leasehold are usually borne by the leaseholders. There is therefore little point in excluding one important measure and including another.

In 7.8.20 it is suggested that flat front doors need to be certified. Requiring all doorsets that are not certified to be replaced will involve significant cost, which in leasehold blocks of flats will be borne by leaseholders.

In 7.8.22 one needs to be careful about the requirements in relation to escape routes. It is hard in many cases to alter escape routes in large buildings and when possible it would be expensive. The unintended consequences could be risk assessors proposing actions that effectively make existing buildings unoccupiable because they cannot be implemented at an affordable cost.

We do not agree with the suggestion in 7.8.29 to install automatic fire alarms in purpose built blocks of flats. They could lead to whole building evacuation when this is unnecessary and may delay the fire and rescue authorities ability to fight a fire. Such a system is vulnerable to false alarms which will lead to residents ignoring alarms and unnecessary attendance by the fire and rescue service with the inevitable risk of false alarm charges.

**Question 50 do you agree that a fire risk assessment must be renewed annually and whenever premises are subject to major works or alterations for all buildings in scope?**

Yes we believe this is appropriate and will avoid the inevitable disputes caused by a system where the frequency is dictated by the risk assessor based upon risk.

**Question 51 do you agree that only suitably qualified experienced fire risk assessors should undertake fire risk assessments for buildings within scope?**

Yes, however, as you note, clear guidance is required on what a suitably qualified experienced fire risk assessor looks like. It is essential that the standards are common in both Wales and England

**Question 52 Do you agree that fire risk assessments must be permanently recorded?**

Yes however we would suggest that there is a statutory limit on the time that they need to be maintained for. We would suggest that risk assessments should be maintained for 7 years for the regulator but there be a requirement for only current one to be shared with residents. To support this we suggest that the Fire Risk Assessor is required to check whether any actions in the previous assessment have been completed and to carry over onto the current risk assessment any outstanding actions with a note to confirm that they remain unactioned.

**Question 53 do you have any views about whether accountable persons or their employees should be precluded from conducting fire risk assessments themselves?**

We believe that having an independent fire risk assessor is desirable.

**Question 54 do you have any views on enforcement or sanctions for non-compliance with regards to the accountable person?**

Enforcement is always required to ensure there is compliance, however it must be remembered that in leasehold properties where there is a resident's management company or Right to manage company the company relies upon volunteer directors to operate.

The memorandum and articles of many residents management companies and right to manage companies require directors to be a leaseholder.

Making the penalties too severe will further discourage residents to come forward in an area where it is already hard to find volunteers. There is also a significant risk that those who do volunteer will be necessarily risk tolerant which cannot be the desired outcome.

If the penalties are too severe it is likely that the only director will be the one who did not resign quickly enough. This cannot be in the interest of good governance of management companies.

As noted before, if the law is written to permit Management Companies to appoint Professional Directors the issue will to some degree be overcome, however professional indemnity insurance for such directors may be expensive.

An alternative to fines and jail terms would be the disbarring of directors or enforced removal of directors by the regulator. This would address the issues discussed above with regard to volunteer directors and be a serious incentive for professional directors to act appropriately.

We do agree however that there must be accountability.

**Question 55 do you have any views on enforcement or sanctions for a person undertaking a fire risk assessment without suitable qualifications or experience?**

Those who choose to undertake a risk assessment without suitable qualifications or experience make a conscious decision to do so, so should be subject to appropriate sanction? It is imperative however that what constitutes suitable qualifications or experience in different types of building is clear and unambiguous?

**Question 56 do you agree with our proposal to create duties with regards to compartmentation on accountable persons**

It is appropriate however the duties must be supported with a duty on residents to permit access to their demised area for inspection and where the walls are not demised to the leaseholder to undertake remedial work, to cooperate with the AP in the execution of their duty and where the compartmentation is demised to undertake the remedial work themselves. There must be a right for the AP to take action, obtainable through the courts or tribunal, where the leaseholder fails to take action.

It is imperative that fast resolution should be available even if this must be through the courts or tribunal or courts. Costs, which will be covered by the service charge and therefore paid by leaseholders, for enforcement must be reasonable. The process must therefore be streamlined but have checks and balances to prevent abuse. The assistance of Fire and rescue service / the regulator through the use of notices following mandatory reporting of resident [leaseholder] offences is one option.

**Question 57 do you agree with our proposal to create duties with regards to compartmentation on residence**

Yes we strongly agree with this requirement as noted in our response to Question 56.

**Question 58 do you agree the concept of a safety case for category one buildings is an appropriate way to assess and manage the risks of building safety issues?**

In relation to fire safety the safety case appears to duplicate much if not all of what is required within a fire risk assessment. Duplication must be avoided because it will lead to unnecessary costs that will need in leasehold buildings to be paid by the leaseholders.

**Question 59 what do you believe would be a reasonable time scale for existing category one buildings to create a safety case**

The time scale will need to reflect the number of specialists available to identify and recreate this information. Although the numbers of buildings in Wales is relatively modest the same requirement will be implemented in England at the same time. We would suggest the time scale is made dependant on the risk .

**Question 60 do you agree there should be a mandatory reporting duty on dutyholders in the occupation phase**

For a mandatory reporting system to be effective it must be either anonymous or there must be immunity from prosecution in relation to the issue raised. If neither is the case issues are either unlikely to be reported or issues will 'not be found'.

Much will depend on the objectives of such a requirement. If learning is the end, then anonymous reporting would be appropriate, as has been found in the CROSS and SCOSS structural safety reporting system.





**Question 61 which incidents and issues do you think should trigger such a duty and why**

We do not believe that a mandatory reporting duty will have the effect that is desired.

However we do believe that any fire, regulator enforcement notice, structural defect, compartmental, etc. failure should be notified.

**Question 62 should there be requirement for the accountable person to register under the building safety regime during the occupation phase**

Yes we believe it's appropriate that the accountable person registers the building. As the registration process will make the accountable person known to the regulator it is likely that only those who are truly accountable will enter their name onto the registration.

**Question 63 are the registration process requirements sufficient. Are there any others that should be included**

Depending on who is in law determines is the accountable person, 'the person or entity that is performing the property management function' could be the management company (residence management company [RMC] or right to manage company [RTM]) and/or the managing agent. Clarification is clearly needed on what is meant by those performing the property management function. See also response to Q36.

**Question 64 should there be a requirement for dutyholders (both the accountable person and the building safety manager) to obtain a building safety licence in the occupation phase**

If the Accountable Person is to be the owner of the building, requiring a licence would appear to restrict the right to own a property. A duty similar to that set out in both the Management of Health and Safety at Work Regulations and the Fire Safety Order to appoint one or more people to advise them would appear more appropriate. On category 1 buildings a requirement on the BSM to make the Accountable Person aware of their duties as is the requirement under CDM 2015 would also resolve the issue.

Requiring a building safety manager to have a licence would provide clarity to Accountable Persons and residents as to who is and who is not competent to fulfil that role.

**Question 65 are there any other requirements that should form part of the licencing process for accountable persons in addition to the completion of basic training about the building safety regime and the fit and proper person tests [category one buildings only]**

We do not believe in the licencing of accountable persons for the reasons described above.



**Question 66 should there be a competence requirement and or minimum qualifications for those manage in category two buildings. If so what criteria should those engaging in such services meet.**

Yes, driving up the standards within the industry is something the ARMA fully endorse. ARMA are working with a number of members of Working Group 8 (the Building Safety Alliance) to identify the appropriate standards for managing agents and are keen to work with the Welsh government on this matter. All people managing category two buildings should we believe have an appropriate level 4 qualification.

**Question 67 Do you agree that there should be regulation of all residential management property**

The Association of Residential Managing Agents (ARMA), represents over 325 professional managing agents in England and Wales. ARMA has 291 full members and 35 Associates (firms with less than two years trading).

ARMA members collectively manage around 1.6 million leasehold properties. In 2014 ARMA introduced a new self-regulatory regime for its members known as ARMA-Q. This aimed to raise standards and the quality of service across the residential leasehold management sector and by 2016 all ARMA members had met the new regime.

ARMA-Q has now evolved into what it is known simply as 'ARMA Accreditation'. This places consumers at its heart and requires all members to meet a new Consumer Charter and Standards (Ref 1). There are 180 Standards and these have been developed specifically for managing agents. These Standards include but are not limited to the RICS Service Charge Residential Management Code. ARMA members are regulated by an independent Regulatory Panel made up of six lay members. Each has been specially selected for their knowledge of the industry. They have a collective experience spanning law, accounting, consumer, surveying and regulatory professions. Most importantly, leaseholders are represented on the panel. The role of the panel is to provide independent regulation of the Member and Associates of the Association.

ARMA therefore has substantial experience in developing and regulating standards specifically within the residential property management industry and is well placed to advise the Government on policy

The 326 ARMA managing members represent approximately 40% the MAs in England and Wales, and together manage 1.6 million leasehold homes. Although ARMA members represent nearly all of the larger firms, for the sake of simplicity assume that the other half of the MAs (i.e. non ARMA firms) also represent a million homes. According to the latest Government figures this leaves approximately 2m leasehold homes outside of the MA sphere.

Given that the average service charge was stated in the Competition and Markets Authority 2014 report (Ref. 2) to be £1,100 per annum, we can infer that £2.42bn of leaseholder service charge funds are managed without an MA. It is therefore important that consumer protection is extended beyond the MA sector into self-managed blocks.



There are a range of measures in place to protect consumers. Section 19 of the Landlord and Tenant Act 1985 allows leaseholders to challenge unreasonable service charges via the First Tier Tribunal Property. The two Ombudsman schemes (The Property Ombudsman) allow leaseholders redress against poor service standards provided by MAs.

ARMA does believe that regulation of the MA sector is desirable and, in the absence of mandatory regulation, implemented its own self-regulatory regime, which requires its members to adhere to a strict set of 180 Standards, underpinned by regular independent external audits of every Member and an independent Regulatory Panel to consumers in the event of breaches of our Standards.

However, self-regulation is inherently flawed when adherence to those regulations are only required by ARMA members and are therefore essentially voluntary within the industry as a whole. Indeed, this can lead to the MAs who abide by the self-regulatory regime (i.e. ARMA members) being at a competitive disadvantage to MAs who do not, which cannot be in the consumers interest. ARMA believes that there should be a “Licence to Operate” for MAs, most likely in the form of an approved register.

To be entered on the register a firm would have to demonstrate that the principal of the business is a “fit and proper” person, that the firm is a member of an accredited trade body, such as RICS or ARMA, that the firm belongs to an Ombudsman scheme and that Client Money Protection at an applicable level is certified.

ARMA believes there should be a requirement for all MAs to be members of a relevant professional body, the latter to be approved by Government.

However, we would add a non-regulatory independent body provided by Government that holds a register of firms and grants the licence to operate.

This mechanism would take the Scottish registration system as a basis but recognise the huge value of the ARMA and RICS standards and regulatory mechanisms already in place. Both of these professional bodies have Codes in place that have been tried and tested over the years. Both would need to apply to Government to have their Codes approved.

ARMA would see this working as follows. Organisations would require a Licence to Operate. This would be administered by the Government body. It should be cost neutral to the Exchequer as the Licence to Operate would carry an appropriate, tiered, fee. To issue the Licence to Operate the Government body would require a “fit and proper” person test on the Principal(s). Membership of a professional body such as RICS or ARMA would be mandatory and many of the desirable administrative requirements such as a suitable level of PI insurance, membership of an Ombudsman scheme and perhaps Client Money Protection could be moved down into the professional body membership requirement.



This also leaves the ongoing relevant checking and auditing costs within the professional body rather than with the Government body. Should a firm leave the professional body the latter would notify the Government body. This will allow the latter to check for firms avoiding reprimand by switching bodies. Membership of the professional bodies can be policed by the current structures in place, which is simpler than establishing a new Regulatory oversight. ARMA believe this option will be the fastest, easiest and most flexible option and will build upon the Codes and standards that are already in the market.

**Question 68 what standard should those carrying out residential management functions meet. Should there be a differentiation between the standards required for those managing category two buildings and those managing unadopted spaces**

The requirements should include the introduction of Government approved/Licensed professional trade bodies (currently the appropriate organisations are RICS and ARMA) to which membership of at least one should be mandatory.

Controlling Principals should be required to demonstrate that they are a “fit and proper” person. There is an argument that at least one principal should hold a relevant professional qualification – in fact this is already a requirement of RICS. For ARMA members, at least one principal should be qualified to MIRPM or AssocRICS level. Client Money Protection at an appropriate level should be mandatory where consumer funds are held in a bank account by a third party, whether a Managing Agent, landlord, self-managing block (RTM or RMC), etc. Membership of an appropriate property Ombudsman scheme is already mandatory and should be maintained.

The above should not be restricted to MAs only, but must include any entity directly engaged in the management of long leasehold property and the holding of client funds. Introducing additional requirements for entry should not significantly affect innovation.

If someone is motivated enough to enter the sector, the time taken to obtain the relevant qualifications can only be beneficial to the sector as a whole. Minimum entry requirements are in consumers’ best interests.

Personal qualifications relevant to the residential long leasehold property management industry include those provided by the Institute of Residential Property Management (IRPM) and the Royal Institution of Chartered Surveyors (RICS):-

- AIRPM (Entry level for the IRPM. Must be involved in the provision of residential property management services, but can be legal, accountancy or property manager based).
- MIRPM (an exam based structured training qualification. A minimum of 3 years’ experience necessary prior to application. Course material based solely on residential property management and open to residential property managers only).
- FIRPM (a step up from MIRPM, based on a supplemental application and demonstrating a higher level of experience and expertise in residential long leasehold property management).
- AssocRICS (either a direct exam-based route via the RICS or step up from the MIRPM qualification subject to passing an RICS ethics test).



- MRICS (an exam/interview based structured training qualification. A minimum of 2 years' experience and a relevant University Degree is the normal route prior to application. Candidates must be able to demonstrate practical experience and competence in a wide range of property related fields. First time pass rates are circa 60%).
- FRICS (a step up from MRICS, based on a supplemental application and demonstrating a higher level of experience and professional achievement). These directly relevant personal qualifications are considered adequate for the purpose of regulation.

A requirement for RTM and RMC company directors (even those who have appointed a MA) should also acquire certification by attending a short course on their roles both as a UK company director and as a director of an RMC/RTM. This would cover legislation surrounding both company and leasehold law such as company reporting requirements, Section 20, treatment of service charge excesses etc. Evidence of MAs professional skills with regards to financial reporting could be highlighted due to the extensive requirement for the preparation and completion of budgets and accounts.

The “fit and proper” person declaration could be adopted to mirror the existing Scottish requirement. However, a tiered/hierarchical system could be very difficult or almost impossible to properly monitor/regulate and would need more consideration. Initially, at least, Principals/Company Officers would need to take ultimate responsibility for their employees. Consideration should be given to a mandatory level of relevant Continuing Professional Development or structured learning. This is already a requirement of both IRPM and RICS, which require 15 and 20 hours respectively per annum to be recorded/uploaded to the relevant body's portal. Within companies, ARMA believes that client-facing roles should require minimum levels of relevant qualification.

In terms of core elements that should be included:

- Ethics – certified by an online test.
- Standards of service – overseen by the Ombudsmen.
- Financial transparency – overseen by the First-tier Tribunal Property.
- Financial probity – as evidenced by an appropriate Client Money Protection scheme.

Any Code will need to incorporate these four elements. As per the Scottish system, failure to operate without having been accepted on the approved register and practicing as a MA of long leaseholder property without a Licence to Operate should be a criminal offence. There needs to be a real personal deterrent to operating outside the system. Professional bodies or a Regulatory body (e.g. RICS and ARMA) would oversee adherence to the code and, in the case of proven breaches, employ a sliding scale of measures/sanctions, up to and including expulsion from the register.

**Question 69 how could these issues of probity and responsibility be evidenced in such a system**

Companies should require a Licence to Operate via an approved register. This should be extended to all parties involved in the overall management of leasehold property. For example, a landlord, RMC or RTM would need to register for a Licence unless they have appointed a third party that is on the register.

Anyone practicing in the capacity of a MA of long leaseholder property without a Licence to Operate should be a criminal offence. Accordingly, if they fail to appoint a third party that is on the register they would be committing a criminal offence. This would ensure compliance and also act as a mechanism to weed out unregistered third parties.

Likewise, MAs operating without being on the register should be a criminal offence as per Scotland. Membership of the register would require proof of membership of an approved trade body such as RICS and ARMA (which means that the company has already passed certain criteria such as proof of PI, certification of a relevant level of CMP, membership of an Ombudsman scheme). Suitable levels of qualifications for senior staff, qualified staff ratios, etc can be subsequently added. Registration could be required on an annual (or if this is administratively onerous, three yearly) basis. Should a company fall short of the required standards a warning can be issued, requiring rectification within a certain timeframe. Failure to comply would result in suspension or removal of the Licence to Operate until compliance is reasserted.

**Question 70 do you agree that all accountable persons should be required to promote building safety**

Yes

**Question 71 do you agree that this information should be provided in a way that is accessible and understandable and should where relevant reflect specific needs of residents**

To be cost effective and therefore affordable by residents the only appropriate way to make information available is via cloud-based document management applications and, by exception to those without Internet facilities, in paper form.

The information in 8.2.8 will however require a considerable amount of administration if it is to be up to date and relevant. All of this will come at a cost to residents. Where a resident requests a paper copy is it appropriate that's all other residents should pay for the additional costs associated with this?

The more information that is required, the more the systems will cost to administer, and the more residents will have to pay through their service charge. Should those who do not want to view the information pay the significant costs associated with the provision. Should residents be given the option, on a democratic basis, as to whether they want the information or not?



**Question 72 do you agree that a nominated person who is a non resident would be able to request information on behalf of a resident who lives there. If yes who do you believe that nominated person should be**

The term resident is not established in property law. In the draft Building Safety Bill the term 'resident' is defined as 'a person who lawfully resides in a dwelling'. There will be residents in a building that are lawfully entitled to be there but who may be unable to prove that this is the case. Managing agents for in a long leasehold block of flats should be aware of the names of the leaseholders. They are unlikely to be aware of the names of any tenants whose names may only be known by the leaseholder and where they have one, their letting agent. In many cases the tenants may have children whose name will certainly not be known by either the managing agent, the leaseholder or a letting agent. If the dutyholder has a duty to communicate to a resident how do they determine who is and who is not a resident. Where you can identify a resident and they choose to identify a non-resident to request information on their behalf there appears to be no reason why this should not happen. However such a system is open to abuse. To prevent such abuse will evolve a significant amount of bureaucracy.

In leasehold premises information should be provided to the leaseholder who then has a duty to disseminate to tenants or co occupiers. Requests from tenants or co occupiers need to go through the leaseholder.

**Question 73 is there any other information that an accountable person should be required to provide on request**

No as noted in question 71 above we have significant concerns about the costs to residents associated with this requirement. It is far from certain that the majority residents want this information and, where they do, whether they will continue to do so when they realise that they need to pay for the privilege.

**Question 74 do you agree that for category one buildings the accountable person must provide the information as set out in paragraph 8.2 10**

The list appears appropriate.

See also the response to Q72 with regard to the identification of residents.

**Question 75 is there any other information that you think would be useful to provide**

No

**Question 76 in what ways could an accountable person demonstrate that they have established effective two way communication**

Accountable person to demonstrate that they have established effective two way communication by providing the information and responding appropriately to any questions or feedback received.



**Question 77 do you agree that there should be a new requirement on all residents of buildings within scope to cooperate with the accountable person and their appointed representative to allow them to fulfil their duties under the building safety regime**

Yes, it is entirely appropriate without cooperation from residents it is impossible for the accountable person and their building safety manager or managing agent to comply with the duties imposed upon them.

**Question 78 do you think there should be any specific requirements to facilitate this**

The must, in our opinion be:

- A right of access in residents premises (demised areas) to undertake any duties in accordance with the bill;
- The right of access can be obtained having given the resident notice the time access is required and the justification for access;
- There must be a specified period before access is required for the notice to be served;
- It must be possible to apply to the tribunal courts where access it's refused.

The accountable person must be able to serve notice on a resident where they believe they have or may do something that affects the safety of the building. The notice should set out the breach, identify the expected action and the date by which action should be taken. Once again, the accountable person should be able to apply to the courts where action is not taken by the resident and the significant risk to the building remains.

**Question 79 what safeguards should be put in place to protect residents' rights in relation to this requirement**

An Accountable Person will not be able to enter a flat or enforce any action unless the client agrees or the matter is enforced by the courts.

**Question 80 do you agree that there should be a new requirement all residents of buildings within scope not to knowingly breach compartmentation**

Yes, this is essential.

**Question 81 do you agree that there should be a single process for escalating concerns to the regulator in relation to the building safety regime regardless of category of building or where it is in the building life cycle**

Yes, we believe this is appropriate.

**Question 82 should a similar model be established to allow leaseholders to apply for a change or removal of the building safety manager. What would be an appropriate mechanism to do this**

Yes, we believe this should follow a process similar to that for the appointment of a manager under the Leasehold and Commonhold Reform Act 2002.





### **Question 83 what roles and responsibilities are appropriate for accountable persons with regard to people who cannot safely evacuate**

An accountable person should only be required to:

- make residents aware that they can communicate via them to the Fire and Rescue services where they will have difficulty self-evacuating and will need assistance from the Fire Rescue services;
- communicate such information to the Fire and Rescue services; and
- include such information in a secure premises information box.

It should be noted that it will be very difficult for the reasons expressed in Question 72 to communicate with all residents. It is also likely that information will very quickly become out of date .

The only reasonable way to overcome this is to require residents to reconfirm or provide information again on an annual basis. Doing this will allow notifications over a year old to be removed.

### **Question 84 should accountable persons who required to collate details of all those who require assistance**

It would be perhaps easier and more effective for Fire Rescue services to maintain a central register of information and allow residents to communicate this information by telephone or online although it is accepted that costs for this would you born by the Fire and Rescue services and therefore the tax payer.

Alternatively it would perhaps be more reliable to require:

- those with Safeguarding responsibility to notify the Fire and Rescue Authority where they believe that a person may need assistance with evacuation and in their view is unable to notify the FRA themselves;
- the Responsible Person to advise all those who are not able to self evacuate to notify the FRA using the 999 service when they become aware of a fire in their building of this fact.

### **Question 85 should accountable persons be required to provide this information immediately to the Fire and Rescue service in the event that an evacuation was necessary**

To make this a requirement all buildings would need to be manned on a 24 hour basis or there would need to be a duty resident who is able to hold and pass over the information.

As most buildings do not have permanent staff this requirement appears to be unreasonable and unaffordable full residents

**Question 86 should this be the case for all categories of building**

One must question the benefit of collecting collating and communicating information that is likely to be out of date when it is needed. It is more likely with such a system that Fire and Rescue services will spend time unnecessarily trying to rescue people who are either not in the building anymore or were not in the building at the time of the fire. A simpler and more reliable solution, as noted above, would be to require:

- those with Safeguarding responsibility to notify the Fire and Rescue Authority where they believe that a person may need assistance with evacuation and in their view is unable to notify the FRA themselves;
- the Responsible Person to advise all those who are not able to self-evacuate to notify the FRA using the 999 service when they become aware of a fire in their building of this fact.

**Question 87 do you agree that the Welsh government should pursue our means to protect workers from raising concerns with regards building safety**

Yes

**Question 88 are there any actions that could be taken ahead of legislative reform that would support local authorities and Fire and Rescue authorities to manage multi occupied residential buildings in a more holistic way**

No response

**Question 89 do you agree with the list of key functions for the regulator as proposed**

Yes

**Question 90 other additional functions which are not listed that you believe are required in order to achieve are building safety aims**

No response

**Question 91 do you think that some of these functions are more essential than others**

No response

## Action Plan for Safer Buildings in Wales.

### Overview:

This White Paper sets out proposals for comprehensive reform of legislation that contributes to building safety in Wales. It focuses on legislative change across the lifecycle of buildings as well as setting out aspirations for culture change in the way buildings are designed, constructed and managed.

### The Scope of the Building Safety Regime:

The Building Safety Regime covers all multi-occupied residential buildings. By multi-occupied residential building we mean any building where there are two or more dwellings, regardless of whether there is a shared front door to the building. This means that the scope of the regime would capture a house converted into two flats, a licensed HMO through to a high-rise apartment block.

### Option A: Two Categories of Risk

There are two categories of building set out in the Building Safety Regime:

- Category 1 – these buildings would be subject to the most onerous requirements of the Building Safety Regime. These buildings will be 18m or more in height or more than 6 storeys and contain two or more dwellings. For example, a 7-storey block of flats used for student accommodation; or an 8-storey block of leasehold properties; or a mixed use 13 storey building with 4 floors of flats.
- Category 2 - these buildings would be subject to numerous requirements of the Building Safety Regime. These buildings will be residential properties with two or more dwellings that are no more than 18m in height. For example, this category could range from a house converted into two flats; a licensed HMO; to a 5-storey purpose-built block of flats; or a 4-storey office block converted into flats.

Warwick currently have **5** sites that would fall into **Category 1** and 31 that fall into Category 2. These figures do not include the number of blocks within those sites that would fall into Category 1.

### Option B: Three Categories of Risk

Below is an indication of the types of buildings that might fall within these categories:

- Advanced – these buildings will be subject to the most onerous requirements of the Building Safety Regime. These buildings will be 18m or more in height or more than 6 storeys and contain two or more dwellings. For example, a 7-storey block of flats used for student accommodation; or an 8-storey block of leasehold properties; or a mixed use 13 storey building with four floors of flats.
- Enhanced - these buildings will be subject to numerous requirements of the Building Safety Regime. These buildings will be properties with four or more dwellings and that is no more than 18m in height. For example, this category could range from a house converted into seven flats; a licensed HMO with six bedrooms; a 5-storey purpose-built block of flats; or a 4-storey office block converted into flats.
- Standard – these buildings will be subject to the least onerous requirements of the Building Safety Regime. These buildings will be properties with 5 or fewer dwellings within a single

property, for example a house that has been converted into two flats, or a licensed HMO with 5 bedrooms.

The majority of Warwick's portfolio would fall into the Enhanced Category based on sites only (5 sites in Advanced).

Warwick have no preference to the Options A or B.

### **During Design and Construction**

Warwick Estates do not get involved at the Design and Construction stage. If Warwick was to be involved, then the necessary steps would take place to ensure the procedures are followed and ensure involvement with the local building control.

### **Dutyholders during Design and Construction**

Warwick Estates would not expect to take any of the roles for Dutyholder at this stage.

### **Gateways and Building Control Bodies**

Warwick Estates would only expect to be involved at the Gateway 3 Stage (shortly before the building's occupation). Inspections would be carried out to ensure Warwick are happy with occupation and necessary works are completed.

### **Golden Thread**

Warwick Estates already has a system that is being developed and additions made to cope with the Golden Thread content. This is an online system that Regulators could be given access to. All steps would be taken by Warwick to ensure that when taking on a newly constructed site, the necessary information is handed over to store for the Golden Thread.

Golden Threads for existing buildings, both Category 1 and Category 2, is already being worked on.

### **During Occupation**

As already mentioned, it is rare that Warwick are involved at his stage, but plans will be put in place to ensure building safety before occupation including fire risk assessments and a review of the documentation provided.

### **Dutyholders during Occupation**

Warwick's stance on the Building Safety Manager who would potentially responsible during this stage is not yet confirmed. Current ideas that a Building Safety Manager will manage between 7-10 buildings is seen as impractical. One site can have as many as 36 blocks within our portfolio, that could mean 4 Building Safety Manager just for that one site. This would mean a minimum of 4 new staff just for a portfolio of 36 sites, this is not considering the number of blocks with 3 sites have more than 10 blocks. Who will cover these costs for additional staff and how can 4 new Building Safety Managers be found, when research has shown there are no professionals that currently match the (English) Governments ideas for competency levels.

### **Duties in Occupation**

These duties are already part of Warwick Estates management of currently managed sites. FRA's in most instances are planned annually and the reports consider compartmentation and external walls

coverings. They not what the next steps are needed on each of these items which in most instances would mean Fire Engineer professionals being appointed.

The addition of the Safety Case and mandatory reporting to the Building Safety Regulators is an addition to current management. The Building Safety Manager would be responsible for this, but again the difficulties of finding such an individual will be very difficult.

An easier option would be a team of people covering the competencies needed, managing more buildings reducing the costs for the leaseholders.

### **Compartmentation**

Checks on compartmentalisation would be carried out as part of fire risk assessments completed before occupation. This is also part of the ongoing management and annual fire risk assessments to note any issues.

### **Safety Case**

As mentioned earlier, Warwick feel this will become part of the Building Safety Manager's responsibilities, but again the structure of this has not yet been agreed.

### **Registration and Licensing**

Warwick feel this will become part of the Building Safety Manager's responsibilities, but again the structure of this has not yet been agreed.

### **Engaging with Residents**

This is already carried out as part of the role of a Property Manager in Warwick Estates. Additional communication will be needed on how the process works and what costs are incurred and how payment is made.

Residents and leaseholders are already encouraged to engage with Warwick giving them numerous avenues for this including a Live Chat facility.

With the Golden Thread being online, residents and leaseholders will have access to all information and we will continue to send out annual fire safety communications.

### **Roles and Responsibilities of Residents**

Communications will outline the responsibilities of residents, but we already have this facility with "House Rules", "Annual Fire Safety Letters" and of course budgets. The Building Safety Charge will have separate accounts, which will have added information of "why" and this again will have additional costs for the leaseholder.

### **Regulating the Building Safety Regime in occupation**

As mentioned earlier, Warwick feel this will become part of the Building Safety Manager's responsibilities, but again the structure of this has not yet been agreed.

# Agenda Item 5

## Equality, Local Government and Communities Committee

25 February 2021 – papers to note cover sheet

Paper no.	Issue	From	Action point
ELGC(5)-04-21 Paper 8	Inquiry into fire safety in high-rise buildings	Letter from the Chair of the Petitions Committee in relation to fire safety in high rise buildings	To note
ELGC(5)-04-21 Paper 9	Inquiry into the impact of COVID-19	Report from the Bevan Foundation "Different experiences of poverty in Winter 2020" in relation to the impact of COVID-19	To note
ELGC(5)-04-21 Paper 10	Inquiry into the impact of COVID-19	Report from the British Red Cross "The longest year" in relation to the impact of COVID-19	To note
ELGC(5)-04-21 Paper 11	Inquiry into Rough Sleeping	Letter from the Minister for Housing and Local Government in relation to the impact of COVID-19 and rough sleeping	To note

John Griffiths MS  
Equality, Local Government and Communities Committee  
Welsh Parliament  
Ty Hywel  
Cardiff Bay  
CF99 1SN

09 February 2021

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Dear John

**Petition P-05-1083 Protect leaseholders in Wales from paying for cladding remedial works**

The Petitions Committee considered the above petition for the first time during our meeting on 26 January.

We agreed to write to you to draw the petition and the evidence we have received to date to your Committee's attention, in the context of the work that you have done in relation to fire safety in high rise residential blocks.

We also agreed to write to the Minister for Housing and Local Government to clarify the value of any funding consequential that the Welsh Government has received as a result of spending on this issue by the UK Government, and for details as to what any funding has been used for to date.

Further information about the petition, including all the correspondence we have received, is available on our website at:  
<https://business.senedd.wales/ieIssueDetails.aspx?IId=35070&Opt=3>.

If you have any queries, please contact the Committee clerking team at the e-mail address above, or on 0300 200 6454.

Yours sincerely



Janet Finch-Saunders AS/MS  
Cadeirydd/Chair

# Agenda Item 5.2 Different experiences of poverty in Winter 2020

February 2021





## About the Bevan Foundation

The Bevan Foundation is Wales' most innovative and influential think tank. We develop lasting solutions to poverty and inequality.

Our vision is for Wales to be a nation where everyone has a decent standard of living, a healthy and fulfilled life, and a voice in the decisions that affect them.

As an independent, registered charity, the Bevan Foundation relies on the generosity of individuals and organisations for its work.

## Acknowledgements

This document forms part of a broader project of work developed in collaboration between the Bevan Foundation and the Joseph Rowntree Foundation. The Bevan Foundation would like to thank the Joseph Rowntree Foundation for their ongoing support.



## How you can help

Hundreds of people and organisations across Wales enable the Bevan Foundation to speak out against poverty, inequality and injustice. We would not exist without their support.

To make Wales a nation of prosperity for all, where everyone can fulfil their potential no matter who they are or where they live, please join our community of supporters.

Your support and that of others makes a difference to us and a difference to Wales.

**Find out more at <https://www.bevanfoundation.org/support-us/individuals/> or email [info@bevanfoundation.org](mailto:info@bevanfoundation.org) to find out what you can do**

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Registered charity no. 1104191 Company registered in Wales no. 4175018

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## 1. Summary and key findings

The Bevan Foundation's report, *A snapshot of poverty in winter 2020* highlighted the devastating impact the pandemic is having on households across Wales and across the income distribution. Having looked at the impact of the pandemic by household income in the last briefing this note will look in more detail at the economic impact of the pandemic on different demographic groups. There are four key findings:

### 1.1 Incomes have fallen

Nearly a quarter, 24% of Welsh households have seen their incomes decrease as a result of the pandemic. There has been very little variation in the impact of the pandemic on household income by demographic groups. Only three groups appear to have been affected in a way that is significantly different to the Welsh average:

- Social renters and people over 65 appear to have been less significantly impacted than the general population.
- 50 to 64 years olds appear to have been at a significantly higher risk of seeing their incomes fall as a result of the pandemic.

### 1.2 Many households have seen their living costs increase

Thousands of households across Wales have seen their living costs increase:

- 41% of households are spending more on heating, electricity and/or water
- 38% of households are spending more on food
- 16% of households are spending more on internet costs or devices to access the internet.

Transport and adult clothing costs are the only two costs that have reduced for a significant number of households.

Some households have seen their living costs increase even more than the average. Groups that have been especially hard hit include:

- 25 – 49 year olds
- Social renters
- Lone parent households
- Couple households with children.

### 1.3 There has been a squeeze on living standards

Many households have seen their living standards drop as a result of the pandemic with some having to cut back their spending as a result of its economic impact:

- 22% have had to cut back spending on clothing for adults
- 15% have had to cut back on food for adults
- 14% have cut back on heating, electricity and/or water.

Some groups have been especially badly affected, these include:

- Disabled people or people with long term health conditions
- 50 – 64 year olds
- Social renters
- Private renters
- Single person households without children
- Lone parent households

#### 1.4 There is a growing personal debt crisis in Wales

Thousands of households have fallen behind on their bills or have had to borrow money as a result of the economic impact of the pandemic:

- Over 120,000 households, 9% of Welsh households have fallen behind on at least one bill since March 2020.<sup>1</sup>
- Over 200,000 households, 15% have borrowed money since March 2020.<sup>2</sup>

Some groups have been especially badly affected, these include:

- Disabled people or people with long term health conditions
- 25 – 49 year olds
- Social renters
- Private renters
- Lone parent households
- Couple households with children

Rising debt levels does not just have an impact on households in the near term but also has longer term implications. Households who are in debt face extra costs over the period that they pay off their debt. For households already struggling these additional costs may be a significant challenge.

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<sup>1</sup> Calculations done by Bevan Foundation based on Welsh Government Household estimates for Wales, 2019 data.

<sup>2</sup> *ibid*

## 2. Introduction

Back in December the Bevan Foundation laid bare the devastating impact that the Covid 19 pandemic has had on households in Wales. Data gathered by YouGov through a national online survey on behalf of the Bevan Foundation showed that a staggering 24% of Welsh households some 328,000 households,<sup>3</sup> have seen their incomes fall since the start of the pandemic. At the same time households have seen a number of key living costs increase including 41% seeing an increase in the cost of heating, electric and/ or water and 38% seeing an increase in the cost of food.

Our December briefing demonstrated that whilst the economic impact of the pandemic has hit people across Welsh society, it is the poorest households who have been most greatly affected, with many forced to cut back on essentials, to borrow money or to fall behind on their bills.<sup>4</sup> Other groups have also been heavily affected by the pandemic. This briefing note sets out to explore the impact of the pandemic on people by 5 key demographic characteristics:

- Disability and long term ill health
- Housing tenure
- Gender and household composition
- Age
- Ethnicity

All figures, quoted in this briefing, unless otherwise stated, are from YouGov Plc. The total sample size was 1,031 adults. Fieldwork was undertaken between 7th and 11th December 2020. The survey was carried out online. The figures have been weighted (unless specified otherwise) and are representative of all Welsh adults (aged 18+).

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<sup>3</sup> Calculations done by Bevan Foundation based on Welsh Government Household estimates for Wales, 2019 data.

<sup>4</sup> Bevan Foundation, *A snapshot of poverty in winter 2020* (December 2020) available at - <https://www.bevanfoundation.org/publications/poverty-in-winter-2020/>

### 3. Disability and ill health

The links between disability and poverty had been long established before the outbreak of Covid 19. Approximately 330,000 people who live in poverty in Wales are either disabled themselves or have a disabled family member, nearly half of all people living in poverty.<sup>5</sup> This existing inequality may, in part, explain why disabled people appear to have been particularly badly hit by the pandemic.

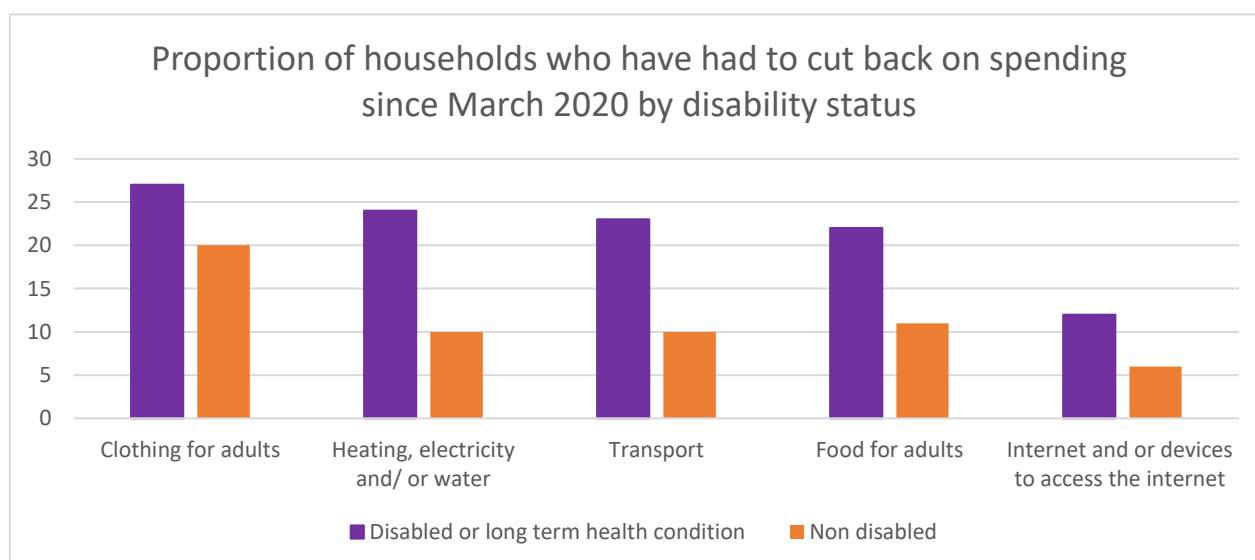
#### 3.1 Income and costs

A broadly similar proportion of disabled and non-disabled people have seen their incomes fall since March 2020. The proportion of non-disabled people who reported that their income had decreased by either a little or a lot stood at 23% compared with 25% of disabled people or people with long term health conditions.

Disabled people and people with long term health conditions have also seen their living costs rise broadly in line with non-disabled people over this period. The only notable distinctions are that a higher proportion of disabled people are reporting having to spend more on their heating, electricity and/ or water than non-disabled people (45% reporting an increase in their spending compared to 39% of non-disabled people) and that fewer disabled people have seen their transport costs fall over recent months than non-disabled people (44% of disabled people have seen no change in their transport cost compared with 41% of non-disabled people).

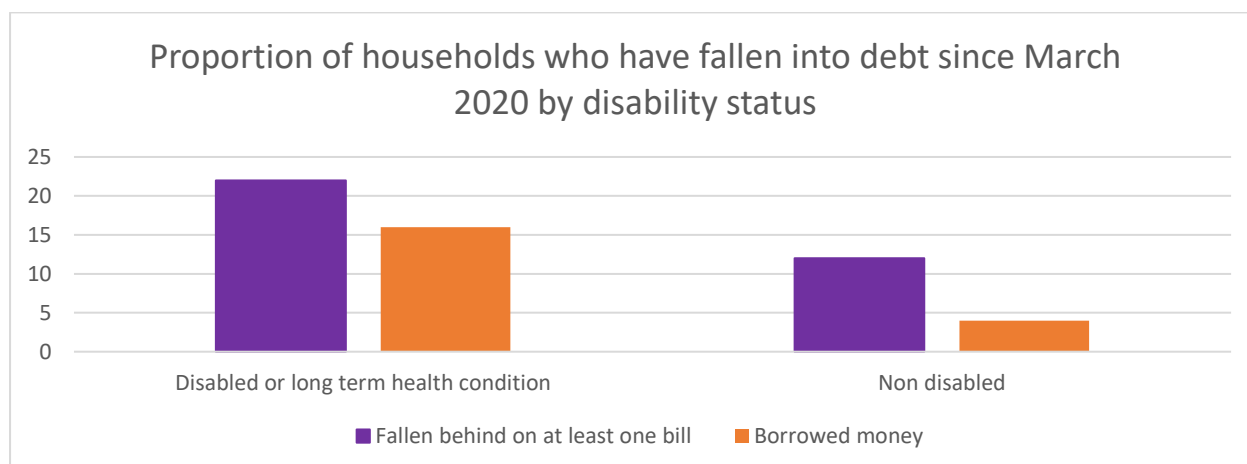
#### 3.2 Cutting back and debt

Despite the pandemic having a fairly even impact on the household income and living costs of disabled and non-disabled people, disabled people and people with long term health conditions have been far more likely to have had to cut back on their spending since the outbreak of the pandemic.



<sup>5</sup> Stats Wales, *People in relative income poverty by whether there is disability within the family (Equality Act definition)* available at - <https://statswales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/Poverty/peopleinrelativeincomepoverty-by-whetherthereisdisabilitywithinthefamily>

Disabled people or people with long term health conditions have also been significantly more likely to fall into debt as a result of the impact of the pandemic.

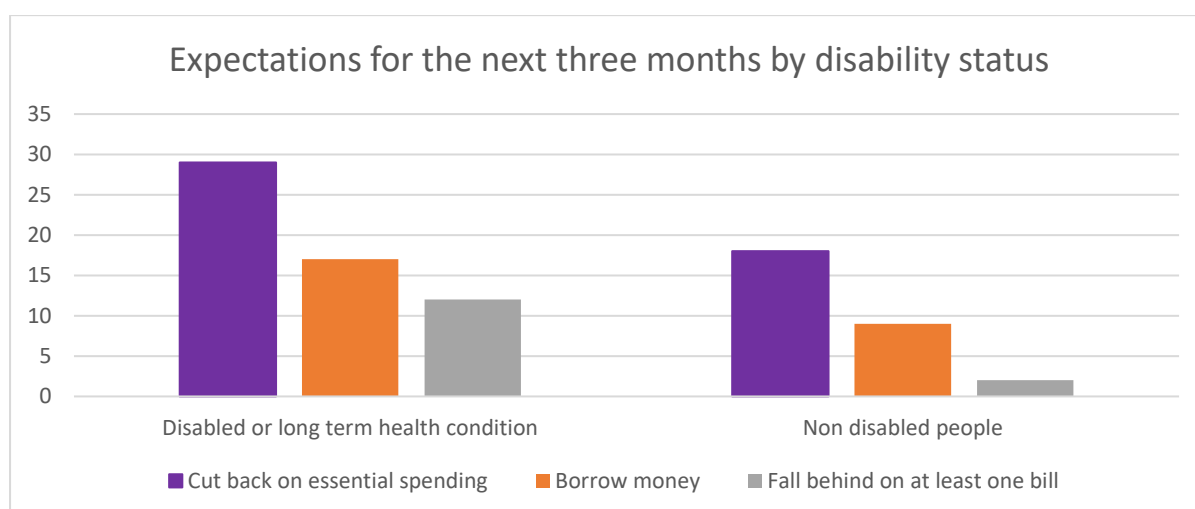


The fact that a significantly higher proportion of disabled people or people who have long term health conditions have had to cut their spending or borrowed money as a result of the pandemic despite not being disproportionately affected by falling incomes has some important implications for the way we measure poverty. It highlights that income based measures alone don't provide us with a full picture, living costs also matter.

On average, disabled people have higher living costs than non disabled people. This was true even before the pandemic. Any additional increases in living costs or a reduction in income can therefore hit disabled people hard, perhaps providing an explanation for the differing experiences of disabled and non disabled people when it comes to the impact of the pandemic on debt and living standards.

### 3.3 The next three months

Disabled people and people who have long term health condition are significantly more pessimistic about what the next three months may mean for their personal finances than non disabled people.



It is clear that there is a real risk that inequality could further deepen over the next three months, with some disabled people at risk of facing real hardship.

## 4. Tenure

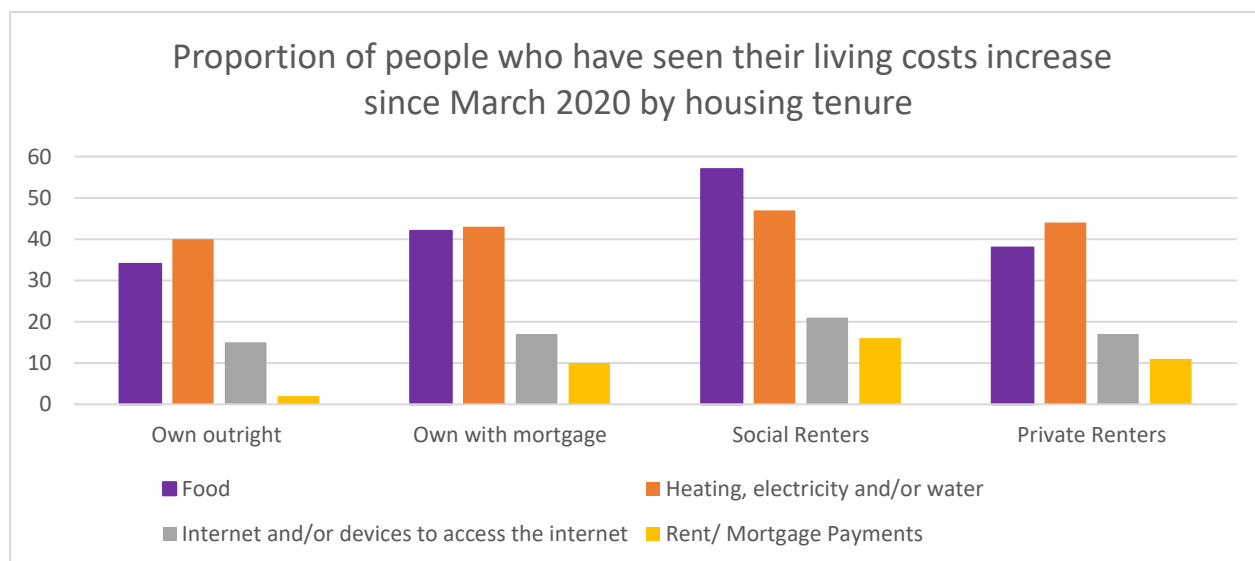
A household's housing tenure is one of the key factors that has an impact on their risk of living in poverty. Prior to the pandemic 13% of owner occupiers lived in poverty in Wales.<sup>6</sup> By contrast 41% of private renters and 49% of social renters lived in poverty.<sup>7</sup> The pandemic appears to have deepened these existing inequalities.

### 4.1 Income and costs

People have seen their income decrease regardless of which housing tenure they live in. Social renters do appear to have been affected less significantly, however, with 18% seeing their income decrease since March 2020. By contrast 22% of mortgage holders saw a reduction in their income, with the same being true for 25% of people who own their home outright and 26% of private renters.

One possible explanation for this is that social renters are significantly more likely to be in receipt of social security payments than households in other housing tenures.<sup>8</sup> Given that many benefits have been protected and indeed made more generous since the outbreak of the pandemic, this may have protected incomes.

Whilst social renters have been less likely to see their incomes decrease as a result of the pandemic than households in other tenures, they are far more likely to have seen their living costs increase over the same period.



Social renters are also the group that has been the least likely to benefit from a reduction in their housing costs. Whilst 10% of mortgage holders have seen their mortgage costs reduce since March, the same is only true for 5% of private renters and 2% of social renters.

<sup>6</sup> Stats Wales, *People in relative income poverty by tenure type* available at - <https://statswales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/Poverty/peopleinrelativeincomepoverty-by-tenuretype>

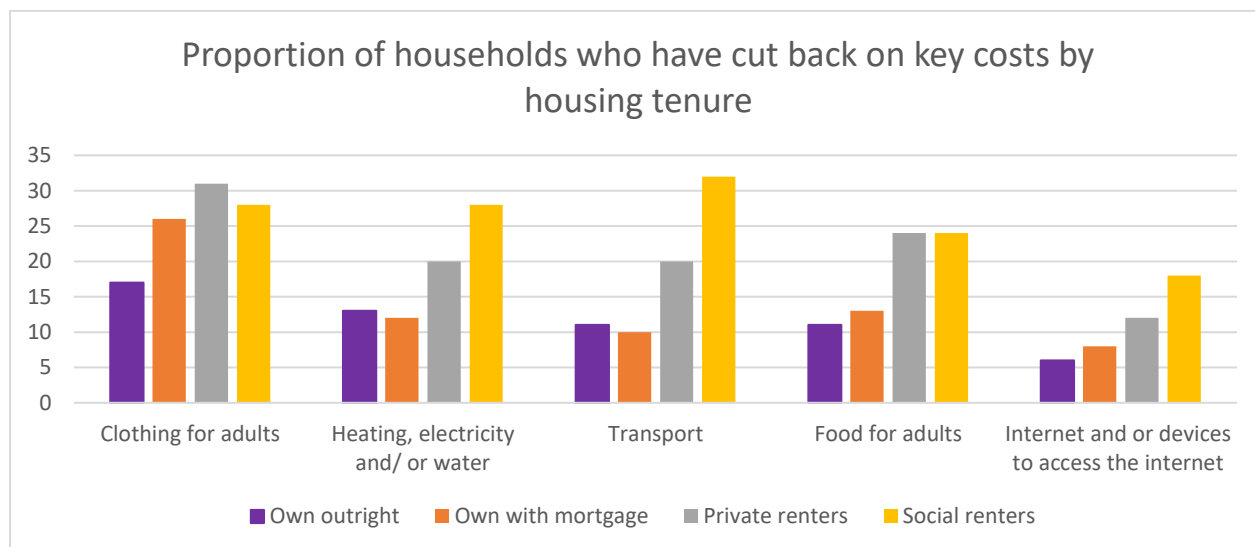
<sup>7</sup>ibid

<sup>8</sup> 60% of social renters who completed the survey receive at least one social security benefit. The same is only true of 34% of private renters and 13% of owner occupiers.

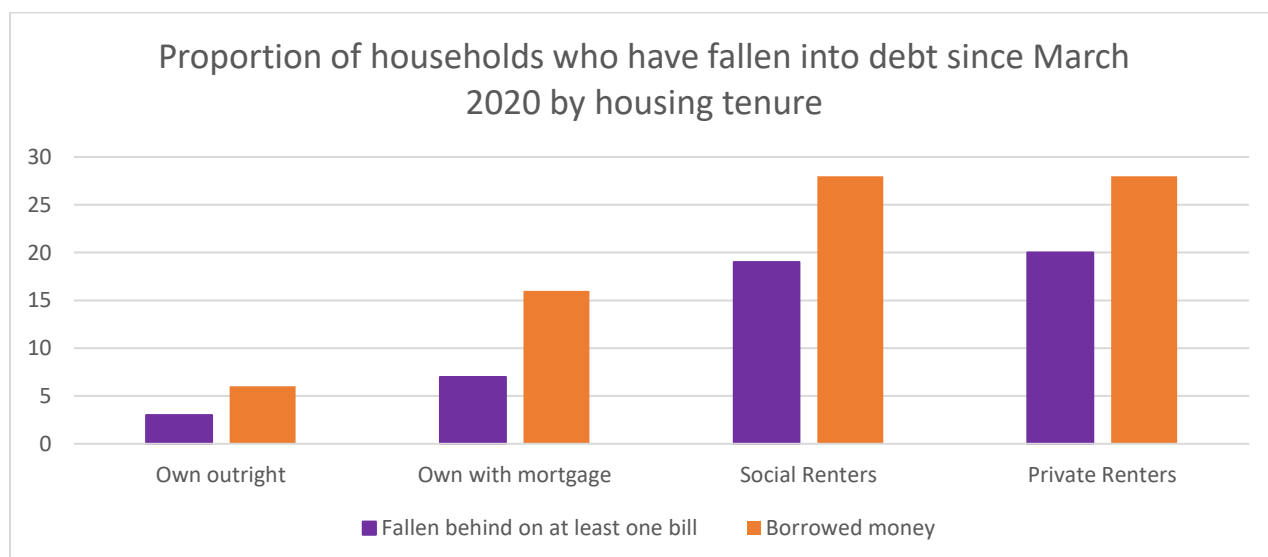


## 4.2 Cutting back and debt

Despite renters and homeowners both being economically affected by the pandemic, renters have overwhelmingly been more likely to have had to cut back on their essential spending.



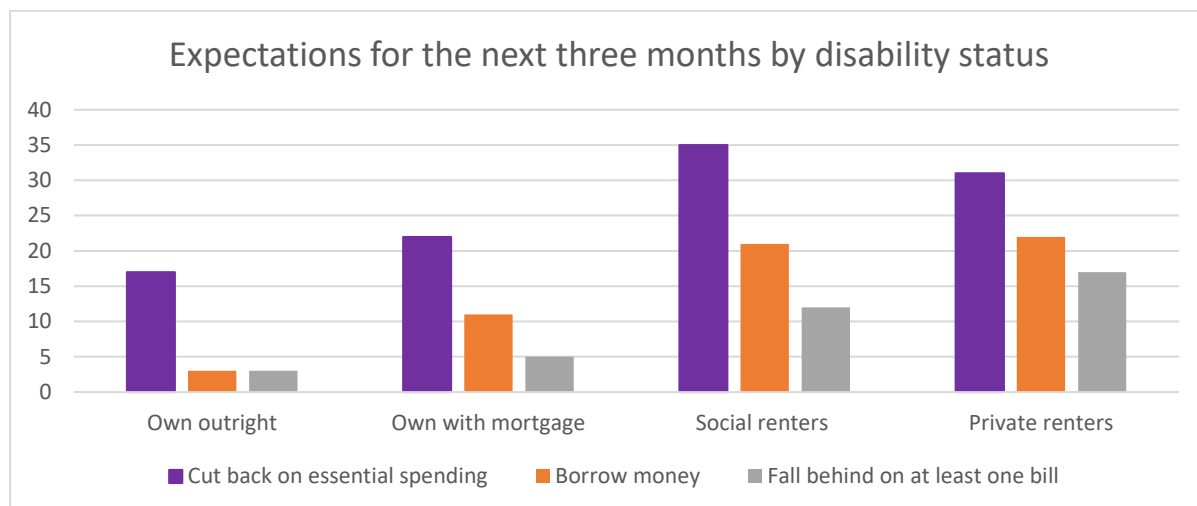
Renters, both in the social and private rental sector have also been significantly more likely to have fallen into debt than homeowners.



The data raises particular concern about households who rent their home from their local authority. A worrying 16% of people who rent their homes for their local authority reported that they have fallen behind on their rent since the outbreak of the pandemic. This is significantly higher than the proportion who rent from housing associations (3%) and private renters (6%).

### 4.3 The next three months

Renters are more fearful about what the next three months may mean for them financially than home-owners. Households who rent their properties from local authorities are especially pessimistic about their financial prospect over the next three months with more than 4 in 10 expecting to have to cut back on at least one bill.

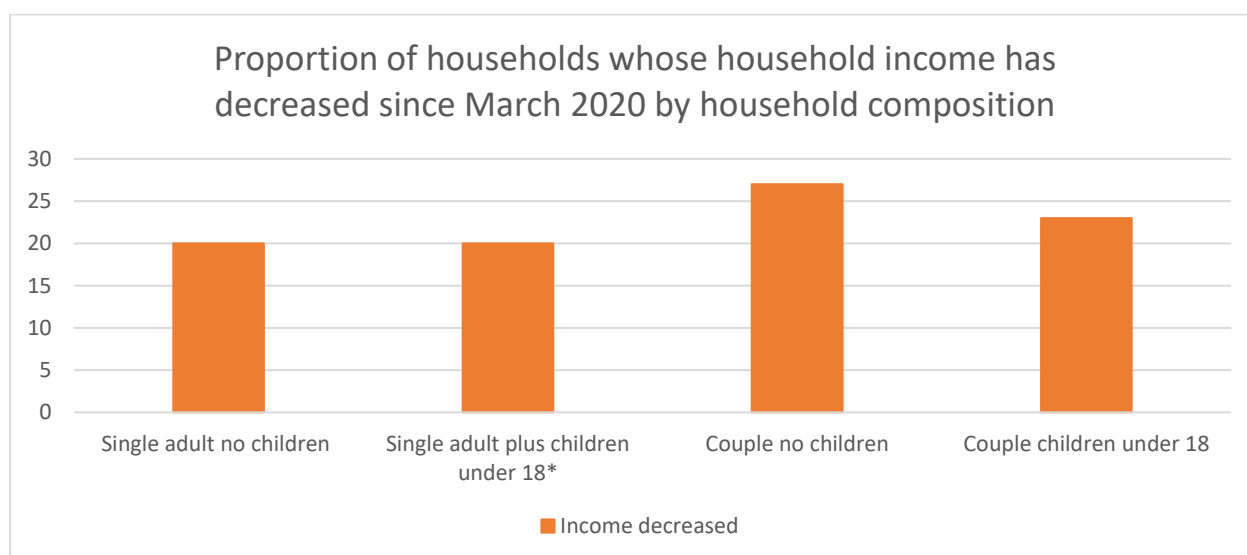


## 5. Gender and household composition

The survey can only provide us with limited insight into the impact of the pandemic on gender. In line with the standard approach to measuring poverty the survey's questions on income focused on household rather than individual income. This means that the survey only provides us with limited insight into whether women's or men's incomes have been most heavily affected by the pandemic. The survey does provide us with some interesting data, however, on the impact of household composition, in particularly around the impact of the pandemic on lone parents.

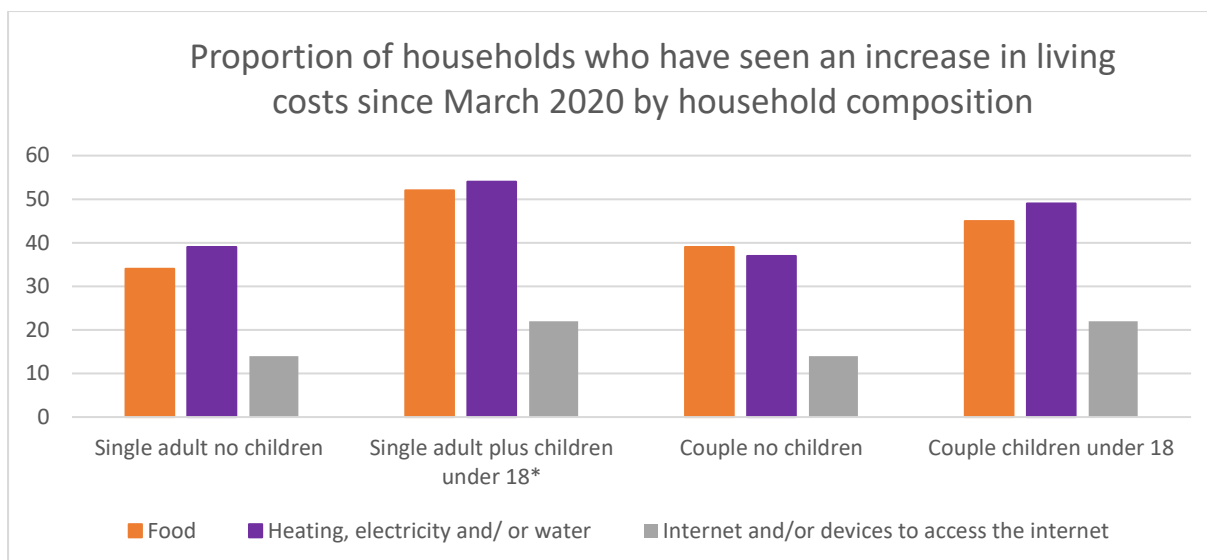
### 5.1 Income and costs

Given that the survey asked respondents about their household income it is perhaps unsurprising that the impact of the pandemic on men and women's household income has been broadly consistent with 25% of men and 23% of women reporting a fall in their household income. Incomes have not fallen equally for all household types, however.



\*Based on a small sample size

Perhaps surprisingly, given the pressures many parents have been placed under due to home schooling it is couple households with no children under 18 living in their home that have been most likely to see their income decrease. Households with children have been significantly more likely to see their living costs increase, however. Lone parents in particular appear to have been badly affected.



\*Based on a small sample size

Interestingly there are some small discrepancies between some of the responses provided by men and women in response to this question. For example, whilst 36% of men reported spending more on food since the outbreak of the pandemic the same was true for 40% of women. One reason for this may be that given that 90% of lone parents are women, the fact that over half of lone parents are having to spend more on food has an impact on women's responses more generally.<sup>9</sup> Another potential explanation may be that, given gendered roles within households, women may be more aware of how much their household is spending on food than men. More research is needed on this however, before drawing definite conclusions.

## 5.2 Cutting back and debt

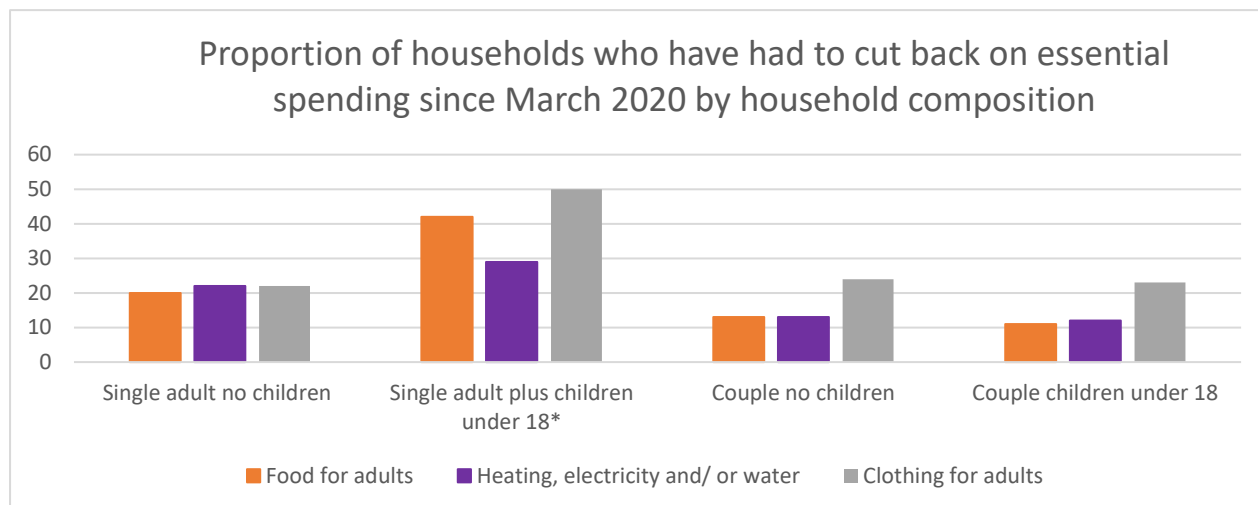
Women appear to have been more likely to cut back on essential items than men due to the pandemic. Whilst 12% of men have reported that their household has had to cut back on food for adults the same is true for 17% of women. An even larger discrepancy appears when looking at clothing for adults, with 18% of men have reported that their household has cut back compared with 26% of women.

Whilst there are some small discrepancies between the experiences of men and women, household composition appears to be a far greater factor. Lone parents households appear to have been hit especially hard. Some caution does need to be taken when analysing the data given the relatively small sample size for lone parents. Given that lone parent households were far more likely to live in poverty in Wales than other household types prior to the pandemic,<sup>10</sup> and that the data has demonstrated that people on low

<sup>9</sup> Gingerbread, *Single parents: facts and figures* (2019) available at - [https://www.gingerbread.org.uk/what-we-do/media-centre/single-parents-facts-figures/#:~:text=In%20the%20UK%3A,single%20parents%20are%20women%20\(iii\)](https://www.gingerbread.org.uk/what-we-do/media-centre/single-parents-facts-figures/#:~:text=In%20the%20UK%3A,single%20parents%20are%20women%20(iii))

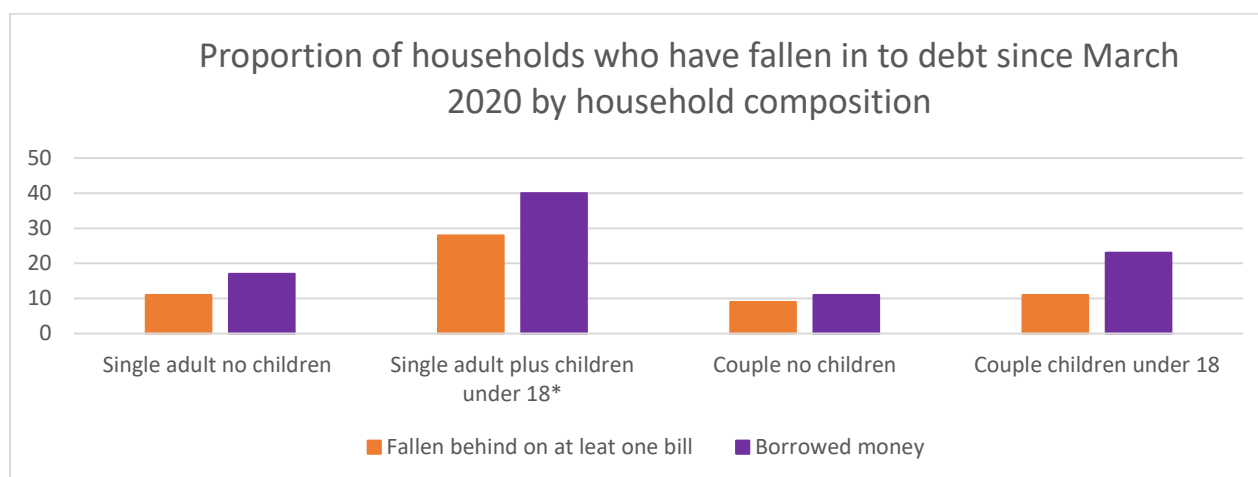
<sup>10</sup> Stats Wales, *People in relative poverty by family type*, available at - <https://statswales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/Poverty/peopleinrelativeincomepoverty-by-familytype>

income have been more likely to have to cut back on essential spending than people on higher incomes,<sup>11</sup> the findings appear consistent with what we might expect to see.



\*Based on a small sample size

Lone parent households have also been significantly more likely to fall into debt since the outbreak of the pandemic.



\*Based on a small sample size

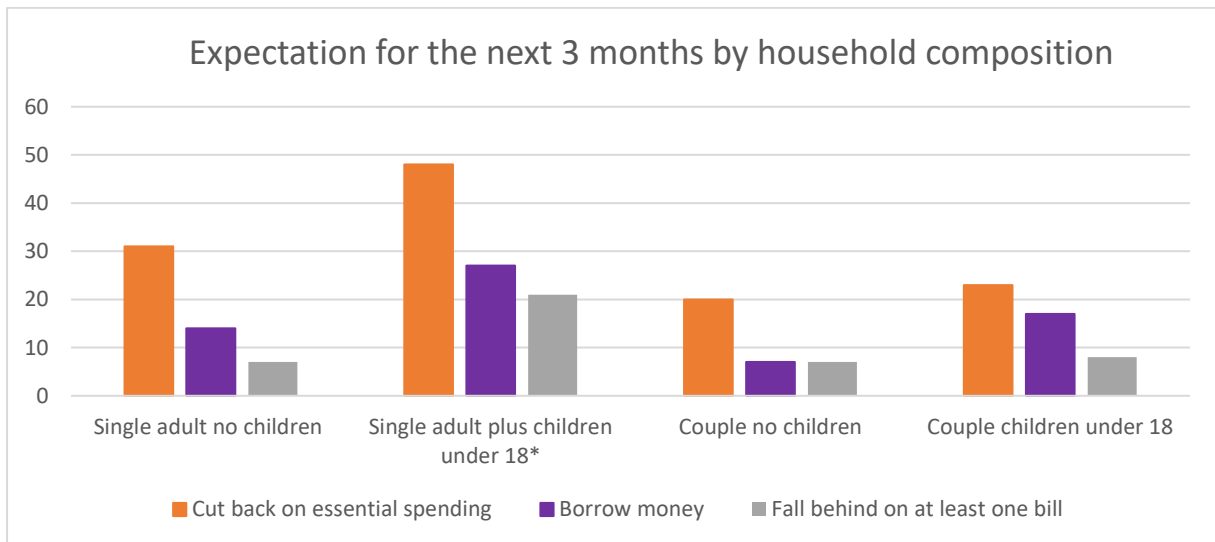
Whilst lone parent households appear to have been hit especially hard by the economic impact of the pandemic, the data does present a more complex picture when it comes to exploring what impact, if any, having children has had on how households have been able to weather the economic storm.

A broadly similar proportion of households that are comprised of a single adult with no children have had to cut back on their essential spending or have fallen into debt, as the proportion of households which are comprised of adult couples with children under 18. The data therefore suggests that whilst having children can increase a household's risk of living in poverty, in part due to higher living costs, the challenge of having to cover numerous living costs from one income is also a factor that can put a household at a higher risk of poverty.

<sup>11</sup> Bevan Foundation n(4)

### 5.3 The next three months

Women do appear more concerned about their financial position over the next three months than men. 24% of women expect they will have to cut back on at least one essential item over the next three months compared with 19% of men. There is no significant variation, however, in the proportion who think they'll have to borrow money. The same is not true by household composition, with lone parent households being especially concerned about what the next 3 months may mean for their personal finances.



\*Based on a small sample size

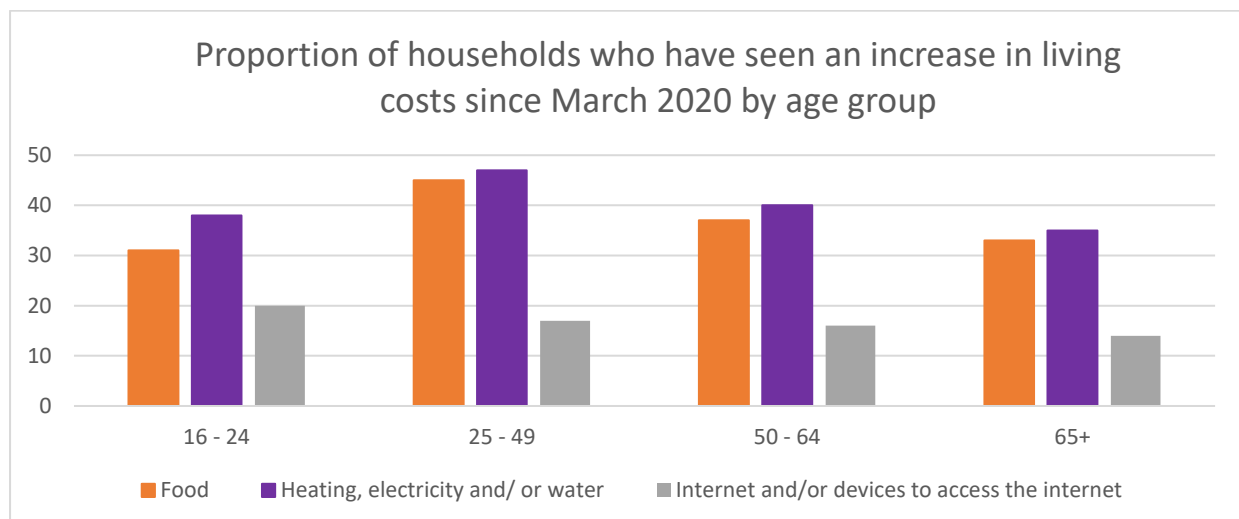
## 6. Age

One of the key features of this pandemic has been its varying impact on different age groups. Older people have been more susceptible to becoming seriously ill or dying from the virus. There is a growing body of evidence that people of working age, however, have been significantly harder hit by the pandemic's economic impact. Our data provides further evidence to support this analysis.

### 6.1 Income and costs

People over 65 have been the least likely to see their income decrease since March 2020. 18% of over 65s have seen their incomes fall since the outbreak of the pandemic compared with 23% of 16 to 24 year olds and 24% of 25 to 49 year olds. It is the 50 to 64 age group that has been by far the hardest hit however, with 31% seeing a fall in their income since March.

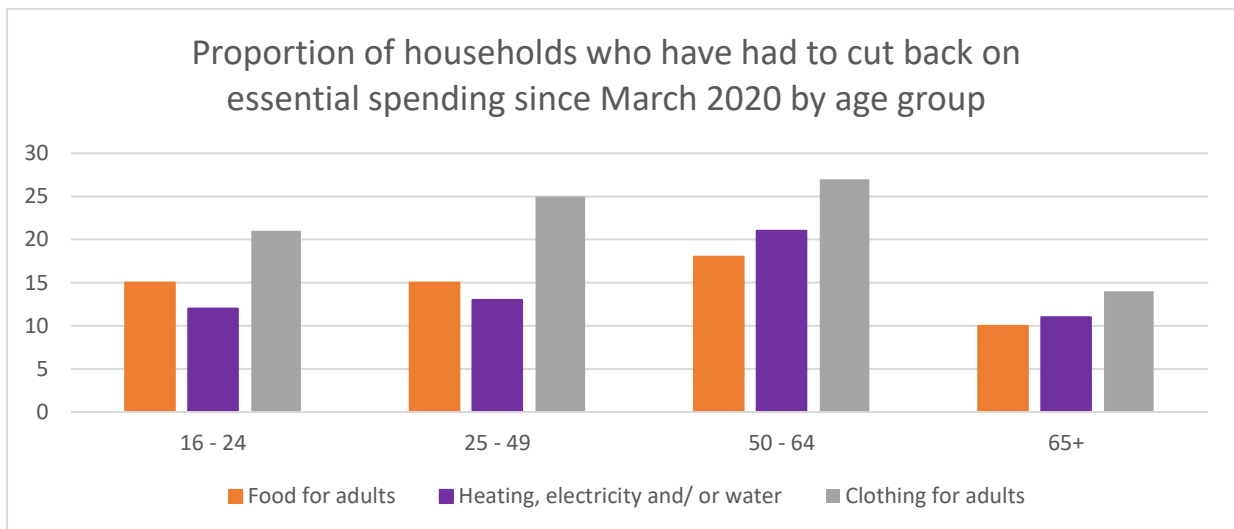
Whilst the 50 to 64 age group has been the hardest hit in terms of incomes, it is the 25 to 49 year old age which has seen the greatest impact on their living costs. This can largely be attributed to a significantly higher proportion of those aged 25 to 49 being parents of children under 18 than any other age group.



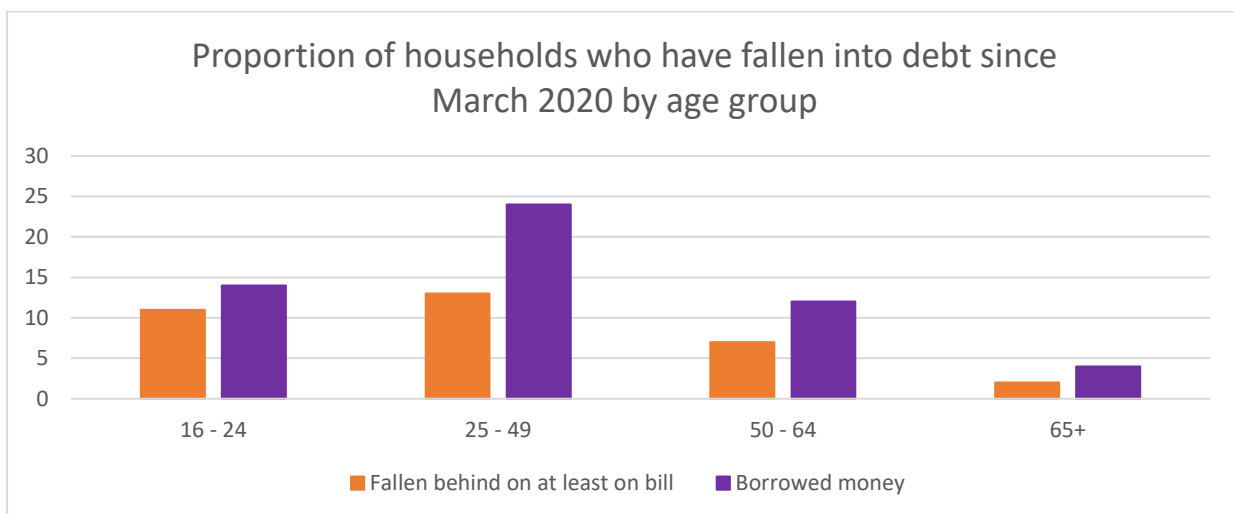
### 6.2 Cutting back and debt

It is not surprising that the proportion of households who have had to cut back on essentials or who have fallen into debt has varied depending on age given the differing impact the pandemic has had on income and costs. The data does point to some interesting differences in people's experiences that may not have been expected, however. This may have some significant implication for the policies that the Welsh and UK Governments should adopt to aid the economic recovery after the immediate threat of the virus has receded.

Those aged between 50 to 64 years old have been more likely to have to cut back on essentials as a result of the economic impact of the pandemic than any other age group.



In contrast, 25 to 49 year olds have been far more likely to fall behind on their bills or to have borrowed money than other age groups.



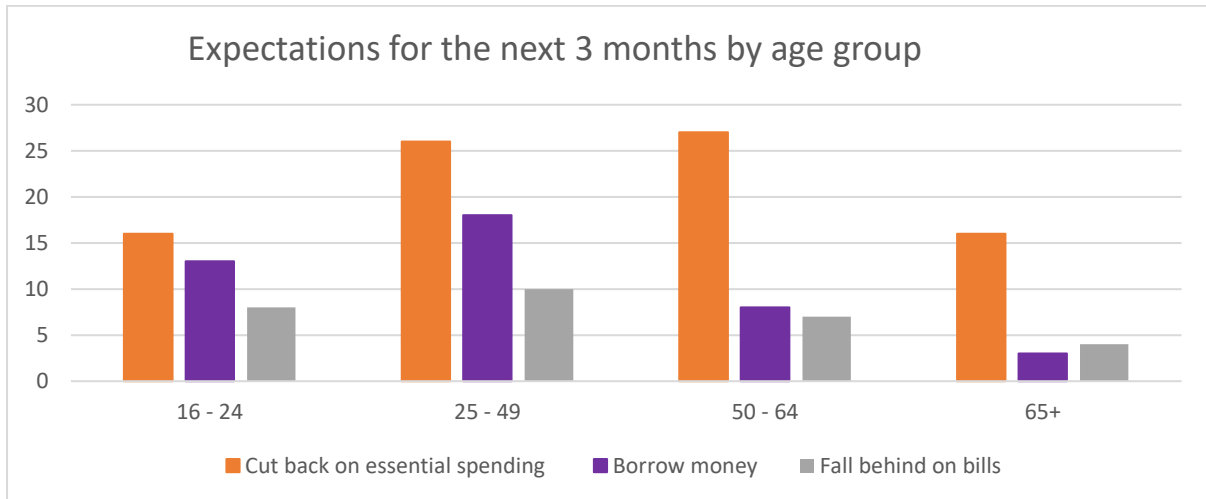
The primary economic impact of the pandemic on 50 to 64 year olds appears to have been on standards of living. While this age group has been significantly more likely to see their incomes fall since March, they appear to have been able to manage this reduction without falling into debt by cutting back on essential items. This suggests that if incomes were to return to pre pandemic levels many 50 to 64 year olds who have struggled financially as a result of the pandemic would be able to enjoy the same standards of living as they did pre pandemic.

The same is not true of 25 to 49 year olds. The pandemic appears to have created a debt crisis within this age group. This means that even if incomes returned to pre pandemic levels in the near future, many in this age group would continue to struggle as they try to service the debt that has been built up over the course of the pandemic.



### 6.3 The next three months

It is not surprising in this context that 25 to 49 year olds appear far gloomier about their prospects over the next three months than other age groups, with nearly 1 in 5 expecting to fall further into debt.



## 7. Ethnicity

The data gathered by YouGov do not allow us to draw definitive conclusions about the economic impact of the pandemic by ethnicity in Wales as the sample size for “Black and Minority Ethnic” (BME)<sup>12</sup> is too small. We will explore whether we can boost the proportion of BME respondents before we rerun the survey later in the year but, the data we have gathered, taken alongside existing evidence does suggest that people from Black, Asian and Minority Ethnic (BAME) communities have been disproportionately affected by the economic impact of the virus.

The recently published Joseph Rowntree Foundation briefing on *Poverty in Wales in 2020* demonstrates that poverty is higher among BAME people, in particular within Black and Asian groups.<sup>13</sup> Given the findings in our earlier briefing that low income households have been significantly more likely to have had to cut back on spending on essential items or to have fallen into debt,<sup>14</sup> this raises concerns about the economic challenges faced by many BAME households.

There is some evidence to suggest that people from BAME groups in Wales have been more likely to work in sectors that have been shut down as a result of lockdown than white people.<sup>15</sup> Whilst the evidence from Wales has been somewhat limited, more extensive evidence has been unearthed highlighting the link between ethnicity and risk of job losses at a UK level. The Joseph Rowntree Foundation, for example, has found that more than 25% of workers from the Bangladeshi community and more than 20% of workers from the Pakistani community work in sectors where there is either at high or very high risk of job losses.<sup>16</sup> By contrast the same is only true for just over 10% of white workers.<sup>17</sup> Similar findings have been reached by the IFS<sup>18</sup> and the Resolution Foundation.<sup>19</sup>

Whilst the small sample size does not allow us to draw any conclusions from the survey, it is reasonable to assume that this has led to a higher proportion of BAME households to see a decline in their household income as a result of being placed on furlough or losing their job. This raises obvious concerns about whether BAME households have been more likely to have to cut back spending on essential items or fall into debt as a result of the pandemic.

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<sup>12</sup> This is the term used by YouGov in the results provided.

<sup>13</sup> Joseph Rowntree Foundation, *Poverty in Wales 2020*, (2 November 2020) available at - <https://www.jrf.org.uk/report/poverty-wales-2020>

<sup>14</sup> Bevan Foundation n(4)

<sup>15</sup> Wales Fiscal Analysis, Cardiff University, *Covid 19 and the Welsh economy: shut down sectors and key workers* (June 2020) available at - [https://www.cardiff.ac.uk/\\_data/assets/pdf\\_file/0009/2409921/Covid\\_economy\\_report\\_1\\_Final\\_rep.pdf](https://www.cardiff.ac.uk/_data/assets/pdf_file/0009/2409921/Covid_economy_report_1_Final_rep.pdf)

<sup>16</sup> Joseph Rowntree Foundation, *Storm ready – how to keep us afloat as the storm hits* (September 2020) available at - <https://www.jrf.org.uk/report/storm-ready-how-keep-us-afloat-unemployment-hits>

<sup>17</sup> *ibid*

<sup>18</sup> Institute for Fiscal Studies, *Covid 19 and inequalities* (June 2020) available at - <https://www.ifs.org.uk/inequality/covid-19-and-inequalities/>

<sup>19</sup> Resolution Foundation, *A gap that won't close. The distribution of wealth between ethnic groups in Britain* (December 2020) available at - <https://www.resolutionfoundation.org/app/uploads/2020/12/A-gap-that-wont-close.pdf>

The data gathered by the JRF and others does raise an important lesson when reflecting on the impact of the pandemic on different ethnic groups. Whilst BAME workers are, in general, more likely to be working in lockdown sectors this is not universally true for all BAME communities. Indian workers are the ethnic group that is least likely to work in lockdown sectors.<sup>20</sup> When considering the relationship between ethnicity and the economic impact of the pandemic therefore, it is important not to view the experiences of BAME communities as one homogeneous experience.

It is not just because of the impact of the pandemic on work that some BAME communities may have been hit especially hard by the economic impact of the pandemic. For example, this briefing has already highlighted the link between housing tenure and the economic impact of the pandemic. Renters have been significantly more likely to have had to cut back on essentials, fall behind on bills or borrow money since March 2020 than homeowners. The fact that people from BAME groups are significantly more likely to rent their home than white people<sup>21</sup> therefore provides another indication that people from BAME groups have been hit harder by the economic impact of the pandemic.

The emerging data as to the economic impact of the pandemic points in the direction of BAME households being more heavily affected than white households. Given that people from BAME groups were already more likely to live in poverty than white people prior to the pandemic there are real concerns that existing inequality has been deepened over recent months.

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<sup>20</sup> JRF n(16)

<sup>21</sup> Bevan Foundation, *State of Wales Briefing, Black Lives Briefing*, (June 2020)

## 8. Conclusion

It is clear that the economic impact of Covid 19 has had a devastating affect on thousands of Welsh households. This briefing note has demonstrated clearly however, that this impact has not affected everyone in Wales universally, with some groups being especially badly hit. The scale of the crisis is such that it is clear that there will be a need for significant intervention from both the UK and Welsh Governments over many years to try and repair some of the damage that has been caused by the pandemic. This briefing note has drawn attention to some important emerging issues that these interventions will have to tackle.

### 8.1 The emerging debt crisis

There are grounds to be very concerned about the rising levels of personal debt since the outbreak of Covid 19. These concerns are especially pronounced for the 25 to 49 year old age group, renters, households with children under 18 and disabled people. The implications of this rising debt are very serious.

In the immediate term, rising levels of debt increase a household's risk of being evicted from their home or being cut off from essential services such as gas and electric. In the longer term, households will have to find enough money to cover their debt repayments whilst also paying for other essentials such as food and their rent. The debt incurred by households since March 2020 could continue to have a real impact on their living standards for years to come.

There are also serious policy implications. Rising eviction levels associated with this debt, for example, will put significant pressure on homelessness services in Wales, whilst some social landlords may see large holes in their finances as a result of tenants building up arrears.

### 8.2 Deepening inequality

The data demonstrates very clearly that the pandemic has not struck everyone evenly across Wales. It is the groups that were already at an economic disadvantage that have been hardest hit. Whilst there is a clear need to take significant interventions to assist people from all sections of Welsh society once attention turns to rebuilding after the pandemic, there is a clear argument for targeting greater resources at providing support and opportunities to people who were already at greater risk of living in poverty long before the pandemic struck. If action is not taken to provide additional support to disabled people, renters, lone parents and people from BAME groups there is a risk that any economic recovery will embed the worsening inequality that has been caused by the pandemic.

### 8.3 Costs and income matter

One of the key features of the data is that whilst incomes have fallen in a broadly similar manner across all groups in society, the same is not true with regards to the proportion who have to cut back on essential spending or who have fallen into debt.

Incomes do matter. As was set out in our December briefing, households on low income have been significantly more likely to have had to cut back on their spending or fallen into debt than higher income households.<sup>22</sup> Given that nearly a quarter of Welsh households have seen their income fall since March 2020, there is a clear need for policy interventions that seeks to counter this, with investment in jobs being a priority. The data suggests that this can only be a part of the solution, however.

As was discussed in the analysis, one of the reasons why disabled people, parents and single people may have been harder hit by the economic impact of the pandemic is that their households have higher living costs, or that their living costs account for a higher proportion of their income. Whilst boosting incomes may ease some of the pressures faced by such households, taking actions to reduce living costs can also have an impact. It is therefore vital as we seek to recover from the pandemic that we consider how we invest in stronger public services so that people have greater access to social housing, good quality and affordable public transport, and suitable childcare.

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<sup>22</sup> Bevan Foundation n(4)

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Life under local  
restrictions

**Policy, Research  
and Advocacy**

## Acknowledgements

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# 1. Foreword

It has been almost a year since the UK went into its first Covid-19 national lockdown. No matter who you are or where you live, you are likely to be feeling exhausted and fed up. For many of us, this has felt like ‘the longest year’.

But the pandemic hasn’t affected us all equally – it has shone a spotlight on inequalities, and made them worse. Our health, income, caring responsibilities, support networks and even where we live have mattered now more than ever.

This research explores the experiences of people and organisations living and working in areas that have been under tighter local restrictions across the UK. In some cases, these areas have never really come out of lockdown.

We wanted to know what it feels like to live under some of the tightest restrictions, particularly for those in vulnerable situations; to understand what support people need; and to find out how well emergency response organisations are coping.

The answers to these questions have important policy implications. While we’re all living under national lockdown right now, we’ve been told to expect the reintroduction of tiered systems in the weeks and months ahead. At the same time, our recovery plans need to account for the fact that some of these communities are at a greater risk of being left behind.

Living under tiered restrictions has, over time, affected people’s livelihoods and mental health. We’ve spoken to people worried about losing their jobs and people who are unemployed and struggling to find work. In some cases, people are facing impossible choices between buying essentials like food, heating, or clothing for their children. A prolonged lack of in-person contact has made others feel lonely and depressed,

made worse by a notable drop in support from friends, family, neighbours and statutory organisations. Some have felt “trapped” and like “prisoners in their own homes”, and many don’t know where to turn to for help.

These experiences are not exclusive to people living under local restrictions, but for those we spoke to, they were being exacerbated by them. The benefits of the easing of lockdown in some parts of the country cannot be overestimated. They’ve provided moments of relief – from celebrating special occasions with loved ones in person to returning to work worry-free.

Those who’ve had few or no moments like this have felt as though they’ve been living in “one extended lockdown”. Over time, it’s become harder to cope. As this research unpicks, it has also led to entrenched feelings of loneliness, poor mental health and growing concerns about what the future holds.

The human impacts of living under tiered restrictions are, of course, not dissimilar to those living under national lockdowns – but the support, information and advice has often felt different by comparison and, ultimately, lacking.

With the UK’s vaccine rollout making strong progress, the end of the Covid-19 crisis is in sight. But we’re not there yet. As we return to a tiered system, whatever that may look like, we need to work together to ensure people are supported to better cope and recover. Like in any emergency, everyone living under Covid-19 restrictions should have access to clear and accessible information, financial support when they need it, shelter, emergency food, psychosocial support and connections. If we don’t get this right, we risk subjecting these communities to worse health, social and economic outcomes now and in the future.

## 2. Recommendations

**We are calling on governments (local and national) to fully meet the humanitarian needs of the individuals and communities most vulnerable to hardship during Covid-19 restrictions, and in recovery, by working with the voluntary and community sector and other industries.**

As in any emergency, everyone living under Covid-19 restrictions should have access to clear and accessible information, financial support, shelter, emergency food, psychosocial support and connections.<sup>1</sup> To achieve this, during an emergency, governments and their partners should:

**Ensure everyone can afford basic essentials, such as food, toiletries, warm clothes, data and heating under Covid-19 restrictions – local or national.** This should be achieved by investing in and promoting discretionary emergency support, such as Local Welfare Assistance schemes, and where possible, using a cash-first approach.

**Prioritise reaching people in the most vulnerable situations so they can access the support they need.** Active outreach should be undertaken by practitioners who provide practical and emotional support, with a focus on reaching individuals not currently in receipt of help, when additional restrictions are put in place in local areas.

**Ensure those with the greatest mental health and emotional needs can access the support they need to cope and recover from Covid-19.** This should include targeting support towards those living alone, the clinically vulnerable and clinically extremely vulnerable, as well as their carers and households.

**Tackle digital exclusion and proactively enable people to connect with others either in-person or virtually.** Government should continue to work with local government, the telecommunications industry, the voluntary and community sector and communities themselves to rapidly address digital isolation. At the same time, policies that allow people to meet outdoors and that allow people from single person households to form support bubbles should continue as long as it is safe to do so.

**Establish effective early warning systems for local emergency response partners,** including local authorities, health bodies, the voluntary and community sector – and specifically the Voluntary and Community Sector Emergencies Partnership (VCSEP) – in areas that are about to enter into new or additional restrictions to better enable an effective and well-planned human-centred response.<sup>2</sup>

**Provide accessible, clear and consistent information about local restrictions at a local and national level.** Government guidance on the rules and restrictions during the coronavirus pandemic should be provided in multiple languages, as standard.

<sup>1</sup> British Red Cross, Ready for anything: Putting people at the heart of emergency response (April 2019) [redcross.org.uk/-/media/documents/about-us/research-publications/emergency-response/british-red-cross-ready-for-anything-report.pdf](https://www.redcross.org.uk/-/media/documents/about-us/research-publications/emergency-response/british-red-cross-ready-for-anything-report.pdf)

<sup>2</sup> We recommend working with the VCSEP as they are developing a new platform that identifies areas of unmet need and where populations may be more at risk in the event of an emergency.

### 3. Introduction & key findings

In July 2020, as part of the UK government's Covid-19 recovery strategy,<sup>3,4</sup> local restrictions were introduced to suppress localised Covid-19 outbreaks in different parts of the country. In the subsequent weeks and months local restrictions began to be applied more widely, and in October 2020 a new system for local restrictions was announced, with the introduction of a three tiered system in England (which was increased to four tiers in December 2020), five protection levels in Scotland, and further restrictions in Wales and Northern Ireland [see Appendix 1].

Since the tiered system was introduced, we have seen waves of restrictions imposed across the UK, with different parts of the country moving in and out of national lockdowns and into different levels of local restrictions. Soon after the existence of a more aggressive strain of the virus was announced at the end of 2020, all four nations of the UK introduced more severe restrictions at a national level, and these are expected to be in place until the virus is brought under control and it is possible to return to a tiered system.

Local restrictions have made it possible to avoid placing a blanket enforcement of restrictions across the whole of the UK, thereby limiting the impact on people and the economy in certain areas. Notably, however, at the time this research was conducted some parts of the country, particularly the Midlands, the North and Scotland, had been under severe restrictions for the majority of the year. This had a number of implications for people in these communities, including on their mental health and financial security, and risks

exacerbating inequalities. Similar to Covid-19 itself, ongoing restrictions have had a greater impact on people in more vulnerable situations, such as those on low incomes, those suffering with physical or mental health conditions, and those from minority ethnic groups.<sup>5</sup>

This research explores the experiences of people living and working in areas of tighter restrictions, so that we can identify better ways to support them to cope and recover from the Covid-19 crisis and ensure they aren't left behind. It adds to the British Red Cross's growing body of evidence around the impact of the Covid-19 crisis on people across the UK, from *Access to food in emergencies: learning from Covid-19*,<sup>6</sup> exploring food insecurity, to *Lonely and left behind: tackling loneliness at a time of crisis*, exploring the experience of loneliness among shielders.<sup>7</sup> These studies also build on our research exploring the needs of people and communities in emergencies pre-Covid-19, such as *Ready for Anything: putting people at the heart of emergency response*,<sup>8</sup> which identified four key themes of need people have in an emergency, including: immediate practical needs (such as food and shelter), mental health and psychosocial support, information and communication as well as advice, support and advocacy.

**Note:** this report is *not* an assessment of the policy of local restrictions themselves (indeed, the need for local restrictions is well documented<sup>9</sup>), but rather an assessment of how we can better support people and communities living under tiered restrictions in future.

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- 3 Department of Health and Social Care, Government's approach to managing local coronavirus outbreaks (July 2020) gov.uk/guidance/governments-approach-to-managing-local-coronavirus-outbreaks
  - 4 Cabinet office, The next chapter in our plan to rebuild: The UK Government's COVID-19 recovery strategy (July 2020) <https://www.gov.uk/government/publications/our-plan-to-rebuild-the-uk-governments-covid-19-recovery-strategy>
  - 5 Department of Health and Social Care, Analysis of the health, economic and social effects of COVID-19 and the approach to tiering (November 2020) <https://www.gov.uk/government/publications/the-health-economic-and-social-effects-of-covid-19-and-the-tiered-approach>
  - 6 British Red Cross, Access to food in emergencies: learning from Covid-19 (July 2020) [redcross.org.uk/-/media/documents/about-us/research-publications/health-and-social-care/access-to-food-in-emergencies-learning-from-covid-19.pdf](https://redcross.org.uk/-/media/documents/about-us/research-publications/health-and-social-care/access-to-food-in-emergencies-learning-from-covid-19.pdf)
  - 7 British Red Cross, Lonely and left behind: Tackling loneliness at a time of crisis (October 2020) [redcross.org.uk/-/media/documents/about-us/research-publications/health-and-social-care/lonely-and-left-behind.pdf](https://redcross.org.uk/-/media/documents/about-us/research-publications/health-and-social-care/lonely-and-left-behind.pdf)
  - 8 British Red Cross, Ready for anything: Putting people at the heart of emergency response (April 2019) [redcross.org.uk/-/media/documents/about-us/research-publications/emergency-response/british-red-cross-ready-for-anything-report.pdf](https://redcross.org.uk/-/media/documents/about-us/research-publications/emergency-response/british-red-cross-ready-for-anything-report.pdf)
  - 9 Department of Health and Social Care, Analysis of the health, economic and social effects of COVID-19 and the approach to tiering (November 2020) <https://www.gov.uk/government/publications/the-health-economic-and-social-effects-of-covid-19-and-the-tiered-approach>

## Summary of key findings

**On the ground, people struggle to distinguish between national lockdowns and local restrictions. This has meant that, for most under local restrictions, lockdown has felt “never-ending”.** Many research participants had stuck with the routines they had begun during the first national lockdown which, for some, meant they continued to isolate at home. This means that some people, and especially the clinically vulnerable and clinically extremely vulnerable, have, in effect, been shielding since March.

**A lack of social contact with others, and the negative impact this is having on people’s mental health, is one of the biggest challenges associated with local restrictions.** The inability to meet with family and friends face-to-face, anxiety about contracting or spreading Covid-19, and an increase in time spent alone is having a detrimental impact on participants’ mental health. Ongoing restrictions have felt particularly hard because many had hoped that once the first national lockdown was over some aspects of their life would get back to normal, and it is difficult seeing this happen to varying degrees in other parts of the country.

**People have been struggling financially under local restrictions.** Those on benefits or low income have struggled with an increase in household bills as a result of staying at home more, and with the costs of essentials, such as food. Others who had recently been made redundant or been placed on furlough were also struggling with a drop in income.

**Those experiencing financial insecurity during local restrictions are broadly unaware of where and how they might be able to access financial support. Those that are aware either feel they will not be eligible for the support on offer even if they are, or have attempted to access this support under local restrictions and found they are not eligible.** This has left participants feeling stressed and has exacerbated their mental health needs.

**Access to both statutory and voluntary support varies depending on how much contact people had with support systems before the Covid-19 crisis.** Among participants who were not receiving support before the pandemic, there is a lack of awareness about where they could go for support, or what options are available in their area. Positively, however, those who were receiving support before the pandemic note how well organisations have adapted their schemes to be socially distanced.

**Some people feel support under local restrictions is less readily available than under the first national lockdown in March.** Many feel that formal and informal support, such as emergency food parcels, community initiatives as well as support from friends, family and neighbours, decreased during local restrictions.

**Many people are reluctant to reach out to organisations for support, particularly those who are struggling with their mental health.** This is due to a number of factors, including: feeling they should be able to cope or that others ‘have it worse’ than them, stigma around mental health problems, reluctance to use certain support channels and a feeling they would not be eligible.

**Due to a lack of information and perceived availability of support, and a reluctance to reach out for help, many feel left alone to manage their own situation.** The findings highlight a number of ways in which statutory bodies and voluntary and community sector (VCS) organisations can better meet people's practical and emotional needs under ongoing local restrictions. This ranges from checking in on people who are self-isolating, to providing better signposting to emergency food and financial support.

**To avoid confusion, people want to have one central and trusted place in which they can access clear and up-to-date information about the local restrictions in their area.** Many participants are confused about the rules and while some participants have found their local authority serves the above purpose, others don't know where this type of information could be found. This confusion has led to some people switching off entirely from accessing information about local restrictions.

**For people that do not speak English as their first language, information regarding the rules around local restrictions is particularly confusing.** Most are not aware of information being available in other languages. While most non-native English speaking participants have a good grasp of English, many still say they have struggled to understand certain aspects of the restrictions, for example the different tiers. This has led to increased anxiety around breaking the rules.



## 4. Our approach

### Objectives

The aim of this research is to explore the experiences of people living and working in areas under additional Covid-19 local restrictions in the UK.

Throughout the qualitative fieldwork, which took place between October and December 2020, a number of significant changes were made to the tiered systems in England and Scotland. There were also periods of national lockdown in England, Wales and Northern Ireland. This research focused on areas likely to have felt the biggest impacts, including: Tiers 2 and 3 in England (the research was conducted before England's Tier 4 was introduced), Level 4 in Scotland, and locations in Wales and Northern Ireland where tougher restrictions were placed on household mixing, travel and what businesses were allowed to open.

Since the research was completed, in early January sweeping national lockdown rules were put in place in all four nations of the UK. These are subject to regular review, and it is broadly accepted that the system of tiers and localised restrictions will be necessary to suppress local outbreaks until the vaccine programme has been fully rolled out and the virus is under control.

To inform our collective response in the coming months, this research provides qualitative and quantitative insight into four areas:

- People's overall experiences of local restrictions
- The general support people require under local restrictions to meet their basic needs (both emotional and practical), and their ability to access this support
- The role of the voluntary and community sector (VCS) in supporting people under local restrictions
- The reach, clarity and quality of information and communication around local restrictions (as perceived by both members of the public and local organisations)

### Methodology and sampling

This research was conducted using a mixed methods approach, and the findings in this report are based on data from three stages of fieldwork:

- 23 in-depth interviews conducted over Zoom or telephone with members of the public (November-December 2020) [See Figure 2]
- Six in-depth interviews conducted over Zoom or telephone with professionals who played a key role in supporting communities under local restrictions, such as those from VCS organisations, health organisations and local authorities (November-December 2020)
- UK-wide nationally representative polling of 2,000 adults, as well as a boost to 504 adults in Wales, 500 adults in Scotland and 253 adults in Northern Ireland (fieldwork was conducted from 8 to 22 December 2020)

In particular, we set out to capture the experiences of those most vulnerable to the impact of local restrictions and Covid-19.<sup>10</sup> For this reason, we aimed to recruit a range of people, including those who were classed as clinically vulnerable or clinically extremely vulnerable; those who felt Covid-19 was negatively impacting their mental health; those on no or low income or on income support; and people from black, Asian and minority ethnic backgrounds.

Participants were recruited through a variety of channels, including through British Red Cross services and initiatives such as the British Red Cross support line, the Lived Experience Advisory Group and the VOICES Network.<sup>11,12</sup>

<sup>10</sup> For information regarding the limitations on reaching the most vulnerable during this research, see Page 9.

<sup>11</sup> The LEAG (the Lived Experience Advisory Group) is a group of people from across the country drawing on their own personal experiences to help shape the British Red Cross's coronavirus response, so that our services are inclusive, accessible and reach the people who need them most.

<sup>12</sup> The VOICES Network, supported by the British Red Cross, is a nationwide association of people with refugee backgrounds providing a platform on which to share the challenges they face and raise those issues to decision-makers.

**Figure 1: Fieldwork locations and local restrictions in place at time of interview**

Nation	Area	Restriction level <sup>13</sup>
England	3 x Leicester 2 x Birmingham 5 x Greater Manchester 2 x Liverpool 3 x London 1 x County Durham	8 x Tier 2 8 x Tier 3
Scotland	4 x Glasgow	Level 4
Wales	1 x Swansea 1 x Cardiff	Limit on gatherings, travel restrictions, and curfew in place
Northern Ireland	1 x Derry~Londonderry	Heightened restrictions in Derry~Londonderry including closure of businesses

We also recruited through a research partner Roots Research in order to help us reach people who were not receiving support.

Qualitative fieldwork was conducted across all four nations of the UK, and participants were recruited from a spread of areas under additional local restrictions. As restrictions in England have affected the North and the Midlands much more heavily than the South of England, the sample was weighted towards those living in the North (as shown in Figure 1).

An overview of the participant sample is provided in Figure 2.

In addition to the above, we also ensured the sample included a good spread of:

- Working status
- Length of time under local restrictions
- Financial impact as a result of Covid-19

Towards the end of the project we also conducted two workshops with the British Red Cross's Lived Experience Advisory Group and the VOICES network of refugees and people seeking asylum, to incorporate their feedback on the findings and recommendations.

### Research limitations

While the sample criteria and recruitment channels used in this research were designed to include those who are most cut off from support as a result of local restrictions, by their very nature the restrictions meant these people were particularly difficult to reach. Recruitment channels for this type of research would ordinarily ideally include an element of on-street or community recruitment, however for this research, we largely had to recruit via telephone, online or through existing networks. This meant participants were less likely to be those who were digitally isolated or cut off from any level of support network (though some in our sample fell into these categories).

While this research captures powerful stories of people who are under financial and emotional distress as a result of local restrictions, we know there are many more people who will be facing similar challenges in even more difficult circumstances, such as those experiencing greater digital and social isolation and those experiencing homelessness, who we weren't able to interview. Future research and strategy should ensure people particularly cut off from support are at front and centre.

<sup>13</sup> At time of fieldwork between 11 November and 17 December, excluding the period of national lockdown in England between 5 November and 2 December.



**Figure 2: Summary of participant criteria**

Criteria	Participant sample
Age	3 x 16-24 4 x 25-34 9 x 35-44 3 x 45-54 2 x 55-64 2 x 65+
Gender	9 x Male 14 x Female
Ethnicity	10 x English/Welsh/Scottish/Northern Irish/British 2 x Black Caribbean 4 x Black African 3 x Asian Pakistani 1 x White and Black Caribbean mixed 2 x Arab 1 x Mixed/ Multiple ethnicities
Living situation	6 x Living alone 6 x Living with children under 18
Caring responsibilities	2 x Unpaid carers for family members
Vulnerability	12 x Physical health condition 4 x Mental health condition 5 x Clinically extremely vulnerable/ told to shield 4 x Clinically vulnerable 5 x Refugees and people seeking asylum

## 5. The impact of local restrictions on day-to-day life

### Impact of local restrictions on people's behaviour and routine

#### Perceptions of local restrictions as a continuation of national lockdown

Under local restrictions many of those we spoke to continued to limit their in-person interaction with friends and family. Participants continued to cut down on the activities they were doing prior to the first national lockdown, even where these were allowed under local restrictions. Many were spending most of their time inside their own homes, with a couple of participants choosing to isolate entirely.

Most people we spoke to had resumed supermarket shopping and exercising outdoors without too much difficulty, although this had become harder as the weather got colder. However, despite the removal of some restrictions, many were still reluctant to meet up with certain friends or family and had not ventured out to pubs and restaurants or been to entertainment venues. The fact that local restrictions continued to be implemented indicated to them that there was still a significant risk to their own health and to their loved ones. Many were, therefore, staying at home to minimise their risk of contracting Covid-19.



To be honest, every time they've changed it hasn't really affected us, because we've been acting like we're in the harshest restrictions anyway.

**Male, 55-64, Bolton**

One participant, his wife and two sons, one of whom has cerebral palsy, had been isolating throughout the Covid-19 crisis. While they did not receive a letter to confirm that his son was clinically extremely vulnerable, cerebral palsy is included on the list of clinically vulnerable conditions so they made the decision to shield themselves to avoid any of their family members contracting Covid-19

and passing it on. While they had allowed a small number of carers back into the house, they were trying to limit contact with others outside the home as much as possible, and were spending almost all of their time at home.

One professional, working in Leicester, had also observed this happening, and expressed concern that it may take some time before people felt safe to start mixing with others more regularly, even from a safe distance. She highlighted that this could have a substantial negative impact on people's wellbeing in the longer-term.

Much like during national lockdowns, many mentioned that their days lacked structure, and they regularly felt trapped inside. This added to the sense that the impact of Covid-19 was never-ending, and contributed to higher levels of anxiety and depression among participants.

As a result, for many of those we spoke to there was little differentiation between national lockdown and local restrictions, particularly for those living under the tightest restrictions. When asked, most people struggled to remember when their area had gone into local restrictions. Confusion between national lockdowns and local restrictions was common, particularly when it came to what they could and couldn't do. This made some people feel like they had been under one long lockdown since March 2020.



It just feels like one big lockdown.

**Male, 16-24, Leicester**

#### Limiting activity for fear of "doing the wrong thing"

Some participants felt it was better to continue to live as if they were under the strictest restrictions due to a confusion around local restriction rules and a fear of 'doing the wrong thing'. This was also reflected in the polling, where three quarters



**74% of UK adults** said that they find it easier to limit how much they leave their home than to keep up with changes to coronavirus restrictions

Source: UK-wide nationally representative polling (8 to 11 December 2020).

of adults said they found it easier to limit how much they leave their home, rather than keep up with changes to coronavirus restrictions (74 per cent).

One student in London became very isolated when the Tier 2 local restrictions were first implemented as she was confused about what she could and couldn't do. She therefore tried to stay in as much as possible and do the bare minimum outside of her studies, for fear of breaking the rules.



I've been trying to stick to doing the bare minimum. Going to my classes and then coming back to my room to study, eat and sleep.

**Female, 16-24, London**

For many, this approach has meant they have missed out on face-to-face interactions and informal support from family and friends, which in turn has had a detrimental impact on their mental health (see Chapter 6).

### Having little or no social interaction

Having limited interactions with people outside their household, as well as not being able to meet with friends or family indoors, particularly as the weather worsened, had been difficult for most people we spoke to.

Some felt that their communication with friends had decreased slowly or stopped entirely since the initial national lockdown. While many continued to keep up with friends over the phone or through social media, and a few participants were keeping up with online activities such as Zoom calls and online quizzes with friends and family, for most, the frequency of these interactions had started to fizzle out. Even where such interactions had

continued, there was general agreement among participants that online communication was not as satisfying as in-person interactions. Some participants mentioned having felt unable to help friends who were struggling with their mental health as a result of the restrictions.



It's hard to have conversations over the phone with people when you can't even be with people to help them.

**Male, 25-34, Leicester**

While some of those who had attended social or community groups before the Covid-19 crisis had continued to attend these sessions online, others, particularly those who weren't previously involved in local activities, were reluctant to take part in these opportunities. This was often due to a perception that online did not offer the same level of support.

Most participants said a lack of social interaction was the thing they found hardest under local restrictions. The importance of face-to-face interactions for people's health and wellbeing came out strongly, even where it is socially distanced and outside.



To not be able to meet people, that has been a challenge for me. I'm still able to go shopping, I'm still able to take the boy to play outside and he can go to school. It was a big challenge when the schools were closed in the first lockdown – he was not coping well, we were really struggling.

**Female, 35-44, Swansea**

## Impact of local restrictions on practical needs

### Buying food and other essentials

While there is much evidence to show that Covid-19 has negatively impacted people's ability to access food and other essentials,<sup>14,15,16,17</sup> for the most part those who participated in the interviews were eventually able to obtain essentials like these under local restrictions, either by going to the shop themselves, shopping online, relying on informal networks to help or accessing formal support. Though some, particularly those with no close support networks, said it had been a challenge to do so.

Many participants had, however, experienced serious financial constraints under local restrictions (see Chapter 7), which had occasionally prevented them from being able to afford food.

Those who were clinically extremely vulnerable had for the most part also been able to meet their practical needs under local restrictions, through shopping online or making use of schemes such as Carer's cards and priority delivery slots.

One participant had received a Carer's card<sup>18</sup> during the national lockdown from a group he attended before the Covid-19 crisis, which he had been able to use during local restrictions. This ensured he was able to skip the queue at his local supermarket. Knowing he could shop quickly made things a lot easier when he had his mum in the car when he went shopping, or when he left his mum with someone.

Another participant who works as a housing manager at a homeless shelter struggled to buy food for those at the centre due to a limit being placed on buying goods in bulk, such as toilet paper. This had meant that buying shopping was now taking much longer than it used to. He and his colleagues had to go into the supermarket separately so that they could each buy a handful of items needed at the centre.



It now takes a day just to organise the shopping.

**Male, 45-54, Cardiff**

The participant thought it would be helpful to allow people working for places like homeless shelters and food banks to buy in bulk to avoid the logistical challenges of maintaining a sufficient supply for those who most need it.

### Medical appointments

Many participants had been happy with the service they had received from their GP and other healthcare professionals during local restrictions. At the time of fieldwork, research participants who had long-term health conditions were able to access what they needed under local restrictions, such as accessing prescriptions, routine appointments, and referrals for e.g. blood tests.

One participant mentioned that, since his GP appointments moved to being remote, he had been able to get appointments much more quickly. However, not being able to see his GP in person made him unsure of whether certain issues with his health would be picked up, as he felt they had been unable to assess him as well as they would have done face-to-face.

14 British Red Cross, Access to food in emergencies: learning from Covid-19 (July 2020) <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/access-to-food-in-emergencies>

15 British Red Cross, Life after lockdown: Tackling loneliness among those left behind (June 2020) <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/life-after-lockdown-tackling-loneliness>

16 Rachel Loopstra, Aaron Reeves, Hannah Lambie-Mumford, COVID-19: What impacts are unemployment and the Coronavirus Job Retention scheme having on food insecurity in the UK? (September 2020) [foodfoundation.org.uk/wp-content/uploads/2020/09/BriefReport\\_Unemployment\\_v5.pdf](https://www.foodfoundation.org.uk/wp-content/uploads/2020/09/BriefReport_Unemployment_v5.pdf)

17 Independent Age, Home Truths: Experiences of people in later life during COVID-19 (December 2020) [independentage.org/campaigns/covid-survey](https://www.independentage.org/campaigns/covid-survey)

18 A Carer's card is a form of identification for people who are providing unpaid support to another person. Many organisations and local authorities offer these cards and they can come with benefits such as discounts and concessions.

## Chapter Summary

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People continued to limit their interactions with others, even where the rules allowed it. This was, in most cases, due to an ongoing fear of contracting Covid-19. However, for some it was rooted in a lack of understanding about the rules and a fear of doing the wrong thing.

Little face-to-face interaction was cited as the hardest thing about living under local restrictions and national lockdowns, and participants valued even limited opportunities to see people from other households outside. Given that parts of the UK have been under tighter Covid-19 restrictions since March 2020, in many cases participants had been having no or very limited contact with others for eight or nine months, and this was negatively impacting their mental health.

While participants sometimes had difficulty accessing the food, essential supplies and medical support they and their families needed, they were mostly able to do so through formal and informal support networks. However, as explored later, financial pressures have impacted people's ability to afford essentials.

Recommendations to address these issues are explored further in the following chapter on mental health and wellbeing.



## 6. Mental health & wellbeing under local restrictions

### Impact of local restrictions on mental health

Local restrictions had taken a negative toll on the mental health of most people we interviewed. This was also reflected in our polling where, of the 10 per cent who said they were not confident they could cope or recover from changes to their life caused by the Covid-19 crisis, mental health was the main reason provided (71 per cent).

Most people who participated in the interviews, whether they had a pre-existing mental health condition or not, talked of feeling down. Living under some form of restrictions for eight to nine months felt “never-ending” for many, leaving them increasingly tired and weary. Some mentioned that, unable to continue with many of the activities they had done before the Covid-19 crisis, they often experienced feelings of boredom and the monotony of their routines under local restrictions had left them feeling fed up.



I feel like you do the same thing without fail daily. You wake up, do your work, you stop, you watch TV, you go to bed, you rinse and repeat. You can't do much when you go out. It's all just sit indoors. It's like prison in a way.

**Male, 25-34, Leicester**



Mentally [I'm] worn down, but I think that's pretty much the same for everybody . . . It just grinds away. I used to wake up every day and go 'What will I do today'. And now it's 'Oh god, another day of this'.

**Male, 35-44, Glasgow**

A significant proportion also referenced feelings of anxiety and depression, and said they were struggling somewhat with their mental health. Many people mentioned they had felt lonely or socially isolated in the past few months. Some brushed this off as “inevitable” given the lack of social interaction under local restrictions.



I have felt quite lonely at times, but I think that's inevitable.

**Male, 55-64, Derry~Londonderry**



Sometimes I go in depression, I'm depressed, sitting at home is not easy. I also miss the community gatherings.

**Female Refugee, 45-54, Leicester**

### Living alone

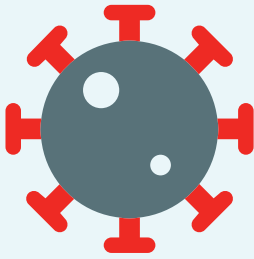
For those living alone, the impact of being on their own for long periods was having a negative impact on their mental health. One participant had started struggling with her sleep as a result of increased anxiety and depression from being alone and having lots of time to overthink. Similarly, others living alone mentioned feeling “like a prisoner” in their own home.



I feel quite isolated. It can feel quite isolating, I have to get out just to see other faces.

**Female, 45-54, Birmingham**

## UK Polling Data: Coping with the impact of Covid-19



One in five adults (19%) said that emotional support would have been helpful to them during local restrictions (whether they had gone on to access this support or not).

While the majority of UK adults (66%) said they are **confident they can cope with changes to their life that may be caused by the Covid-19 pandemic, and that they will be able to recover afterwards**, a significant minority of 10% disagree.

People with a disability are more likely to feel they cannot cope (16%) compared to those without a disability (8%), as are females (13% say this, compared to 7% of males).

We asked people who said that they are **not confident in being able to cope why they were feeling this way**:

**71%**

said that their **mental health** was contributing to them feeling this way

**62%**

said **missing friends or family** was a contributing factor

**60%**

said a **lack of social contact** was a contributing factor

**44%**

said **household finances** were a contributing factor

UK adults' ability to cope with the impact of Covid-19 has not changed significantly since October 2020, when British Red Cross ran similar research. In October, we found that **those who feel always or often lonely are more likely to feel they cannot cope with changes to their life caused by the Covid-19 pandemic** (39% said this compared to 12% of all UK adults).

Source: UK-wide nationally representative polling (8 to 11 December 2020).



I just get into a state of overthinking . . . especially with not getting outside and using any energy . . . I have anxiety and depression anyway and so with the restrictions it's just heightened.

**Female, 25-34, Manchester**

In parts of the UK single household support bubble rules have been in place, allowing two households to link up and act as if they are one household. These bubbles were hugely appreciated by participants living alone. Some reflected that even if support bubbles were not in place, they might have been tempted to break the rules to improve their mental health. However,

knowing this was within the law made them feel more comfortable about seeing others in person and made these interactions less complicated and thus more enjoyable.

### **Living with and caring for people who are clinically vulnerable or extremely clinically vulnerable**

Alongside those living alone, interview participants who were caring for others were most likely to report feelings of depression, loneliness and isolation, with some saying it had impacted them on a day-to-day basis. Participants in this group had tended to continue limiting their activities and interactions due to the fear of them or their loved ones contracting Covid-19, particularly when they had been classed as clinically vulnerable or clinically extremely vulnerable to Covid-19.



One participant, who was caring for his elderly mother who had been told to shield during the first lockdown, had become very isolated. During the local restrictions, his mother had still been very reluctant to go out or allow other people into the house due to her fear of contracting Covid-19. This meant he was spending much more time indoors caring for her without respite, and both of them felt that their mental health had deteriorated as a result. He said he felt lonely and isolated.



My mum is over 70 so the fear factor has been a major thing for her. It was on the news all the time about how many people over 70 were dying . . . it's led to her being fearful of going out. She doesn't want anyone in the house and she is very conscious of who is coming over . . . I feel stuck at home . . . isolated.

**Male, 35-44, Birmingham**

### **Mental health among refugees and people seeking asylum**

In the interviews we held with people seeking asylum, as well as the recommendations workshop we held with VOICES network ambassadors, the issue of mental health came out strongly. They told us how difficult it has been living in isolation and being unable to access their usual support networks.

One person seeking asylum also said mental health support available for this group was insufficient, despite need being high. Refugees and people seeking asylum are five times more likely to experience mental health problems than the general population, including post-traumatic stress disorder and depression, and 61 per cent of people seeking asylum experience serious mental distress.<sup>19</sup>

### **Fur and Furlough**

**A poem by VOICES Ambassador  
Walid Marmal, who is seeking asylum  
in the UK**

*I want to follow the rules and stay home  
And not put more pressure on the NHS  
But alas, I don't have a home  
I only have a cabin, or less*

*Social distancing is my status quo  
Since I have no family or friends  
Everyday I just go with the flow  
And wait to meet my ends*

*This draconian system has torn me down  
And left my soul dull and arid  
Now I can't care less about the lockdown  
Or all the fuss about the Covid*

*Living on £37 a week  
Is the memory of the good old days  
Now I have no allowance to seek  
Like a church mouse who erratically strays*

*My summer shoes are damp and old  
And charity shops have shut their doors  
Three pairs of socks won't halt the cold  
Nor the frostbite that numbs my toes*

*I dream to have a fur coat and fur shoes  
A house, a kitchen, with lots of dough  
And on some weekends make BBQs  
And be like people with fur and furlough*

<sup>19</sup> Mental Health Foundation, Fundamental Facts About Mental Health (2016) <https://www.mentalhealth.org.uk/publications/fundamental-facts-about-mental-health-2016>

## Chapter Summary & Recommendations

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Both the qualitative and quantitative strands of this research suggest the biggest impact of living under local restrictions is on people's mental health. This was for a combination of reasons, including boredom, frustration, worries about the virus and financial concerns. However, the most common triggers were isolation and feelings of loneliness.

While people of all ages and from all backgrounds had seen an impact on their mental health, those living alone, those who were clinically vulnerable or clinically extremely vulnerable, and those caring for others felt particularly isolated and despondent.

A number of participants also mentioned how much they valued single household support bubbles, describing them as "a lifeline".

### We recommend:

- **Governments across the UK should ensure local health systems have the capacity, resources and skills to meet the mental health and emotional support needs of those most at risk. This should include those living alone, the clinically vulnerable and clinically extremely vulnerable, as well as their carers and others in their household.**
- **Governments should support local authorities to provide advice and information about how to overcome loneliness and support friends and family members that may be struggling emotionally. This should always be published alongside communications and correspondence about restrictions that are in place locally, and should include information about support available in the local area.**
- **Emergency response partners, including local authorities, the NHS and the voluntary and community sector, should work together to offer psychosocial support, including support with loneliness, to anyone being advised to shield, take extra precautions or self-isolate.**
- **Government departments should work together to attach psychosocial support to other public services that are likely to encounter those most in need (such as those accessing mainstream benefits, and local authority emergency food support).**
- **Governments should ensure that local restrictions guidance continues to allow support bubbles for single person households, and meeting an individual from another household outdoors, as long as it continues to be safe. These exceptions should be promoted clearly in guidance and wider communications to ensure people do not restrict themselves from permitted interactions that could have significant benefits for their mental health.**

Recent British Red Cross reports have explored experiences of loneliness in the UK as a result of Covid-19. You can access these reports for further recommendations on how to address loneliness.<sup>20</sup>

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<sup>20</sup> British Red Cross, *Lonely and left behind: Tackling loneliness at a time of crisis (2020)* <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/lonely-and-left-behind>. British Red Cross, *Life after lockdown: Tackling loneliness among those left behind (2020)* <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/life-after-lockdown-tackling-loneliness>.

## 7. Financial security under local restrictions

### Growing financial hardship across the UK

The negative impact of Covid-19 on financial security across the UK has been widely reported. A study conducted by Citizens Advice in August 2020 highlighted the rising levels of debt faced by approximately 6 million adults, or 9 per cent of the UK adult population.<sup>21</sup> This number includes many people who were in a precarious financial situation before Covid-19, but who have been pushed into significant financial hardship as they have fallen behind on household bills.<sup>22</sup>

This situation is likely to worsen as the cumulative economic impacts of ongoing Covid-19 restrictions continue to grow. The figures are stark: in the last quarter of 2020 the employment rate fell sharply, while unemployment rose sharply in the three months to October.<sup>23</sup> As of November, there were 819,000 fewer workers on UK company payrolls compared to February 2020,<sup>24</sup> and by the end of October 2.4 million workers were still being supported by the furlough scheme.<sup>25</sup>

With over 720,000 additional people having been pushed into poverty between April and June 2020, I-SPHERE estimates that approximately 670,000 additional people would have been pushed into destitution by the end of 2020, and an additional 424,000 by mid-2021.<sup>26</sup> This would be due to a combination of rising unemployment, additional waves of Covid-19 and subsequent restrictions, EU exit, and recession. Already, there has been a significant increase in the number of people supported by the welfare system across the UK, with the number of Universal Credit claimants having increased dramatically between February and November, from 2.9 million to 5.8 million.<sup>27</sup>

Our UK polling has shown that the overall need for financial support during local restrictions, whether in the shorter or longer-term, has been higher among younger people, with one in five aged 34 or below saying that financial support for essentials such as food, clothes and toiletries would have been helpful to them during Covid-19 local restrictions (see polling data on page 25). It is worth flagging, however, that this was an online methodology and the data does not account for severity of need. A full investigation into experiences of financial need among different age groups under Covid-19 would therefore be beneficial.

Further data is needed to confidently say whether local restrictions have compounded the economic impact of Covid-19 on people and places. However, through this research we reached many of the groups that are most likely to be impacted by financial insecurity during Covid-19, such as families and lone parents, people with long-term health conditions or disabilities and ex-prisoners (see Figure 3).

21 Citizens Advice, Excess debts - who has fallen behind on their household bills due to coronavirus? (August 2020) <https://www.citizensadvice.org.uk/about-us/policy/policy-research-topics/debt-and-money-policy-research/excess-debts-who-has-fallen-behind-on-their-household-bills-due-to-coronavirus/>

22 Ibid.

23 ONS, Coronavirus roundup: Economy, business and jobs (10 December 2020) [ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsanddiseases/articles/coronaviruscovid19roundup/2020-03-26#economy](https://ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsanddiseases/articles/coronaviruscovid19roundup/2020-03-26#economy)

24 Ibid.

25 Brigid Francis-Devine, Andrew Powell and Niamh Foley, Coronavirus: Impact on the labour market (December 2020) <http://researchbriefings.files.parliament.uk/documents/CBP-8898/CBP-8898.pdf>

26 Trussell Trust, Lockdown, lifelines and the long haul ahead: The impact of Covid-19 on food banks in the Trussell Trust network (2020) <https://www.trusselltrust.org/wp-content/uploads/sites/2/2020/09/the-impact-of-covid-19-on-food-banks-report.pdf>

27 Department for Work and Pensions, Universal Credit statistics: 29 April 2013 to 12 November 2020 (December 2020) <https://www.gov.uk/government/statistics/universal-credit-statistics-29-april-2013-to-12-november-2020>

### Figure 3: Most vulnerable groups to financial insecurity during Covid-19 crisis

Financial insecurity during the Covid-19 crisis particularly affects<sup>28,29</sup>:

- social care workers
- men in the lowest-paid occupations
- renters
- homeless people
- those without bank accounts, such as ex-prisoners or those with insecure immigration status
- self-employed people
- families and lone parents
- those with no recourse to public funds
- people with long-term health conditions/disabilities
- people living in debt or without savings
- people working in vulnerable sectors including accommodation, hospitality, arts, entertainment, recreation and retail.

For many of the people we interviewed, the impact of local restrictions on their financial security had been significant. Some had struggled with an increase in household bills, while others were dealing with recent redundancy or reduced income. These challenges were a cause of much stress and anxiety for them.

A number of the professionals we spoke to also highlighted their concerns regarding the impact of ongoing local restrictions on financial insecurity, particularly in areas where they have been in place longest, such as in the Midlands, the North of England and Scotland. This has led to a sharp increase in demand for both financial and community support.



The financial insecurities for people are significant as a result of [the ongoing restrictions] and the impact of them. You've got families that are hungry, you've got children without winter coats, you've got families deciding whether they put a nappy on their children or feed them. We had a family that was a mum and dad and six children, and it worked out that they were living on 70 pence a day.

**Professional, British Red Cross**

While professional participants were highly concerned about the increase in immediate-term need, there was also general agreement among all in this group that Covid-19 had pushed many people into financial crisis, and that this would not end when the Covid-19 crisis, and the additional support associated with it, ends. Two VCS professionals highlighted the vulnerability of people who had been on the brink of hardship for a long time, but were currently just about able to manage as a result of support schemes such as the Covid Winter Grant Scheme and Furlough. They cautioned of a cliff-edge when those schemes end, which is currently due to be March and April 2021, respectively.



Now that we're out of the initial 'crisis' period, what we're seeing now is underlying levels of need, people are struggling to lift themselves out of that additional support. My worry is what happens over the next few months when all the extra funding is pulled out, and there is a declaration that Covid is not a thing anymore . . . I think there's a cliff edge coming.

**Professional, FareShare**

28 Joseph Rowntree Foundation (April 2020) Covid-19 is a greater health risk to people on low incomes: we can give a life-line [www.jrf.org.uk/blog/covid-19-greater-health-risk-people-low-incomes-we-can-give-life-line](http://www.jrf.org.uk/blog/covid-19-greater-health-risk-people-low-incomes-we-can-give-life-line)

29 Maja Gustafsson & Charlie McCurdy (May 2020) Risky business Economic impacts of the coronavirus crisis on different groups of workers [www.resolutionfoundation.org/publications/risky-business](http://www.resolutionfoundation.org/publications/risky-business)

## Aspects of financial hardship

### Unemployment

For participants who were long-term unemployed, as well as those who had recently become unemployed, job searching had been extremely difficult. Participants reflected that the pandemic has led to fewer jobs and higher levels of competition for those that are available.

One participant felt their life had been put on hold due to a number of job interviews being cancelled or delayed as a result of local restrictions. Having been unemployed for nine months, the impact of not having a job for so long was making them feel anxious. Another participant who had also been looking for a job since the start of the year said she was now applying for roles she was overqualified for to increase her chances of finding a job. She had not yet secured work, and felt conscious of a looming deadline next year when her child benefits would stop.



It feels like life is on hold.

**Female, 25-34, London**



There's so many people out of work . . . there doesn't seem to be any jobs.

**Male, 35-44, Cardiff**

### Reduced income

A few participants who were in work but on a reduced salary and not in receipt of benefits had looked online to see whether they might be eligible to start claiming benefits, after falling into financial difficulty. One participant, who lives alone, was struggling to pay the bills while on 80 per cent of his salary, due to being on furlough.

For another participant, the loss of his partner's job meant they had used up all of their savings in an effort to keep up with bills and their mortgage. The impact of this was causing a substantial strain on his mental health due to the feeling his finances were beyond his control, as well as impacting his relationship with his husband. Both the above participants were told that their current earnings meant they were not eligible to receive benefits.



It [the loss of his partner's job] has put us under a lot of stress . . . that has had a really really heavy impact on our relationship . . . I am getting increasingly anxious, particularly about finances.

**Male, 35-44, Glasgow**

One participant had applied for Universal Credit earlier in the year after being furloughed when she saw her income more than halve. Her income reduced from £270 a week to £110. She was struggling to keep up with her bills and paying for her car and phone bills had become particularly difficult. However, despite her income reducing, she received only £6 in total in Universal Credit for the period April to September and was told that her wage was above the eligibility threshold. This meant she had to rely on her partner's parents for financial support, which she found difficult. Not being able to afford to go out and meet friends also made her feel more isolated.

### Difficulty covering costs while supported by the benefits system

Many of those receiving welfare benefits such as Universal Credit continued to struggle with their finances under local restrictions and found it more difficult to stretch their weekly budget to cover the cost of bills and other essentials, including food and fuel. A couple of participants mentioned that the £20 weekly increase had helped. However, as they were spending much more on heating, electricity and food than they were having to before the pandemic as a result of spending so much more time at home, they were still struggling.



With restrictions, the normal [spending] I was living on doubled . . . when you cannot meet it you adjust here and there, and that's when you think Oh God, this [Covid-19] is not treating me well. I can't point my finger on how it stretched, and how come now my £50 budget a week is not enough.

**Female, 35-44, Swansea**

Three participants who mentioned being on Universal Credit said they had struggled to make ends meet during the time they had been under local restrictions. One had to access an emergency food parcel, and two had struggled to afford their rising fuel costs, which had increased due to them and their children being at home much more often.

Research has suggested that the average winter energy bill could rise by up to £107 if people are at home in the daytime<sup>30</sup> and for those who are struggling with debt and cannot afford to heat their homes, there could be greater health consequences.<sup>31</sup> It is likely this will push many more people across the UK into making difficult decisions about which basic essentials they can pay for, as one of our participants in Glasgow had found.



I had an unexpected bill . . . I'd forgotten to get gas, and I only had £20 left, and it was a choice of getting gas so I could have heating and hot water, or getting food so . . . to me that's a no-brainer, especially at this time of year.

**Male, 35-44, Glasgow**

### Changes to Universal Credit during Covid-19

In response to the Covid-19 crisis, the government introduced a temporary £20 per week uplift to the standard Universal Credit and Working Tax Credit rate, for one year.

This is due to expire in April 2021, and does not apply to legacy benefits including Employment and Support Allowance, Jobseeker's Allowance and Income Support.

### People in receipt of asylum support

People seeking asylum do not have access to public funds, such as mainstream welfare benefits like Universal Credit and housing support from their Local Authority, and are generally not allowed to work. People facing destitution can apply for accommodation and support from the Home Office. This is called 'asylum support' and is generally provided in the form of shared accommodation, often including shared bedrooms, and weekly financial support that is currently £39.63 per person.<sup>32</sup> Financial support is paid onto an 'ASPEN card' that people can use to buy basic items in shops, but cannot be used online.

Of the handful of people we spoke to that were seeking asylum, two mentioned having struggled to make their weekly budget stretch to cover food. One participant said his family were struggling to buy halal food from their usual local shop and as a result had been spending much more money trying to get the items they needed from other more expensive shops nearby as they could not shop online. This meant that their financial support of £5.66 each per day became even more difficult to live on.<sup>33</sup> Throughout the Covid-19 crisis, the issue of financial insecurity among people in receipt of asylum support has been a key issue raised by members of the VOICES Network, a nationwide association of people with refugee backgrounds that raise awareness about the challenges they face.

In the recommendations workshop we held with the network, ambassadors described how people seeking asylum are forced to choose whether to spend the small amount of money they have on buying food, or topping up their phone so they can speak to loved ones, seek support and stay up to date with the rules.

Internet access is not provided in asylum support accommodation, and people described struggling to pay for internet access on financial support of £5.66 a day.

30 Energy Helpline, Winter energy bills could increase by £107 for homeworkers (September 2020) [energyhelpline.com/news/winter-energy-bills-could-increase-by-gbp107-for-homeworkers](https://energyhelpline.com/news/winter-energy-bills-could-increase-by-gbp107-for-homeworkers)

31 NEA and Energy Action Scotland, UK Fuel Poverty Monitor 2019-2020 (March 2020) [nea.org.uk/wp-content/uploads/2020/07/UK-FPM-2019.pdf](https://nea.org.uk/wp-content/uploads/2020/07/UK-FPM-2019.pdf)

32 HM Government, Asylum Support (accessed December 2020) <https://www.gov.uk/asylum-support/what-youll-get>

33 British Red Cross, This is not only a humanitarian challenge, but also a public health one (July 2020) <https://www.redcross.org.uk/stories/migration-and-displacement/refugees-and-asylum-seekers/coronavirus-how-can-refugees-afford-food-and-to-self-isolate>



Not being able to go out, not being able to communicate with family . . . having to choose between eating and communicating. That's not fair. That's not right.

**Ambassador for the VOICES Network**

### Changes to Asylum Support during Covid-19

In response to the Covid-19 crisis, the government introduced an increase to asylum support payments of £1.75 per week in June 2020, and then following a further review, introduced an additional 3p per week increase in October 2020, bringing the total weekly asylum support payments to £39.63 per person.

By contrast, in March 2020 the government introduced a £20 per week uplift to the standard Universal Credit and Working Tax Credit rate for one year.

### Food insecurity

The increase in need for food banks has been widely reported by a number of organisations, with record numbers of people in need of emergency food parcels compared to this time last year.<sup>34</sup> Households that are on Universal Credit are 2.5 times more likely to be food insecure compared to those who are not, and those waiting for the result of a Universal Credit application, or who have had an application rejected, are three times more likely to be food insecure.<sup>35</sup> Our report, *Access to food in emergencies: learning from Covid-19*, which explores the issue of food insecurity in more depth, showed that Covid-19 also contributes to a number of factors that can make people more

vulnerable to food insecurity, including financial insecurity, pre-existing health conditions, a lack of support networks, prior experience of trauma, and disability or age.<sup>36</sup>

Around a fifth of the people we interviewed for this research were either in receipt of benefits or had recently had a benefits claim rejected, and had struggled to put food on the table during local restrictions. One participant had to choose between spending the little that remained of her £50 a week budget on either a winter coat for her son or food. While she chose food, she was still having to make decisions to cut out things like meat in order to keep within budget.

Another participant, who lived with her partner and three children, found herself without food while self-isolating due to Covid-19 exposure in September 2020. The family had no food in the house and had little money left to last them the two weeks they would be required to self-isolate for. She was told about the government's offer of financial support for people being advised to self-isolate, but when she rang her council to see if she would qualify for it they told her it was not yet available in her area. She felt she had no choice but to reach out for support from a charity, something she had wanted to avoid doing, and the stress of her situation brought on a bout of depression that meant she struggled to get out of bed for days.



Things just got on top of me . . . I couldn't get out of bed for days. My husband and kids would try and ease me out of it by putting on movie nights.

**Female, 35-44, Liverpool**

As a last resort she decided to call a food bank, but they told her she couldn't access it without a referral. She panicked as she had never had to use a food bank before and wasn't sure where to turn to next. She ended up receiving

34 Independent Food Aid Network, Independent food banks and increased need for emergency food parcels since the outbreak of COVID-19 (December 2020) [foodaidnetwork.org.uk/ifan-data-since-covid-19](https://www.foodaidnetwork.org.uk/ifan-data-since-covid-19)

35 Whitworth, Blake and Moretti, Food security in the UK: analysis and future possibilities (December 2020) [https://www.researchgate.net/publication/347451968\\_Food\\_security\\_in\\_the\\_UK\\_analysis\\_and\\_future\\_possibilities](https://www.researchgate.net/publication/347451968_Food_security_in_the_UK_analysis_and_future_possibilities)

36 British Red Cross, Access to food in emergencies: learning from Covid-19 (July 2020) [redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/access-to-food-in-emergencies](https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/access-to-food-in-emergencies)

an emergency food parcel from the British Red Cross after calling a number given to her by NHS Test and Trace volunteers.



I wouldn't ask anyone for anything but I was desperate . . . I've never had anything off a food bank before. I didn't know how to go about it.

**Female, 35-44, Liverpool**

### Accessing financial support

Despite having faced significant financial difficulties while under local restrictions, only a few people we interviewed had been able to access further financial support. This was also reflected in our UK polling, where one in 20 UK adults said that financial help for essentials such as food, clothes and toiletries would have been helpful under local restrictions, but they were not able to access this support (5 per cent).



I'm in that lower bracket of having money. I'm on benefits, and I have a child and his dad is not supporting. I'm always not where I want to be . . . If I knew where to go to find help I would have gone yesterday.

**Female, 35-44 Swansea**

### Financial support schemes for those told to self-isolate

As of 28 September 2020, those in England and Scotland who are told to isolate by the NHS Test and Trace service who are on a low income, are unable to work from home and will lose income as a result, may be entitled to £500 through their local authority.<sup>37</sup> The scheme was also extended to Wales as of 23 October. A similar scheme has been put in place in Northern Ireland.<sup>38</sup>

None of those who participated in the research said they had benefited from the schemes to provide financial support to self-isolate. One participant had been hopeful when she heard that she may be entitled to a £500 payment to help her and her family while they were having to self-isolate due to Covid-19 exposure. While she had been told about the support by an NHS Test and Trace team, when she rang the council to find out more she was told they weren't yet rolling out this scheme in her area. **In our polling, 43 per cent of UK adults who said that financial support to self-isolate would have been helpful to them said they had not been able to access this support.**

There have been growing concerns about the inconsistencies in self-isolation schemes across the UK. The government supplied local authorities in England with funding to make payments to those required to self-isolate. However, it was reported that this funding ran out in many areas early on, and additional funding has been provided to extend the scheme to March 2021. In February, the Scottish Government extended the Self-Isolation Support Grant to workers earning the Real Living Wage or less after low rates of applications were approved in its first few months. In Northern Ireland the Discretionary Support Scheme, which includes the Self-Isolation Grant, has reported a £2 million underspend. Across the four nations, test and trace apps offer differing

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<sup>37</sup> Department of Health & Social Care, Claiming financial support under the Test and Trace Support Payment scheme (December 2020) [www.gov.uk/government/publications/test-and-trace-support-payment-scheme-claiming-financial-support/claiming-financial-support-under-the-test-and-trace-support-payment-scheme](https://www.gov.uk/government/publications/test-and-trace-support-payment-scheme-claiming-financial-support/claiming-financial-support-under-the-test-and-trace-support-payment-scheme)

<sup>38</sup> NI Direct, Extra financial support (December 2020) <https://www.nidirect.gov.uk/articles/extra-financial-support#toc-0>



levels of access to financial support for those self-isolating, with a recent change to the app in England allowing users to verify their status in order to then apply. In Wales, low-earners notified to self-isolate by the NHS app were initially unable to make a claim to the scheme, but are now able to apply for the grant through their local authority.<sup>39,40,41,42,43,44,45,46</sup>

### UK Polling Data: Needing and knowing how to access support during Covid-19 local restrictions

**39%** of people who said that financial support for essentials such as **food, clothes and toiletries** would be helpful for them **were not able** to access this support (this represents 5% of the total UK population).

**43%** of people who said that financial support to **self-isolate** would have been helpful to them **were not able** to access this support (this represents 4% of the total UK population).



#### Levels of financial need appear to be higher among younger age groups:

Percentage of each age group who said that financial support for essentials such as food, clothes and toiletries would have been helpful to them during Covid-19 local restrictions:

18-24 year olds:	25-34 year olds:	35-44 year olds:	45-54 year olds:	55-64 year olds:	65+ year olds:
21%	20%	18%	12%	8%	4%

Percentage of each age group who said that financial support for longer-term needs (unemployment, mortgage or rent payments) would have been helpful to them during Covid-19 local restrictions:

18-24 year olds:	25-34 year olds:	35-44 year olds:	45-54 year olds:	55-64 year olds:	65+ year olds:
17%	21%	14%	11%	5%	2%

39 Jessica Hill, (December 2020), Fears for Covid spread as councils exhaust self isolation cash, Local Government Chronicle; [lgplus.com/politics/coronavirus/exclusive-fears-for-efforts-to-stem-covid-spread-as-councils-exhaust-self-isolation-funding-02-12-2020/](https://www.lgplus.com/politics/coronavirus/exclusive-fears-for-efforts-to-stem-covid-spread-as-councils-exhaust-self-isolation-funding-02-12-2020/)

40 Jessica Hill, (January 2021), Extra cash made available for self isolation support, Local Government Chronicle; <https://www.lgplus.com/politics/coronavirus/self-isolation-support-grants-to-be-extended-13-01-2021/>

41 All of the respective schemes in Wales (Discretionary Assistance Fund), Scotland (Scottish Welfare Fund) and NI (Discretionary Support Scheme) were allocated with additional funding for crisis support early in the pandemic. In NI the Discretionary Support Scheme has provided almost £11.7 million, and it is estimated it will reach over £17 million by the end of the financial year (March 2021). Bimpe Archer, Irish News, Row after £2 million Covid-19 Discretionary Support Scheme underspend revealed, <https://www.irishnews.com/news/northernirelandnews/2021/01/04/news/row-after-2-million-covid-19-discretionary-support-scheme-underspend-revealed-2176386/>

42 Scottish Government, Scottish Welfare Fund, Self-Isolation Support Grant and Discretionary Housing Payments: monthly data, <https://www.gov.scot/publications/swf-monthly-management-information/>

43 Scottish Government, More people supported to self isolate, <https://www.gov.scot/news/more-people-supported-to-self-isolate/>

44 BBC News, Coronavirus: NHS Covid-19 app starts offering self-isolate payments, <https://www.bbc.co.uk/news/technology-55259272>

45 BBC News, Covid: NHS Wales app users can apply for £500 self-isolation payment (February 2021) <https://www.bbc.co.uk/news/uk-wales-55891893>.

46 BBC News, Paul Martin, Covid in Wales: No grant despite NHS app isolation request (February 2021) <https://www.bbc.co.uk/news/uk-wales-55707833>.

One participant felt she had been passed from organisation to organisation when she had tried to reach out for financial support. The impact of furlough on her finances had meant she was struggling to pay her bills. However, as her pay was above the eligibility threshold for many forms of support, organisations had been unsure what they could do to help.

These instances of miscommunication had made people somewhat sceptical of any information they received on financial support, and the

likelihood that seeking help via any of these routes would be successful. Instead, many had turned to friends and family for support with bills, or money for food, where this was an option.



I remember them [financial support organisations] saying to me ‘you’re stuck between a rock and a hard place’ . . . I wasn’t eligible for any support.

**Female, 16-25, Manchester**

## Chapter Summary & Recommendations

Covid-19 has had a devastating impact on the UK economy, with rates of unemployment and the number of people pushed into financial hardship increasing significantly since March 2020.

Those participating in this research had experienced a range of challenges under local restrictions, including recent and long-term unemployment; reduced income; difficulties making low income, benefits or asylum seeker support payments stretch to cover increased living costs; and food insecurity. This was having a significant negative impact on their mental health. Some of those we spoke to had to make extremely difficult decisions between paying an energy bill, getting food for the week, or buying clothes for their child.

The uplift to Universal Credit and Working Tax Credit is welcome and should be extended to ensure families can make ends meet and afford essentials while the economic effects of the pandemic are still being felt.<sup>47</sup> Similarly, income support schemes, such as the Self-Employment Income Support Scheme and the Coronavirus Job Retention Scheme (CJRS), should remain in place in order to support Covid-19 recovery. We welcome the recent extension of the CJRS until 31 March 2021.

This research also highlights the need for emergency financial support in providing a safety net for people in severe financial crisis. One-off emergency cash grants can help tide over families waiting for benefits or income, and ensure people can continue to afford everyday essentials even when confronted with an unexpected bill.

### We recommend:

- **Governments across the UK should ensure emergency financial support is available and promoted through local welfare assistance schemes, with appropriate investment across the four nations. These should be made available to people who have No Recourse to Public Funds.**
- **In England, the Department for Work and Pensions should invest at least £250 million per year in local welfare assistance over the longer-term, to give local authorities the confidence and certainty they need to develop an effective local welfare**

(continued on next page)

47 This uplift is currently due to end in April 2021.

**offer. National standards and guidance on how schemes are run and promoted are needed.**<sup>48</sup>

- **Governments should review and rapidly improve self-isolation payment schemes so that the criteria are simplified and relaxed to ensure that anyone on a low income, or anyone who would experience financial hardship as a result of self-isolating, can easily access them.**

The extension of the Self-Isolation Support Grant in Scotland is an example of how the criteria for these schemes can be relaxed.

The issues this report has identified around self-isolation payments include schemes or funding not always being available locally, eligibility criteria being too strict, a lack of awareness about discretionary support and stigma associated with accessing help.

- **Governments should provide support to those who are struggling to pay their utility bills during Covid-19 and consider extending the Winter Fuel Payment to all vulnerable groups, such as those entitled to certain benefits.**

### **Financial support for people seeking asylum**

The people seeking asylum that took part in this research spoke of the difficulties making their asylum support payments of £39.63 per week stretch to cover their living costs, particularly when they were forced to shop in local, more expensive shops as a result of local restrictions.

Asylum support payments were increased by £1.75 per week in June 2020, and by a further 3p in October 2020 (totalling £1.78), a significantly lower increase than the £20 uplift to Universal Credit.

Asylum seekers' ability to spend this money is also restricted as a result of the fact that the ASPEN card, which is how asylum support payments are made, cannot be used online, and in some cases cannot be used to take out cash, either.

- **The Home Office should increase Asylum Support rates in line with the £20 per week increase to Universal Credit and enable ASPEN cards to be used online.**

48 There are significant differences in how local authorities run their local welfare schemes in England, and research by The Children's Society found that 1 in 7 areas had no scheme in place at all. Many are also poorly publicised and may involve highly opaque and onerous processes for applicants. Government guidance should ensure funding is effectively spent and there is greater consistency in provision across areas. See further recommendations on Local Welfare Assistance best practice: <https://www.childrenssociety.org.uk/sites/default/files/2020-12/Utilising-the-COVID-Winter-Grant-Scheme-to-strengthen-Local-Welfare-Assistance.pdf>.



## 8. Barriers to accessing support under local restrictions

### Accessing support under local restrictions

#### Awareness about where to access support is low

The Covid-19 crisis has resulted in an overall increase in the need for support for many of those interviewed in this research. The organisations we spoke to had also noticed a large increase in support needs, particularly from those who had not sought support before.

While many we spoke to had seen a lot of information about Covid-19 and corresponding rules from various media sources, organisations, or family and friends, they felt they had not heard about the types of support available.



There is a lot more increased knowledge about what to do [to protect yourself] but in terms of actual support there is very little.

**Male, 35-44, Birmingham**

Very few people were aware of the support available in their local area, particularly when it came to offers of emotional support.



I get emails from the bank about support but I don't want to speak to the bank about my mental health . . . I haven't gotten anything from the council.

**Female, 25-34, London**

On reflection, many participants felt they could have benefited from either practical or emotional support during local restrictions, however for those who had not been receiving support before the pandemic began, there was a lack of awareness about where they could go for support, or what was available in their area.

A similar pattern was seen in the polling, where a significant minority of one in five adults (19 per cent) said that emotional support would have been helpful to them during local restrictions, and a similar proportion said that signposting to relevant advice, services and other support they might need (23 per cent) would have been helpful (in both cases this was whether they had gone on to access this support or not). Awareness was also found to be low in the polling, where 40 per cent said they would not be confident in knowing where to go for financial support if they needed it, and 36 per cent said the same about mental health or emotional support (see polling data on page 32).

Of the people we spoke to who were not in contact with VCS organisations, very few said they had seen information such as posters or pamphlets detailing where they could go for support if they needed it during local restrictions, no matter the level of restrictions in their area.

#### Participants already in receipt of support pre-Covid found it easier to access support

While this research has shown that there are some challenges for people in accessing support for the first time under lockdown rules, those who were receiving support from VCS organisations or healthcare professionals before the Covid-19 crisis have largely continued to receive this support throughout national lockdown and local restrictions, broadly speaking without problems.

One participant who was receiving support for addiction was continuing to speak to his support worker regularly on the phone, and occasionally meeting them in the park, and another had connected with his local Mind group a few times over Zoom, including attending yoga and mindfulness sessions, which he was finding useful. Another participant continued to attend a ladies group, organised by a VCS organisation she had been connected with before the pandemic, which was now taking place via weekly online video conferencing.

Those who already had some level of contact with support organisations before the pandemic, such as VCS organisations or their local authority, tended to be better able to access further support during local restrictions, compared to those who had no existing links with these types of organisations. For example, when one participant struggled to afford food at different times during national lockdown and local restrictions, it was his social worker and support worker that put him in touch with the charities, the British Red Cross and Well Fed, that provided him with emergency food. In the national lockdown, this was due to a delay in his benefits coming through, and under local restrictions this was the result of an unexpected gas bill. The participant highlighted the value of accessing this support at such a difficult time.



Well Fed — I had to find out about that through my social worker when I had that . . . They were a lifesaver, if it wasn't for them I'd have probably been about five stone lighter within a month, because I'd have had nothing.

**Male, 35-44, Glasgow**

However, few of these participants had seen information on additional avenues of support during local restrictions, and therefore relied on existing networks when they reached crisis.

### Digital isolation

One professional cautioned that the reliance on online support and information only works for those with an internet connection, leaving a significant minority who do not have internet unable to access vital information and support. One participant we spoke to, who was living in Home Office accommodation and currently seeking asylum, had no TV or internet connection in her accommodation. As she was in contact with the British Red Cross during this time she had been able to speak to her case worker each week, who had helped to keep her informed about the rules, and enabled her to access further offline support if she needed it. For those who don't have pre-existing access to this type of support, the challenges they face are much more likely to go unresolved.

### Participants are reluctant to reach out for support for the first time

Those who have not received additional support before, either from community organisations or statutory bodies, may need additional encouragement if they are to reach out for help. One professional who participated in the research said that many of the people they spoke to during local restrictions were not used to asking for help and as a result were reluctant to seek out and accept help that might be available to them.

This was particularly true of those struggling with their mental health, but also applied to those who needed financial support. In such cases, not knowing how to apply or where to find out more was also a significant barrier to them accessing support, as seen above. There were also a number of other reasons mentioned as to why this was the case:

- Feeling they should be able to cope without support
- Stigma around reaching out for help
- Reluctance to use certain support channels
- Fear of not being eligible

### Many feel they should be able to cope without support

Many of those we spoke to felt that they should be able to cope with their problems on their own. People often mentioned that they were luckier than others who had it much worse, and therefore felt they weren't entitled to reach out for support. This had prevented many from speaking to friends and family about their emotional and practical struggles.



Because you don't feel unique in your experience it doesn't feel like you should reach out for support.

**Female, 16-24, London**

## UK Polling Data: Accessing support during Covid-19 local restrictions

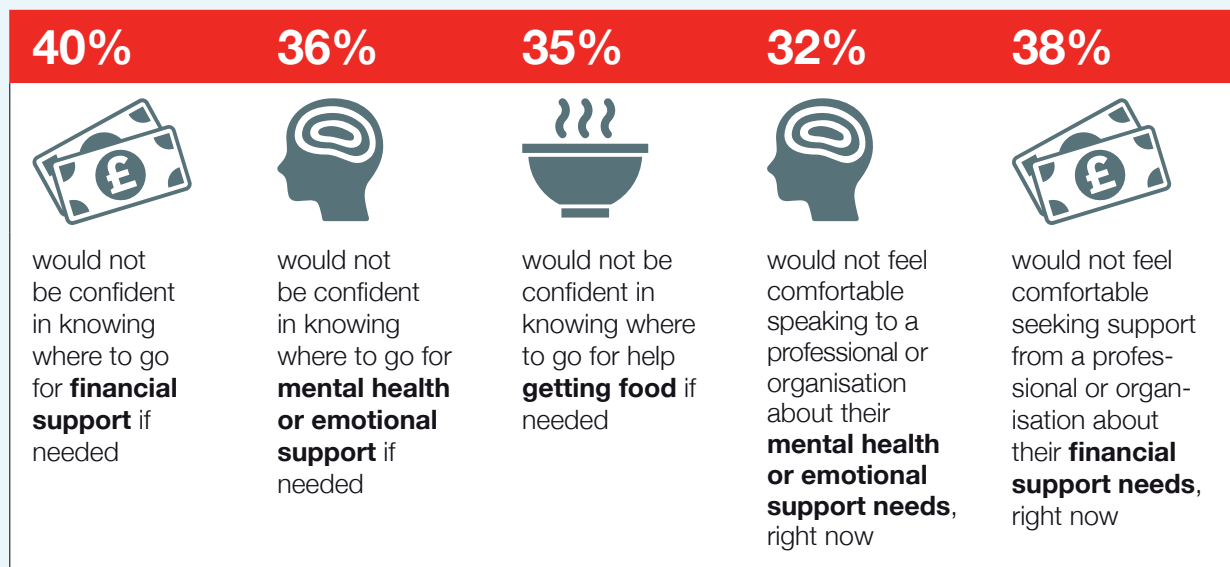
Types of support, information or resources that people said would have been helpful to them during Covid-19 local restrictions:



Out of those who said that signposting to relevant advice, services and other support would be helpful for them under Covid local restrictions:



Under local restrictions:



Source: UK-wide nationally representative polling (8 to 11 December 2020).

49 Please note that this research was conducted before the introduction of Tier 4 in England.



## Over half of UK adults (55%) agree that it is hard to talk about their problems when so many people are having a difficult time due to Covid-19

Source: UK-wide nationally representative polling (8 to 11 December 2020).

### There is stigma around reaching out for help

For some, the stigma around receiving help, particularly for their mental health, has prevented them seeking support. One participant mentioned that he felt he should be able to manage his mental health on his own, saying this was due to “male pride”. A few participants mentioned that talking about their mental health was not something they did openly with family or friends. For some this was because they didn’t want to “burden” family and friends, who they felt were also going through a difficult time. One participant mentioned that in her family’s cultural background, discussing issues around mental health was not something they did.

### Many are reluctant to use certain support channels



Some mentioned feeling hesitant about reaching out via certain support channels, either because of a previous negative experience or because they felt uncomfortable speaking to someone over the phone.

One participant put down the phone after getting through to speak to an adviser on a support line as she felt too anxious to explain her situation. She had decided not to reach out for support after this and had been trying to manage symptoms on her own. However, others felt that it might be easier for them to speak to someone they didn’t know over the phone, but weren’t sure where they should go to get that support.



Similarly, some participants were reluctant to reach out to their GP. Two different participants said that in the past their GP had not provided them with the support they needed, offering them

medication but no other support for their mental health, and therefore both had decided not to reach out again. In both instances, this was because the support they had been offered was in the form of medication, and both participants were hesitant to take this approach when it came to their mental health and emotional wellbeing. Another participant said he would never go to the GP about his mental health but might attend a group if it was not framed specifically as “a mental health thing”.

How comfortable people are with speaking to their GP about their mental health appears to be driven by previous experiences with, and overall perceptions of, their GP practice. One participant who had had more contact with her GP generally said she felt more comfortable speaking to her GP over other professionals about issues regarding her mental health, because of the familiarity she has with their service.



I’ve had to say before, I want to speak to someone from my GP surgery, especially when you’re talking about mental health issues, I don’t want to go through the 20 year history of my depression, so that’s been an absolute nightmare . . . It’s not always easy to open up to a stranger, even though you know they are trying to help.

**Female, 35-44, Liverpool**



### Fears of being ineligible

A few people mentioned that they felt they wouldn't qualify for support. This was either because they felt they didn't "have it as bad as other people" or they felt that formal support systems would be too complicated. When prompted about whether they had been able to access local welfare schemes, one participant mentioned that he probably wouldn't reach out for local authority support, as he feared he would have to jump through lots of hoops to receive any additional support.

### Lack of available support

#### Participants feel support during local restrictions was less available than during the first national lockdown

A number of people we spoke to mentioned feeling that support, both formal and informal, had dropped off since the first national lockdown. Under local restrictions there was no specific support from central government for those who were previously advised to shield, like the food parcels that were available under the first national lockdown. This is despite the fact that many of the people we spoke to who were vulnerable, particularly those who were clinically extremely vulnerable, had continued to remain at home as much as possible and in effect had continued to shield.

One participant felt that the criteria for accessing support now seemed stricter than before, saying it was "a lot easier" to get one-off support such as emergency food during national lockdown. He had been able to access a food parcel from a charity during the first national lockdown but when he needed it under local restrictions, after he had been sent an unexpected bill and had no money left for food, he found he did not meet the criteria. He had to ask for help from his support worker who was able to find a charity that could help.

#### Participants feel "alone" in managing their situation

Due to a lack of information about what support is available, and with many being reluctant to seek out support, a number of participants mentioned feeling left alone to manage their own situation.



I think that people that are placed on the shielding list . . . should be contacted more to make sure that they are alright. Once you're put on the list they say 'that's it', there's no check up after that to make sure that you're actually able to handle the restrictions. A telephone call to say are you okay, do you need any support, are you managing, instead of being told to shut yourself away, that would be a huge benefit. Just to know that someone out there is thinking of you. I think that would help a lot with people's mental health.

**Female, 65+, Stockport**



We've just been cast adrift essentially . . . we get no government help . . . we won't qualify for any help . . .

**Male, 35-44, Glasgow**

Quite a few people mentioned that it would be nice for someone outside their family and friendship group to reach out to them to check whether they are okay. Those that were particularly vulnerable to Covid-19 or who had been told to self-isolate would have liked someone from or affiliated with the council to check that they had everything they needed, or direct them to places they could go for support. One participant mentioned that it would have been helpful if someone from the NHS Track and Trace service, who informed her she must self-isolate, had checked to see whether she would be okay and that she had enough food in the house.



One thing that would really help – the moral support, being able to get someone to talk to, that shows me that I'm not in this alone, I have someone who cares, to share my problems, someone who can be a shoulder I can lean on. Not having anyone to talk to is really difficult.

**Female, 35-44, Swansea**

One student felt that there hadn't been enough support for people at university, particularly those living in halls of residence. She had stopped attending some university lectures as she was struggling with her mental health and she felt no one would notice whether she attended or not. She had to go in and out of self-isolation when people on her floor had been in contact with someone with Covid-19, and while she received an email telling her to stay in her room, she did not receive any support for having to do so. There was no one checking in to make sure her and other students were doing okay.



It doesn't feel like anyone is checking up on you or looking out for you . . . it definitely feels like you're the most neglected group [university students] in terms of local restriction conversations . . . I have this tiny room and I have to eat here, sleep here, study here . . . it's just you by yourself and it feels like you're forgotten.

**Female, 16-24, London**

This drop in formal support was also accompanied by what people felt was a decrease in a sense of community as they transitioned from national to local restrictions. Many mentioned that the goodwill and community spirit that was present during the beginning of the national lockdown had diminished over the course of the year, with community initiatives having "dropped off". One participant mentioned having joined a worldwide Facebook group earlier in the year where people had posted activities that people could join. However, she found that these events slowly stopped happening and she had seen no other local groups advertising community activities she could take part in.



There started off being a lot of community initiatives for people who were shielding or needed childcare but that good will has well gone.

**Male, 35-44, Glasgow**

Some participants felt that other people were also respecting the rules less, and gave anecdotes such as seeing people not wearing masks in shops and seeing groups of people gathering. These sorts of anecdotes, accompanied by many participants mentioning having seen news articles about people breaking local restrictions, had left some participants feeling disheartened at people in their local community and added to a sense that within local restrictions, people were in it for themselves.



In the first lockdown we were all going through it together.

**Male, 35-44, Birmingham**



I feel frustrated when I see people not following the rules.

**Male, 25-34, Leicester**

## **Voluntary and Community Sector (VCS) capacity to deliver support**

The professionals we spoke with broadly felt that the restrictions were not preventing them from being able to support people properly. In general, professional participants felt their organisations had adapted well to providing support for people under local restrictions. However, participants from the VCS highlighted that for this to be possible their staff had worked under extremely stressful conditions to continue supporting their community, and that many were now burnt out as a result. Two of the professional participants that work in the VCS also said that the Covid-19 crisis on the whole had forced them to make progress, in terms of collaborating with others in the sector and making the most of virtual technologies, which could otherwise have taken many years to develop.

One professional said that providing support for people during local restrictions had been more difficult when compared to national lockdowns. During national lockdowns, as people were all in the same situation, providing support across regions had been much easier. However, with frequently

changing restrictions, it had been hard to continue to provide a continuous and effective service across different areas while continuing to support their service users as fully as they previously had.

As seen in Chapter 8, professionals who worked in the VCS were concerned that the impact of the last nine months of restrictions would have a huge impact on longer-term need. They were

worried about the strain this might place on existing staff and volunteers. Significant ongoing support, and not just the sticking plaster of emergency food parcels or loans, will be needed to lift people out of hardship and this will create significant additional demand on the government, local authorities and the VCS for years to come.

## Chapter Summary & Recommendations

Despite an increase in practical, emotional and financial support needs under Covid-19 restrictions, for the most part people don't know where to turn for help. This was particularly true for those who have never accessed support before, and professionals also expressed concern about those who are digitally isolated.

Many participants felt there had been a decline in the availability of both formal and informal support during local restrictions.

The majority of participants in our research expressed reservations about seeking support, whether that be from local government, voluntary and community sector organisations or from family and friends. This was for a variety of reasons, including stigma, not wanting to burden others, fears of ineligibility, and a reluctance to use certain channels or services they had found unsatisfactory before.

### We recommend:

- **Local authorities should identify areas and individuals most at risk to target support. This should be achieved by partnering with the voluntary and community sector and local communities, using tools such as the British Red Cross's Vulnerability Index.<sup>50</sup> When additional restrictions are put in place in local areas, practitioners should attempt active outreach to individuals not currently in receipt of support.<sup>51</sup>**
- **Governments across the UK should ensure that those living under additional restrictions receive a level of support tailored to meet their individual needs, addressing both the access and cost implications for those who are vulnerable. This should specifically support those struggling to afford essentials, such as food, and those who take the decision to shield.**
- **Governments should ensure that all local authorities are fully resourced to continue to support the clinically vulnerable, clinically extremely vulnerable and non-shielded vulnerable, with access to essentials such as food. Emotional support, such as for loneliness, should also be attached to this provision.**
- **Governments should resource the voluntary and community sector to continue to support people with their practical and emotional needs during Covid-19 and in recovery.**

<sup>50</sup> The British Red Cross has developed a Vulnerability Index, which is being piloted by some local authorities to target areas of greatest need: <https://britishredcrosssociety.github.io/covid-19-vulnerability/>. This might include: BAME people, single parents, people in lowest-paid occupations, people in receipt of benefits, people with a long-term health condition/disability, care workers, people with low savings, especially self-employed, families with dependent children, people with no recourse to public funds, asylum seekers, and people affected by domestic violence.

<sup>51</sup> For example, organisations can request support from the Voluntary and Community Sector Emergencies Partnership online: [vcsep.org.uk/request-support](https://vcsep.org.uk/request-support).

## 9. Accessing & understanding information about local restriction rules

### Sources of information about local restrictions

The people we spoke to had heard about local restrictions through a variety of sources, most commonly through news apps, by watching the news on TV, via social media or through word of mouth.

#### Official news channels

Some participants said they had first heard about additional local restrictions being introduced in their area through the news, largely through the government's coronavirus daily briefings, often delivered by the Prime Minister, or through briefings from the First Ministers in Northern Ireland, Scotland and Wales. News sources such as BBC News and STV (Scotland) were popular platforms through which news about the local restrictions was reaching people. A number of participants mentioned feeling this was where they would get the most up to date and trustworthy information.

#### Social media

Participants had mixed opinions on how reliable social media was as a source of information about local restrictions. Some mentioned that they had actively avoided consuming news through social media as they found this information was often outdated or inaccurate. One participant had been left confused when a news article she read on Facebook had given her a slightly different version of the things she could and couldn't do compared to the information she had seen on BBC news, only to realise that the information found through Facebook was four days old.

However, those that follow official organisations on social media, such as their local council, have found these sources of information useful as they are specific to their area and tend to be reliable. This did vary, however, as in some instances local councils

appeared to be updating residents regularly via their social media channels, while other participants said their local council's pages had rarely been updated.

#### Information from statutory bodies and the NHS

Participants had generally found that clear and detailed information about local restrictions and any support that might be available to them had to be sought out rather than sent to them directly. Many mentioned that they had not received any information from their local council about the restrictions in place in their area, unless they actively followed them on social media or online, which was the case for a handful of the people we spoke to.

Two participants mentioned they had received information from their GP regarding local restrictions either via text or in a letter. These communications were often regarding access to appointments and surgery opening times. The participants that mentioned having received such updates had long-term health conditions and regular appointment or prescription needs, and so tended to be in regular contact with their GP practice.

The minority that had seen or received information from either their local authority or GP were happy with the information, saying it was easy to understand and specific to their area. Those who hadn't received information from these sources felt their local authority and GP surgeries could be doing more to ensure people in their area were kept up to date regarding the local restrictions, and how they might affect them.



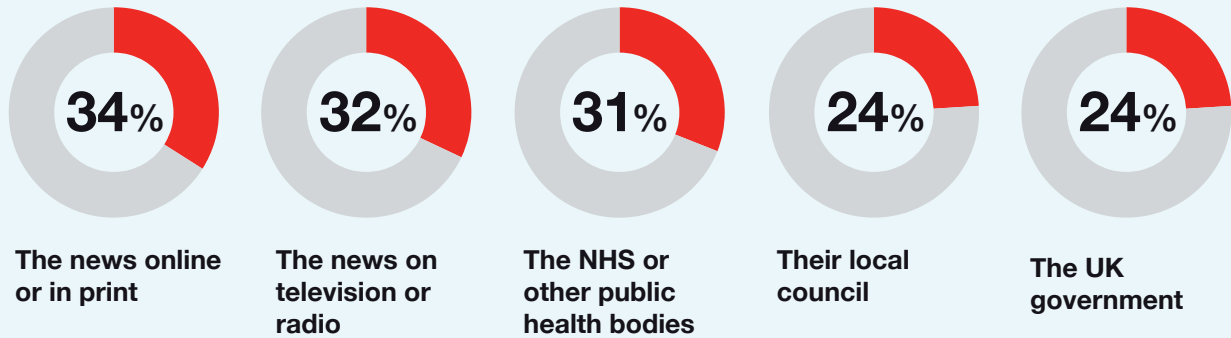
It would be nice to hear from somebody [from a formal channel] or hear something [about the local restrictions in your area].

**Female, 25-34, London**

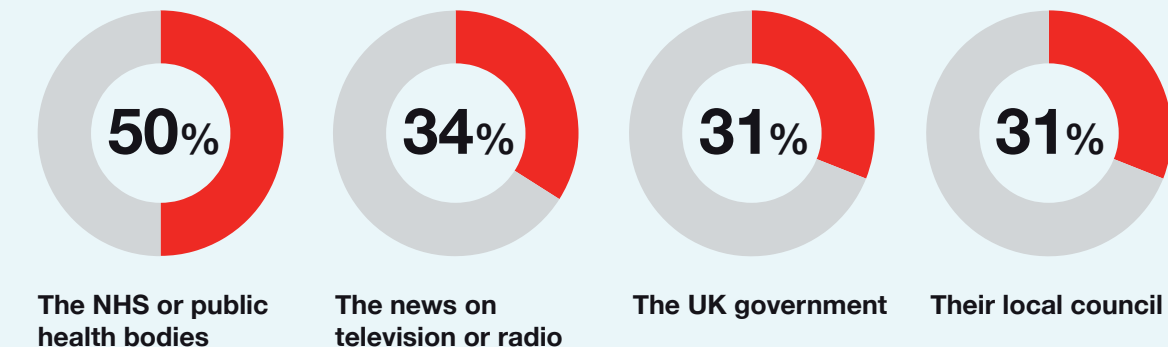
**UK Polling Data: Trusted and helpful sources of information on Covid-19 local restrictions**

**50%** of UK adults say they trust that the local coronavirus restrictions the government has put in place will keep them safe

**Sources UK adults find useful for keeping up to date with developments around local restrictions**



**Sources UK adults trust to provide accurate information about Covid-19 local restrictions in their area**



**Trust in news on television or radio is lower among younger age groups, and increases by age (18-24 year olds: 23%, 65+ year olds: 39%). This trend is reversed for news online and in print.**

Source: UK-wide nationally representative polling (8 to 11 December 2020).

**Proactive information gathering**

It was those who had sought out information themselves that felt more informed about local restrictions. This was often in the form of looking on government websites or checking more localised news sites. One participant found out she would be able to bubble with her mum a few days after the Tier 3 restrictions came into place in her area after looking on the Manchester Evening News website. She hadn't been able to find out this information through

the BBC news when the local restrictions were first announced and was relieved when she found out that she could retain contact with her mum for support as they both live alone. Otherwise she would have continued to self-isolate unnecessarily.

Another participant said he had looked on 15 different websites in order to understand what was going on in his area in regard to the different tiers, and was highly frustrated that it had been such hard work to understand what

the rules meant for him. As he travels for work, knowing which tier was in place in which area was particularly important.



I feel like I shouldn't have to go on Google and spend an hour of my time researching. I just need clear, concise information. And be transparent about what's happening, how long this will last.

**Male, 25-34, Leicester**



It's only if you go looking . . . that you'll actually find out.

**Male, 35-44, Glasgow**

## Confusion about the rules themselves

While in our UK polling the majority of adults say they have found it easy to get clear information about local restrictions (58 per cent), there is a significant minority of over a third who have not (37 per cent). Those who feel unable to cope with the changes to their life caused by the pandemic have also found it more difficult to access clear information about local restrictions (61 per cent say this).

This confusion was also reflected in the interviews we conducted. Whichever source participants used to find out about the local restrictions in place in their area, for many the information they received was confusing. Some mentioned that they often felt no clearer having watched a UK national briefing in which the local restrictions were explained. Participants felt the language used to describe the local restrictions was often too complicated, not put "in plain English" and also lacked relevant detail. Participants mentioned that this confusion around the rules had also been a source of stress for others they knew, such as elderly friends, neighbours and relatives.

## Participants want simpler, clearer information on local restrictions

As a result of finding the available information confusing, a number of participants in the research had decided to stop watching the news and were relying instead on government and local authority updates. Some had stopped watching or reading about local restrictions altogether. This meant a few people were relying on word of mouth to get any updates about the local restrictions which, given the levels of confusion about the rules, is likely to mean more people are not properly informed.

One professional we spoke to, who worked for a local authority, mentioned that they had needed to adapt almost all information put out by central government regarding the restrictions. This was often because language was unclear or would not be understood by the people in their community. They instead created a series of animations explaining the local restrictions and the tiered system. These animations were also translated into a number of languages so that they were accessible to as many people in the community as possible.

Participants said they would most benefit from being able to access a simple bullet-pointed list of what they could and could not do in their area specifically, stripped of any opinion or analysis, as is rarely the case in the news. They found national news updates could be confusing, as there was a lack of differentiation between areas and tiers, which made it more difficult to pick out the information that was relevant to them.

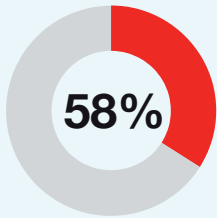
Often, people wanted tailored information to come directly to them from one source that they felt able to trust. A few of those who were struggling emotionally would have liked to have received information on local support they could access alongside this.

## Updates from central and local government

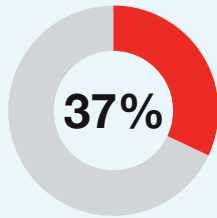
While the type of information participants say would be most useful does to a large extent exist on central and local government websites, over half of the people we spoke to weren't aware of these websites as a place to look for updates, suggesting that this information could be better signposted.

## UK Polling Data: Understanding of information about Covid-19 Local Restrictions

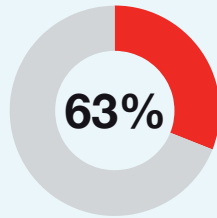
At the general population level, most people seem able to find clear information about Covid-19 local restrictions:



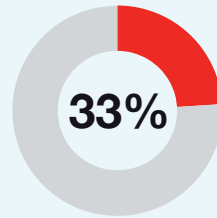
agree that they have found it **easy to get clear information about local restrictions**



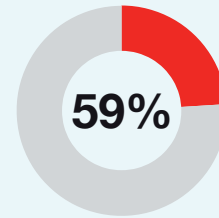
**disagree** that they have found it **easy to get clear information about local restrictions**



are confident that they **fully understand the coronavirus restrictions in their local area**



are **not confident that they fully understand the coronavirus restrictions** in their local area



say the **information about local restrictions has been more confusing** than the information about the UK-wide national lockdowns



- **Younger people are particularly confused by local restrictions.** 72% of 18-24 year olds and 70% of 25-34 year olds say **information about local restrictions has been more confusing** than information about the UK-wide national lockdowns, compared to 49% of those aged 65+.
- Half of UK adults (50%) say they **find it difficult to keep up to date with the latest coronavirus restrictions** in their local area.

One professional we spoke to at Leeds City Council found that being able to send information to people locally by text had been beneficial and allowed them to consistently communicate with people who are clinically extremely vulnerable. This kind of update meets many of the criteria people we interviewed said they wanted from communications about local restrictions, providing area-specific updates on local restrictions directly to those they apply to. This leaves little room for ambiguity in a space where both the system of local restrictions and the rules in place in a given area are changing regularly.



We've communicated by text messaging to everyone we have a number for. People have said that that's been so helpful.

**Professional from Leeds City Council**

Out of our participants, those who had used government and local government websites to access information about local restrictions were the most likely to feel well informed, though some local authorities were found to be better at updating their pages than others. This finding suggests that there could be value in better targeting publicity around these websites, or better targeting this information among certain populations, as a reliable source of information about local restrictions.

### Different rules in different areas

Some participants mentioned being particularly confused about the regional differences in rules, as well as across the different nations. For example, one participant in Scotland mentioned that, as the restrictions were now in place by healthboard rather than local authority area, people were unsure of what their health ward area was, making it more difficult to know which rules applied to them.



I don't think anyone knows what health ward they're in. Maybe they need to put signs up or something letting people know.

**Male, 45-54, Glasgow**



I was getting confused about whether pubs could be open. On one street there are rules preventing them being open and I can turn a corner and they'll be allowed open.

**Male, 25-34, Leicester**

Two participants in Wales had been confused by the rules, particularly as they felt that the UK national briefings presented by the Prime Minister and scientific advisors, had been specific to England and often “blanket statements” had been made that weren't applicable to people in Wales. A participant in Scotland had also said that, while he found the Scottish briefings clearer than the Westminster ones, the fact that there were two figures of authority putting out rules that contradicted each other had been very confusing for his grandmother. He had to simplify the rules for her so she could understand.



When he talks about ‘the country’ he means England . . . we've got different rules here. It gets confusing to know what the rules actually are.

**Male, 45-54, Cardiff**



My problem is, as not a British person, it gets confusing when someone is talking for England, Scotland and Wales – I take myself out of the confusion and focus on my local council.

**Female, 35-44, Swansea**  
[respondent had moved to the UK from South Africa]

There was particular confusion for participants about rules around travelling between tiers. This has also been a challenge for organisations providing support to people in areas that are under different restrictions. One participant said he had struggled to inform those coming to the homeless shelter at which he works that they needed to arrange accommodation in advance when travelling from a Tier 3 area in England to Wales. Some mentioned that they felt the rules for travelling between tiers had not been explained clearly enough.



Confusing, so confusing . . . and my son's in a different tier. And the bubble [is] with my son. I find myself having to research areas that I drive to.

**Male, 25-34, Leicester**

### Language barriers

A number of participants voiced concern that the information about local restrictions appeared to be communicated without enough consideration for those for whom English is not a first language. This had some notable negative impacts for participants in the research including confusion around the rules and a sense of anxiety about breaking the rules in place in their area.

One participant, a refugee from Syria, had not been able to read a letter which they think could have been about local restrictions. Another's parents, who had limited English, had often been left confused about what they could and couldn't do under the restrictions.



I think a letter came to my house to say we must not go out. But I don't speak English very well, or don't read very good. I didn't read it because I thought it looked very hard.

**Male, 16-24, Leicester**

Most refugees and people seeking asylum who participated in the research mentioned that language had been a barrier in some way to them fully understanding the local restrictions



in place in their area. Most had not been aware of information being available in a language they could understand. While these participants generally had a good grasp of English, many still said they had struggled to understand certain aspects of the restrictions, for example the different tiers.



I try as much as I can to understand rules. I just know I have to stay home because . . . I don't know. You never know. Tier this and Tier that, I really don't know, so just no matter what I stay at home. [It's] just a total lockdown on my end.

**Female, 35-44, Glasgow**

For some refugees and people seeking asylum, this lack of understanding had created an anxiety around breaking the rules. One participant decided to continue behaving as if she was in total lockdown, as she was unclear on the tiers and was scared about catching Covid-19. Another participant, a refugee from Syria, had been frightened that he would go to prison after the police passed through the park he was in with his friends while in national lockdown, and told them they weren't allowed to be there. He now looks online to find out information about what he can and can't do.



The government is not trying to confuse us [non-native speakers] when they speak, it's just that we start from a reception level to understand what is being said.

**Female, 35-44, Swansea**



Everyone has a right to know what's going on and how to protect themselves.

**Female, 35-44, Glasgow**

One participant, who was seeking asylum, was kept informed about the national lockdowns by her housing officer through phone calls, and also received a letter from them which explained what the lockdown would mean for her, as she was in Home Office accommodation. However, she had not received information regarding the local restrictions in her area, apart from a couple of text messages from the Home Office regarding access to the local immigration reporting centre.

With many people facing language barriers in understanding and keeping up with messaging from central government on local restrictions, local VCS organisations have tended to fill this gap, creating their own communications to explain the rules to people in ways they can understand. However, we spoke to a professional at Leeds City Council, where the Council was putting out information on local restrictions in various languages to ensure people were getting the information they needed. This was particularly important for those classed as clinically extremely vulnerable, who in some instances had received information solely in English, making this information inaccessible for them. In partnership with Doctors of the World, the British Red Cross has also been translating information into 60 different languages, to ensure that people have access to the information they need regarding local restrictions and support.<sup>52</sup>

### **Lack of information for the clinically vulnerable and clinically extremely vulnerable**

For people who were told they were clinically extremely vulnerable and asked to shield in March, information regarding the local restrictions in their area and guidance on how to protect themselves is particularly important as they are at the highest risk from Covid-19. The list of which conditions are classed as clinically extremely vulnerable, and which are classed as clinically vulnerable and at a moderate risk from Covid-19, vary slightly between different nations within the UK. Advice also differs based on the level of risk in each area or local restriction tier.

<sup>52</sup> Doctors of the World, Latest government guidance translated into 60 languages (December 2020) <https://www.doctorsoftheworld.org.uk/coronavirus-information/>

Those we spoke to who discovered they were clinically vulnerable, and clinically extremely vulnerable, during national lockdown had continued with the same routines during local restrictions because of a fear of contracting Covid-19. However, under local restrictions few from these groups received specific, tailored information from central or local government, or their GP, about the new rules and what support they might be able to access to protect themselves and maintain their health and wellbeing.

### Those at higher risk from Covid-19: definitions

#### Clinically Extremely Vulnerable (CEV)

People at the highest risk from Covid-19 include those with specific health conditions. An example of this includes some cancers, and severe respiratory conditions. Those who are CEV should have received a letter from the NHS or from their GP telling them.<sup>53</sup>

#### Clinically Vulnerable

People at a moderate risk from Covid-19 include those who are 70 or older and have long-term health conditions such as heart disease or diabetes. Unlike those who are CEV, this group did not receive a letter from the NHS and wouldn't have been advised directly that they are at a moderate risk to Covid-19.<sup>54</sup>

While identifying those who are CEV or clinically vulnerable was a major objective during the first national lockdown,<sup>55</sup> under local restrictions there seems to be confusion around how those who are CEV or clinically vulnerable should protect themselves, and whether they should continue to shield or isolate. This is partly due to a lack of tailored information and advice.

One professional we spoke to who supports clinically extremely vulnerable people stressed the importance

of providing clear information when announcing local restrictions. They said there had been little tailored information for people classed as clinically extremely vulnerable during local restrictions. In some instances, it had not been made clear to people why they had been classed as vulnerable.

This had meant that some people who had been classed as clinically extremely vulnerable had interpreted the same information and advice around local restrictions completely differently to each other, reflecting the ambiguity in the rules and the ways in which they were communicated. One professional participant from Leeds City Council said it had often been necessary to follow up with central government to clarify what the rules meant. This confusion is reflected in the example of a government letter which people classed as clinically extremely vulnerable received in April; while one person was relieved to receive the letter and glad their circumstances were being taken seriously, another person felt they were being told they were going to die and it pushed them to make a will.

The changes in advice for people classed as clinically extremely vulnerable during local restrictions has also been difficult for local authorities to keep up with, one professional participant said. They have had to request a weekly update as to whether the advice for people classed as clinically extremely vulnerable has changed. Ensuring people who are clinically extremely vulnerable are kept up to date regarding changes in advice is important and this professional felt that this had often not been the case during national announcements.



There was never a time when a government communication [on guidance for the clinically vulnerable or CEV] was clear enough that we didn't have to follow it up.

**Professional from Leeds City Council**

53 Department of Health & Social Care, Guidance on shielding and protecting people who are clinically extremely vulnerable from COVID-19 (December 2020) <https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19#cev>

54 NHS Latest information and advice about coronavirus (Covid-19) (December 2020) <https://www.nhs.uk/conditions/coronavirus-covid-19/>

55 <https://protect-eu.mimecast.com/s/ZcZ3C14LLHLgBGfm8FNd>

## Timing of information

The professionals we spoke to felt there had been a lack of timely information regarding the introduction of local restrictions in their area. In some instances, they did not have enough warning to ensure they could communicate effectively with those in the community. Most organisations had heard about the restrictions at the same time as the public, when they were aired on TV at central government briefings despite providing vital support to people affected by Covid-19.

There was thus a sense that communication between central government and other statutory bodies and VCS organisations needed to improve. Data on infection levels, as well as decisions made by central government, were often communicated to organisations too late for them to take effective and timely measures. They

said that better, earlier communication in the future would help to improve the overall response to both local outbreaks and any new restrictions that need to be introduced at a local or national level.



There needs to be a general switching around of the attitude. Give autonomy to local leaders, public health experts to make decisions. Better two way flow of information. We know that information was being hoarded by central government, we don't know what numbers are for our local area, so how can we expect people to provide a decent service? That really needs to change. Data should be distributed far more widely.

**Professional, LGIU**

## Chapter Summary & Recommendations

Our qualitative interviews and polling show people have struggled to access and understand information about local restrictions in their area. Many felt confused about what they could and couldn't do, and had found it difficult to keep up with changes to the rules. In some cases, people have disengaged entirely.

People whose first language isn't English were even more likely to struggle to understand information about local restrictions. Many we spoke to that were in this group had not seen information about local restrictions in any language other than English.

Participants expressed a preference for tailored, localised content, stripped of analysis or opinion, and communicated as simply as possible. They thought that a simple list of what is allowed and what is not allowed would be the easiest format to interpret.

In some places, the voluntary and community sector and local government are working together to communicate and interpret the regulations for different communities, including translations for non-English speaking communities. This could be done in a more timely and effective way were they to be given advance warning when an area was going to go into local restrictions.

### We recommend:

- **Governments across the UK should keep tiered or level systems as consistent as possible to avoid confusion and motivate people to follow the rules.**
- **Central and local government should ensure any guidance on the rules and restrictions during coronavirus is provided in multiple languages, as standard. This should be based on an assessment of local language use and be funded appropriately by central government.**

(continued on next page)

- **Local authorities should regularly disseminate information both online and offline that is easy to interpret and tailored to the local community. This should set out clear advice for clinically vulnerable and clinically extremely vulnerable people about what they can do, while staying safe. To complement this, local authorities should work with voluntary and community sector organisations, including grassroots organisations and community members, to proactively target information and advice to people who are digitally isolated, clinically vulnerable and clinically extremely vulnerable, and who speak English as a second language.**
- **Governments should establish effective early warning systems for local emergency response partners, including local authorities, health bodies and the voluntary and community sector, in areas that are about to enter into new or additional local restrictions, in order to enable an effective human-centred response.**
- **Governments should ensure they provide timely and easy to understand guidance on Covid-19 and local restrictions to those with a disability, impairment or sensory loss, in line with the aims of the Accessible Information Standard.<sup>56</sup>**

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<sup>56</sup> It is the law for the NHS and adult social care services to comply with the Accessible Information Standard. See further information: <https://www.england.nhs.uk/ourwork/accessibleinfo/>.

# Conclusions & recommendations

While the rollout of the Covid-19 vaccine provides long-awaited hope that the pandemic and the shattering impact it has had on lives across the UK will soon be over, it is clear that the need for Covid-19 restrictions has not gone away yet.

With the introduction of new strains of coronavirus to the UK, and hospital admissions in January 2021 exceeding the numbers seen throughout the pandemic, the need for restrictions looks set to continue for the foreseeable future. This will mean a continuation of the myriad of challenges seen in this research, from the financial and emotional distress experienced by people living under ongoing restrictions, to a general lack of awareness of how to access the right support at the right time.

This research reveals vital insight into the impact of Covid-19 restrictions both local and national on people's finances and mental health, and highlights a number of key areas national government, local authorities, health bodies and VCS organisations must focus on in order to minimise the impact of ongoing restrictions.

It makes the case for improved and more inclusive support and information under local restrictions. Ensuring people are adequately supported to follow the rules in areas with high Covid-19 prevalence will not only help to suppress the virus but help to ensure these communities are not left behind as we look to build back better.

To achieve this, governments across the UK and their partners should take the following actions.

## Mental health & wellbeing under local restrictions

- Governments across the UK should ensure local health systems have the capacity, resources and skills to meet the mental health and emotional support needs of those most at risk. This should include those living alone, the clinically vulnerable and clinically extremely vulnerable, as well as their carers and others in their household.
- Governments should support local authorities to provide advice and information about how to overcome loneliness and support friends and family members that may be struggling emotionally. This should always be published alongside communications and correspondence about restrictions in place locally, and should include information about support available in the local area.
- Emergency response partners, including local authorities, the NHS and the voluntary and community sector, should work together to offer psychosocial support, including support with loneliness, to anyone being advised to shield, take extra precautions or self-isolate.
- Government departments should work together to attach psychosocial support to other public services that are likely to encounter those most in need (such as those accessing mainstream benefits, and local authority emergency food support).
- Governments should ensure that local restrictions guidance continues to allow support bubbles for single person households, and meeting an individual from another household outdoors, as long as it continues to be safe. These exceptions should be promoted clearly in guidance and wider communications to ensure people do not restrict themselves from permitted interactions that could have significant benefits for their mental health.

## Financial security under local restrictions

- Governments across the UK should ensure emergency financial support is available and promoted through local welfare assistance schemes, with appropriate investment across the four nations. These should be made available to people who have No Recourse to Public Funds.
- In England, the Department for Work and Pensions should invest at least £250 million per year in local welfare assistance over the longer-term, to give local authorities the confidence and certainty they need to develop an effective local welfare offer. National standards and guidance on how schemes are run and promoted are needed.<sup>57</sup>
- Governments should review and rapidly improve self-isolation payment schemes so that the criteria are simplified and relaxed to ensure that anyone on a low income, or anyone who would experience financial hardship as a result of self-isolating, can easily access them.
- Governments should provide support to those who are struggling to pay their utility bills during Covid-19 and consider extending the Winter Fuel Payment to all vulnerable groups, such as those entitled to certain benefits.
- The Home Office should increase Asylum Support rates in line with the £20 per week increase to Universal Credit and enable ASPEN cards to be used online.

## Barriers to accessing support under local restrictions

- Local authorities should identify areas and individuals most at risk to target support. This should be achieved by partnering with the voluntary and community sector and local communities, using tools such as the British Red Cross's Vulnerability Index.<sup>58</sup> When additional restrictions are put in place in local areas, practitioners should attempt active outreach to individuals not currently in receipt of support.<sup>59</sup>
- Governments across the UK should ensure that those living under additional restrictions receive a level of support tailored to meet their individual needs, addressing both the access and cost implications for those who are vulnerable. This should specifically support those struggling to afford essentials, such as food, and those who take the decision to shield.
- Governments should ensure that all local authorities are fully resourced to continue to support the clinically vulnerable, clinically extremely vulnerable and non-shielded vulnerable, with access to essentials such as food. Emotional support, such as for loneliness, should also be attached to this provision.
- Governments should resource the voluntary and community sector to continue to support people with their practical and emotional needs during Covid-19 and in recovery.

57 There are significant differences in how local authorities run their local welfare schemes in England, and research by The Children's Society found that 1 in 7 areas had no scheme in place at all. Many are also poorly publicised and may involve highly opaque and onerous processes for applicants. Government guidance should ensure funding is effectively spent and there is greater consistency in provision across areas. See further recommendations on Local Welfare Assistance best practice: <https://www.childrenssociety.org.uk/sites/default/files/2020-12/Utilising-the-COVID-Winter-Grant-Scheme-to-strengthen-Local-Welfare-Assistance.pdf>.

58 The British Red Cross has developed a Vulnerability Index, which is being piloted by some local authorities to target areas of greatest need: <https://britishredcrosssociety.github.io/covid-19-vulnerability/>. This might include: BAME people, single parents, people in lowest-paid occupations, people in receipt of benefits, people with a long-term health condition/disability, care workers, people with low savings, especially self-employed, families with dependent children, people with no recourse to public funds, asylum seekers, and people affected by domestic violence.

59 For example, organisations can request support from the Voluntary and Community Sector Emergencies Partnership online: [vcsep.org.uk/request-support](https://vcsep.org.uk/request-support).

## Accessing & understanding information about local restriction rules

- Governments across the UK should keep tiered or level systems as consistent as possible to avoid confusion and motivate people to follow the rules.
- Central and local government should ensure any guidance on the rules and restrictions during coronavirus is provided in multiple languages, as standard. This should be based on an assessment of local language use and be funded appropriately by central government.
- Local authorities should regularly disseminate information both online and offline that is easy to interpret and tailored to the local community. This should set out clear advice for clinically vulnerable and clinically extremely vulnerable people about what they can do, while staying safe. To complement this, local authorities should work with voluntary and community sector organisations, including grassroots organisations and community members, to proactively target information and advice to people who are digitally isolated, clinically vulnerable and clinically extremely vulnerable, and who speak English as a second language.
- Governments should establish effective early warning systems for local emergency response partners, including local authorities, health bodies and the voluntary and community sector, in areas that are about to enter into new or additional local restrictions, in order to enable an effective human-centred response.
- Governments should ensure they provide timely and easy to understand guidance on Covid-19 and local restrictions to those with a disability, impairment or sensory loss, in line with the aims of the Accessible Information Standard.<sup>60</sup>

<sup>60</sup> It is the law for the NHS and adult social care services to comply with the Accessible Information Standard. See further information: <https://www.england.nhs.uk/ourwork/accessibleinfo/>.





# Appendix I: Restrictions under different Tiers and Levels and Guidance for Clinically Extremely Vulnerable (CEV)

## England

TIER 1	TIER 2	TIER 3	TIER 4
You can meet people indoors and outdoors, in groups of up to 6 people.	You cannot meet anyone you do not live with, indoors. You can meet with up to 6 people outside.	You cannot meet anyone you do not live with, indoors and in private gardens. You can meet with up to 6 people outside but only in public venues.	You cannot meet anyone you do not live with or are not in a support bubble with, indoors and in private gardens. You can only meet one person outside in public space.
Businesses can largely remain open, with Covid-19 secure measures.	Businesses can largely remain open, with Covid-19 secure measures.	Businesses can largely remain open, with Covid-19 secure measures.	Non-essential retail must close.
Hospitality and entertainment can largely remain open, with Covid-19 secure measures until 11pm.	Hospitality and entertainment can largely remain open, with Covid-19 secure measures until 11pm.  Pubs and bars must close, unless operating as restaurants. Hospitality venues can only serve alcohol with substantial meals.	Hospitality and entertainment venues must close. However takeaway and delivery services are permitted.	Hospitality and entertainment venues must close. However takeaway and delivery services are permitted.
Public attendance at outdoor and indoor events is permitted, with reduced capacity.	Public attendance at outdoor and indoor events is permitted, with reduced capacity.	Outdoor and indoor events are not permitted.	Outdoor and indoor events are not permitted.
Public attendance at spectator sport is permitted, with reduced capacity.	Public attendance at spectator sport is permitted, with reduced capacity.	Public attendance at spectator sport is not permitted.	Public attendance at spectator sport is not permitted.
Places of worship are open.	Places of worship are open, but you must not socialise outside your bubble or household.	Places of worship are open, but you must not socialise outside your bubble or household.	Places of worship are open, but you must not socialise outside your bubble or household.
Weddings and funerals can be organised with limited numbers (15).	Weddings and funerals can be organised with limited numbers (15).	Weddings and funerals can be organised with limited numbers (15).	Weddings and funerals can be organised with limited numbers.
Outdoor sport continues.	Outdoor sport continues.	Outdoor sport continues, but higher-risk contact activity should not take place.	Outdoor sport or recreation is only permitted with members of your household or support bubble.
Indoor sport continues, with the rule of 6.	Indoor sport continues, but only mixing with a household and bubble.	Indoor sport continues, but only mixing with a household and bubble, and organised activity such as exercise classes cannot take place.	Indoor sport is not permitted.

*When travelling to a higher tier, you follow the rules of that tier. If travelling to a lower tier from a higher tier, you must continue to follow the rules of the higher tier. Travel to, travel from, and stays in tier 3 are to be avoided.<sup>61</sup> If you live in a Tier 4 area, you must not leave your home and you must not leave your Tier 4 area unless you have a reasonable excuse (e.g. for work, exercise or education purposes).*

<sup>61</sup> Department of Health & Social Care, Local restriction tiers: what you need to know (last accessed 19 December 2020) <https://www.gov.uk/guidance/local-restriction-tiers-what-you-need-to-know>

Scotland<sup>62</sup>

LEVEL 0	LEVEL 1	LEVEL 2	LEVEL 3	LEVEL 4
You can meet people indoors and outdoors, in groups of up to 8 people indoors of 3 households, and 15 outdoors of 5 households.	No in-home socialising. Max 6 people from 2 households can meet in indoor public places and 8 people from 3 households outdoors.	No in-home socialising. Max 6 people from 2 households can meet in indoor and outdoor public places.	No in-home socialising. Max 6 people from 2 households can meet outdoors and in public places, e.g. hospitality settings.	No in-home socialising. Max 6 people from 2 households can meet outdoors and in public places.
Businesses can largely remain open, with Covid-19 secure measures.	Businesses can largely remain open, with Covid-19 secure measures.	Businesses can largely remain open, with Covid-19 secure measures.	Businesses can largely remain open, with Covid-19 secure measures.	Non-essential retail closed. Click and collect outdoor retail permitted.
Hospitality and entertainment can largely remain open, with Covid-19 secure measures.	Hospitality and entertainment can largely remain open, with Covid-19 secure measures. Hospitality must close by 22:30.	Hospitality and entertainment can largely remain open, with Covid-19 secure measures. Hospitality indoors must close by 20:00, 22:30 outdoors. Alcohol only with a main meal.	Hospitality and entertainment can remain open. Hospitality must close by 18:00, and alcohol cannot be served.	Hospitality and entertainment is closed.
Events can continue, with Covid-19 secure measures. Indoor grouped standing events are not permitted.	Events can continue with Covid-19 secure measures. Outdoor grouped standing events are not permitted.	Events are generally not permitted, apart from drive in events.	Events are not permitted.	Events are not permitted.
Places of worship are open (max 50 people)	Places of worship are open (max 50 people).	Places of worship are open (max 50 people).	Places of worship are open (max 50 people).	Places of worship are open (max 20 people).
Weddings and funerals can be organised with limited numbers (max 50 people).	Weddings and funerals can be organised with limited numbers (max 20 people).	Weddings and funerals can be organised with limited numbers (max 20 people).	Weddings and funerals can be organised with limited numbers (max 20 people).	Weddings and funerals can be organised with limited numbers (max 20 people).
Outdoor sport continues.	Outdoor sport continues.	Outdoor sport continues.	Outdoor sports continues, except contact sports.	Outdoor sports continues, except contact sports.
Indoor sport continues.	Indoor contact sport not permitted.	Indoor contact sport not permitted.	Indoor sport limited to individual exercise only.	Indoor gyms closed.
Work from home advised for office workers, other workplaces are open.	Only essential workers to attend an office, other workplaces are open.	Only essential workers to attend an office, other workplaces are open	Only essential workers to attend an office, other workplaces open with enhanced protective measures in place.	Only essential workers to attend an office, outdoor workplaces, construction and manufacturing workers allowed.

*Essential travel only to/from level 3 or 4 areas in Scotland, and to/from rest of UK. Follow rules and advice on international travel.*

62 Scottish Government, Coronavirus (COVID-19): local protection levels (last accessed 19 December 2020) <https://www.gov.scot/publications/coronavirus-covid-19-protection-levels/>

## Guidance for people who are Clinically Extremely Vulnerable (CEV) by tier in England<sup>63</sup>

	<b>TIER 1: MEDIUM</b>	<b>TIER 2: HIGH</b>	<b>TIER 3: VERY HIGH</b>	<b>TIER 4: STAY AT HOME</b>
<b>Socialising</b>	<p>When seeing people outside of your household or support bubble do not meet in a group more than 6</p> <p>Maintain strict social distancing, meeting outside where possible and keeping the number of people you meet low</p> <p>Always stay at least 2 meters from people visiting your home</p>	<p>Do not meet with people indoors unless they are in your household or support bubble</p> <p>Limit group meetings to 6 and this should only be done outdoors, including in a private garden</p>	<p>Stay at home as much as possible (aside from for outdoor exercise)</p> <p>Maintain social distancing with your household if possible</p> <p>Can only meet with people outside of your household or support bubble in certain outdoor places.</p>	<p>Shielding active. Significantly reduce social contact.</p> <p>Stay at home as much as possible, except to go outdoors to exercise or attend health appointments.</p>
<b>Work</b>	<p>Work from home where possible</p> <p>If unable to work from home the advice is to go into work, providing the employer has made reasonable workplace adaptations to become 'Covid secure'</p> <p>Explore eligibility for Statutory Sick Pay, Employment and Support Allowance, Universal Credit or the Coronavirus Job Retention Scheme (furlough)</p>			<p>Do not attend work (unless it is possible to work from home)</p> <p>Explore eligibility for; Statutory Sick Pay, Employment and Support Allowance, Universal Credit or the Coronavirus Job Retention Scheme (furlough)</p> <p>Still attend work (where you cannot work from home) if you live with someone who is CEV</p>
<b>School</b>	<p>Children should continue to attend education setting (school) unless they are under paediatric or other NHS care and have been advised by a medical profession to not attend an education setting</p> <p>Children whose parent or carers are CEV should continue to go to school</p>			<p>CEV children who are on the shielded patient list should not attend school.</p> <p>Children who are not CEB but live with someone who is CEV should attend school</p>
<b>Going Outside</b>	<p>Outdoor exercise encouraged in all tiers</p> <p>Consider going to shops and the pharmacy at quieter times of day</p> <p>Always wear a face covering (unless exempt)</p> <p>Utilise support networks to access food and medicines (including the NHS Volunteer Responders)</p>			<p>Advised not to go to shops or pharmacies (government support available if needed)</p> <p>Outdoor exercise encouraged at a safe distance</p>
<b>Travel</b>	<p>Walk or cycle where possible</p> <p>For longer journeys try to minimise the amount of people you come into contact with. Travelling by car is likely to mean fewer social contacts than using</p> <p>Avoid sharing a car with people outside of your household or support bubble</p>	<p>As with tier 1 and in addition:</p> <p>Minimise travel and avoid busy routes and times</p> <p>Avoid travel where possible unless for essential purposes</p>	<p>As with tier 1 and in addition:</p> <p>Do not travel outside of tier 3 area unless for specified reasons (work/ medical treatment)</p> <p>Reduce number of journeys and limit these to essential trips</p>	<p>Avoid all non-essential travel</p> <p>Travel for hospital and GP appointments (unless told otherwise)</p>

<sup>63</sup> UK government, (22 December 2020), Guidance on shielding and protecting people who are clinically extremely vulnerable from COVID-19; <https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19>

## Guidance for people who are at the highest risk from Covid-19 by level in Scotland<sup>64</sup>

	LEVEL 0	LEVEL 1	LEVEL 2	LEVEL 3	LEVEL 4
<b>Socialising</b>	Follow advice for general population		Reduce the number of people/ households who you have contact with  Avoid one metre zones	Avoid meeting people in indoor public spaces  Limit meeting people outside of own household	Minimise contact with people outside of own household
<b>Work (where you cannot work from home)</b>	Attend work following a workplace risk assessment and once employer has made reasonable adjustments to protect you		Attend work following a workplace risk assessment and once employer has made reasonable adjustments to protect you  Discuss any concerns with employer	Speak to employer to ensure all appropriate protections are in place  Discuss any concerns with employer	Discuss any concerns with employer  Where not possible to make the workplace safe do not attend work – the Chief Medical Officer will issue guidance and documentation to support this  Level 4 does not mean you should automatically attend work
<b>School</b>	Follow advice for general population			Parents or guardians should discuss with clinician whether children should still attend education setting	Children on the shielding list should not attend school in person
<b>Going Outside (including to the shops)</b>	Strictly follow the guidelines when shopping			Strictly follow the guidelines when shopping  Shop at quieter times  Limit the number of times you go to the shops	
<b>Travel</b>	Follow advice for general population				Do not take public transport

64 Scottish Government, Extra protection level advice for people at highest risk from coronavirus (COVID-19) (last accessed 22 December 2020) [www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2020/10/covid-19-scotlands-strategic-framework/documents/extra-protection-level-advice-people-highest-risk-coronavirus/extra-protection-level-advice-people-highest-risk-coronavirus/govscot%3Adocument/extra-protection-level-advice-people-highest-risk-coronavirus.pdf](http://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2020/10/covid-19-scotlands-strategic-framework/documents/extra-protection-level-advice-people-highest-risk-coronavirus/extra-protection-level-advice-people-highest-risk-coronavirus/govscot%3Adocument/extra-protection-level-advice-people-highest-risk-coronavirus.pdf)

## Appendix II: Case studies



### Case Study: James, 35-44, Leicester

James lives alone on the outskirts of Leicester. He has no friends or family nearby, and his son from a previous relationship lives with his ex-partner. James works full time for an IT company, but was put on furlough for three months over the summer. He describes living in Leicester this year as being under “the 100 day lockdown”, as his local area was placed into local restrictions immediately following the end of the first national lockdown.

James says that the communication around local restrictions wasn’t clear, and that he had to go on “15 different websites” to find out what the rules were in his area. He found the websites of local newspapers like the Leicester Post most useful in explaining the rules. Ideally, James would like all the information he needs to know to be clearly and concisely laid out in one single place.

James feels that he hasn’t been impacted as badly as others by local restrictions, but does struggle with the monotony of working from home and rarely seeing other people. The introduction of local restrictions had a substantial negative impact on his mood. When the UK was approaching the end of the first national lockdown, he could see “light at the end of the tunnel” and was hopeful that he might be able to do more things and see more people again. Learning that his area was to be placed under local restrictions was “really frustrating”. His typical week under local restrictions looks the same as it was under both national lockdowns, meaning that little has changed for him during the eight months since the pandemic began.



I feel like you do the same thing without fail daily. You wake up, do your work, you stop, you watch TV, you go to bed, you rinse and repeat. You can’t do much when you go out. It’s all just sit indoors. It’s like prison in a way.

The biggest challenge James has faced during local restrictions has been getting used to spending most of his time at home, while his office is closed. He describes this as “destroying his mental health” as he feels he has little reason to get up in the morning or follow a routine.

However, James found that when he started reaching out to other people over WhatsApp, and talking about his feelings, this helped him

cope. Some of these people are James’ friends who he previously lost contact with, and others are acquaintances he met through a Father’s support group. While spending so much time alone, James has found sharing his feelings with others through messages very helpful, and has tried to help others do the same in return.

Nevertheless, James says that he would be reluctant to access support for his mental health. This is because he feels uncomfortable opening up about how he is feeling and does not want to admit that he is struggling and needs help, due to his “pride”. He also feels more comfortable writing his feelings down in messages, rather than having to verbally explain how he is feeling over the phone. He thinks that services designed to support people who might be feeling like he is should not be framed as for ‘mental health’ as this could be off-putting for some.



Just needs to be something there where you can chat to someone generally. Maybe not framing it as a mental health thing, you just want to chat to someone. Someone a bit normal, no judgement.



## Case Study: Faith, 35-44, Swansea

Faith is a single mum in her 30s, living in Swansea. She is originally from South Africa and was an asylum seeker. She has been through a lot since arriving in the UK, including domestic violence and homelessness, and she appreciates now having a roof over her head and clothes for herself and her son. Faith didn't go out much even before Covid-19, as she has a young child and little income. Under local restrictions, she only leaves her house to take her son to school and to do food shopping once a week. Her friends don't live nearby and she has no family in the UK, but she keeps in touch with them over the phone.



Before Covid I relied on those friends . . . I don't have family around, I am the only person from my family who is in this country. It can take its toll sometimes but I've learned to live with it.

Faith is currently on benefits and income support. Now her son is at school she is looking for work, as she will lose her income support next year when he turns five. She would like to work but has felt that it has been difficult to find a job so far. She is not aware of support around finances, food or mental health being publicised under local restrictions. She says she is coping, but that if it was possible to get some support with groceries

that would be helpful, as she is just about managing to cover food bills at the moment. She loves food and wants to have good food, but in order to make ends meet she often has to make changes or cut things out, such as meat. She has got some food from a local food bank before, but says that the quality isn't great.

Faith makes a conscious effort not to watch the news as it is too negative and she doesn't want to hear how many people have died from Covid-19. When she wants to find out what the rules are and what's happening, she searches online. She also has a Facebook account where she follows the local council and government bodies for updates. Faith feels fairly informed about what is happening, but can sometimes feel unsure about some of the terms used and what "Tier" she might be under\*. The strictness of the circuit breaker lockdown in Wales came as a shock to her, and Faith found herself stuck trying to get home when the bus station closed at 6pm.

Faith finds it very confusing that there are different rules in different parts of the UK and that the different leaders of the UK share different messages. She doesn't think anyone is deliberately trying to be confusing, but she would like there to be awareness that not everyone listening to the updates is a native English speaker or understands what rules apply where.



My problem is, as not a British person, it gets confusing when someone is talking for England, Scotland and Wales – I take myself out of the confusion and focus on my local council.

"The government is not trying to confuse us [non-native speakers] when they speak, it's just that we start from a [lower] reception level to understand what is being said."

\* Faith lives in Wales, where there is not a Local Restrictions Tier system, unlike in England and Scotland.



### Case Study: Anwar, 35-44, Birmingham

Anwar is in his 40s, lives in Birmingham, and is a full-time carer for his mum. Anwar's Mum is classed as clinically vulnerable and Anwar himself had open heart surgery last year.

Birmingham went into Tier 2 of Local Restrictions in October. Anwar was happy that under local restrictions things were slightly less strict than under the national lockdown, and that support bubbles were allowed. This meant that he was able to see more people without feeling guilty. However, in general, the family have stuck to doing very little since the first national lockdown.

He feels the quality of information about local restrictions has been worse than for the first national lockdown. The news confused his family, as it felt like things were changing all the time “we can leave but then we can't enter, or we can't enter back in but we can leave . . . it was confusing”. Anwar has received a lot of information about how to stay safe during Covid-19 from a carers support group he attends, but this information doesn't make local restrictions any clearer for him.

Despite this, Anwar thinks there is a “lot more knowledge about what to do [to protect yourself] but in terms of actual support there is very little”. The council did send the family a letter saying “if you need us call us”, but when Anwar did call to try and sort out his Mum's blue badge, he didn't get a reply back for 14 days and the issue still hasn't been sorted.

Mental wellbeing has been a challenge for Anwar due to his increased isolation. He has felt depressed and unable to understand his emotions. Anwar is on medication for his depression and has online appointments with a psychiatric nurse. However, Anwar says that the support isn't the same over the phone as it is when having a face-to-face chat. He feels he is stuck at home, isolated and lonely. As his mum is over 70 and has seen on the news that older people are more at risk, she has become very fearful of going out and very “paranoid” about anyone coming into their home. The family have also lost an Auntie and other relatives to Covid-19.

The family's heating, electricity and food bills have increased due to them spending more time at home. Their Universal Credit payment was increased by £20 at the beginning of the year which helped. They have so far managed, but Anwar says that if he knew where to go for increased financial support, they might take it. However, Anwar thinks he would be more likely to ask his siblings for financial support, as he fears he would have to jump through lots of hoops to access any official support.



## Case Study: Rosie, 35-44, Glasgow

Rosie has been living in Glasgow for two years. She loves her area and finds the people very friendly. She's happy to have spent so long in one place, having spent a few years being moved around whilst she waited for the outcome of her asylum claim. She has no friends or family who live nearby, but she keeps in touch with people she met during the asylum process on the phone and through Zoom. Rosie has a number of serious health issues, including diabetes, so has been shielding since March, except when she has to go to medical appointments. Local restrictions have therefore made little impact on her, as she did not change her routines at all after the first national lockdown ended. Rosie is therefore unsure which Level of restrictions Glasgow is currently under.

Keeping busy while shielding has been very difficult for Rosie, as she doesn't have a television, laptop or internet access in her flat. Her neighbour has let her use his WiFi, so she was able to access the internet through her phone. Rosie can't remember first hearing about local restrictions, but she does



I try as much as I can to understand rules. I generalise everything. I just know I have to stay home because I don't know. You never know. Tier this and Tier that, I really don't know, so I just no matter what I stay at home. Just a total lockdown on my end.

regularly read the news on her phone on the BBC, The Mirror and other sites. Rosie also received a text from the Home Office telling her that a local lockdown was being introduced, as well as a letter from her housing association. The community practitioner at her GP surgery has also been very helpful in making sure that Rosie has all the information she needs. Overall, due to concerns about her health and uncertainty over the specific rules of local restrictions, Rosie has decided to just stay at home as much as possible.

Rosie is also concerned about how people who are not as confident in their English as she is are able to follow and understand local restrictions.

Fortunately, Rosie has been able to access support which has ensured she has been delivered food throughout the pandemic when she has not been able to go out. Rosie was already involved with the British Red Cross before the pandemic, so when access to food became a challenge during lockdown, she was linked up with local community projects and food banks who deliver food to her every week.

It is the isolation and not seeing other people which Rosie has found most challenging. Rosie was used to being heavily involved with charities and groups related to asylum and really appreciates that these meetings have been moved online so she can still talk to people. Being in a new country, where she doesn't have relatives, online meetings and groups have been a vital lifeline during this time.



I can read and write, but when it comes to this Tier thingy, I'm having problems, so how about people whose English is not as good as me? All those people should be catered for, so they [people communicating local restrictions] need to do more. Everyone has a right to know what's going on and how to protect themselves, and they [people with weaker English] don't know the gravity of the pandemic.



It's not only giving people money, but talking to people, listening to people that's the biggest thing. Because if you can't share your problems it will kill you.





### Case Study: Karen, 35-44, Liverpool

Karen lives with her partner and three daughters, aged 9, 13 and 15. After Liverpool was first put into Tier 3 restrictions in October, Karen became very nervous that her daughters were still expected to go into school even with Covid-19 rates being so high. Karen spends most of her time in her house and is too nervous to go food shopping.

This year has been very difficult for Karen and her family financially. Being at home more often has meant that all their bills have increased and her benefits now often don't reach the end of the month. She thinks gas and electric companies could be more helpful and understanding when they know people are isolating at home. Karen is very thankful for the food vouchers from her daughter's school, but she has struggled to get them to work in some shops. She found it embarrassing to keep asking about the vouchers, so gave up in the end.

When the local restrictions came into place, Karen's worries about finances and the stress of having to spend more time alone brought on a bout of depression. Karen was unable to get out of bed for days and she felt overwhelmed. At one point, her family received a call from NHS Track and Trace telling them to isolate. This made Karen worry, as they were low on food in the house and she didn't know how she was going to get more. Karen's family have never accessed food from a food bank before and didn't know how to go about it. When they rang a local food bank, they were told they needed a referral from the doctor. This made Karen panic as she didn't feel able to deal with the process. Karen was eventually directed to the British Red Cross Coronavirus Support Line, who were able to get food sent to her quickly and even called her back to check how she was doing. Karen says that, in general, she doesn't like letting people know that she is struggling as it feels "shameful and embarrassing".



I wouldn't ask anyone for anything but I was desperate.

Karen feels that when people are put under local restrictions or told to isolate, someone should check that they have food, gas and electricity in their homes. It would also be nice to get a call from someone asking how they are doing.

## The longest year: life under local restrictions

Wales briefing, February 2021

### Background

- The British Red Cross recommends in its new report, **The Longest Year**, that more needs to be done to ensure people facing hardship can access the practical, emotional and financial support they need under Covid-19 restrictions, local and national.
- This briefing summarises the report and sets out recommendations for the Welsh government and local authorities.
- It includes insights from qualitative and quantitative research exploring the experiences of people and organisations living and working in areas that have been under tighter local restrictions in Wales and across the UK.
- The Longest Year is the latest report from the British Red Cross's growing body of evidence around the impact of the Covid-19 crisis on people across the UK. It adds to **Access to food in emergencies** which examines food insecurity and **Lonely and Left Behind**, exploring the experience of loneliness among shielders and those who are 'chronically lonely'.

### Summary of recommendations

- We are calling on governments and councils across the UK to fully meet the humanitarian needs of the individuals and communities most vulnerable to hardship during Covid-19 restrictions, and in recovery.
- As in any emergency, everyone living under Covid-19 restrictions should have access to clear and accessible information, financial support, shelter, emergency food, psychosocial support and connections.
- To achieve this, the Red Cross recommends that the Welsh Government should:
  - Widen the criteria for the Self-Isolation Support Scheme to ensure maximum take up amongst those on low incomes.
  - Minimise the steps needed for people notified by the NHS Covid-19 app to access the Scheme.
  - Maintain increased investment in the Discretionary Assistance Fund and review issues around lack of awareness of the Fund.
  - Ensure that all local health boards have the capacity, resources and skills to meet the individual mental health, loneliness and emotional support needs of those most at risk of falling into crisis.

### About the report

- The Longest Year explores the experiences of people living and working under additional Covid-19 local restrictions in the UK.
- Twenty-three in-depth interviews were carried out with members of the public, and six in-depth interviews were conducted with professionals between October and December 2020, from across the UK. In Wales, this included one adult in Swansea and one adult in Cardiff.

- We also carried out polling with a nationally representative sample of 2,000 adults in the UK and boosted to a representative sample of 504 adults in Wales. Fieldwork was conducted from 8 to 22 December 2020.

## Our findings

### Mental health and wellbeing

- Both the qualitative and quantitative strands of this research suggest the biggest impact of living under local restrictions is on people's mental health. The most common triggers for this were isolation and feelings of loneliness.
- Whilst people from all backgrounds have been struggling with their mental health, this has particularly been the case for people living on their own and those caring for others.
- People said they valued single household support bubbles, describing them as a "lifeline."
- Too many people in Wales don't know where to go for help:
  - Over a third of people (37 per cent) disagree that they would be confident in knowing where to go for mental health or emotional support if they needed it under local restrictions.
  - Three in ten people (30 per cent) disagree that they would feel comfortable speaking to a professional or organisation about their mental health or emotional support needs, right now.
  - Half of people (50 per cent) agree that it is hard to talk about their problems when so many people are having a difficult time due to Covid-19.
  - However, almost three quarters of people (72 per cent) say they are confident that they can cope with such changes.

### The Welsh Government should:

- > Ensure that all seven local health boards have the capacity, resources and skills to meet the individual mental health, loneliness and emotional support needs of those most at risk of falling into crisis. This should include those living alone, the clinically vulnerable and clinically extremely vulnerable, as well as their carers and others in their household.
- > Ensure that everybody has the advice and information they need in order to overcome loneliness and support friends and family members that may be struggling emotionally.
- > Work with local authorities, the NHS and the voluntary and community sector to attach psychosocial support, including support for loneliness, to other public services that are likely to encounter those most in need, such as services providing food support.
- > Build on their commitment to support the development of social prescribing schemes, set out in the new Connected Communities Strategy, by rolling out social prescribing link workers across Wales. These link workers should prioritise supporting people who are chronically lonely to grow the confidence and independence they will need to reintegrate when measures are lifted.

## Financial security

- Those participating in this research had experienced a range of challenges under local restrictions, including recent and long-term unemployment; reduced income; difficulties making low income, benefits or asylum seeker support payments stretch to cover increased living costs; and food insecurity. This was having a significant negative impact on their mental health. Some of those we spoke to had to make extremely difficult decisions between paying an energy bill, getting food for the week, or buying clothes for their child.
- **Too many people don't know where to go for financial support**, with two fifths of people (41 per cent) disagreeing that under local restrictions, they would be confident in knowing where to go for this if needed.
- The uplift to **Universal Credit** and **Working Tax Credit** is welcome and should be extended to ensure that families can make ends meet and afford essentials while the economic effects of the pandemic are still being felt. Similarly, the income support schemes, such as the Self-Employment Income Support Scheme and the Coronavirus Job Retention Scheme (CJRS), should remain in place in order to support Covid-19 recovery. We welcome the recent extension of the CJRS until 31 March 2021.
- The Welsh Government has taken the welcome step to invest more in the **Discretionary Assistance Fund (DAF)** and to relax its rules. Between 18 March 2020 and 7 January 2021, there were 136,168 Covid-19 related Emergency Assistance Payments with a total paid value of £8.96 million<sup>1</sup>. However, evidence heard by the Equality, Local Government and Communities Committee highlighted that a lack of awareness of the scheme still exists for those eligible to claim<sup>2</sup>.
- Research by the Child Poverty Action Group into the replacement of free school meals has found that **cash** transfers provided directly to families have helped people make ends meet and avoid destitution while providing for dietary, religious and medical needs<sup>3</sup>.
- The **Self-Isolation Support Scheme** is a key form of assistance for people during local restrictions. Initial findings in Wales suggest that there is gap between the number of applications and successful awards, and a further gap between awards and completed payments. Up to Friday 11 December 2020, local authorities across Wales had received 9,041 applications, of which 4,616 were eligible for the Self-Isolation Payment, and 2,151 payments were made<sup>4</sup>.
- We welcome the Welsh Government's announcement that from February 2021, **Covid-19 App** users who have been notified as being exposed to the virus, are on low income and at risk of financial hardship are eligible to apply for the self-isolation support scheme<sup>5</sup>. This will expand the reach of the app in Wales<sup>6</sup> but the process can

<sup>1</sup> Welsh Government, Summary Data About Coronavirus and Response to it, 14 January 2020: <https://gov.wales/summary-data-about-coronavirus-covid-19-and-response-it-14-january-2021.html>

<sup>2</sup> Welsh Parliament Equality, Local Government and Communities Committee, 'Into sharp relief: inequality and the pandemic, August 2020 <https://senedd.wales/laid%20documents/cr-ld13403/cr-ld13403-e.pdf>

<sup>3</sup> Child Poverty Action Group, 'How cash transfers in lieu of free school meals helped low-income families cope during the first period of school closures' 18 June 2020:

<https://cpag.org.uk/policy-and-campaigns/report/cost-learning-lockdown-family-experiences-school-closures>

<sup>4</sup> Welsh Parliament, Written Questions, tabled 23 December 2020: <https://record.senedd.wales/WrittenQuestion/81792>

<sup>5</sup> Welsh Government, Press Release: Users of the NHS Covid-19 App now eligible to apply for £500 self-isolation payment, 1 February 2021: <https://gov.wales/users-nhs-covid-19-app-now-eligible-apply-ps500-self-isolation-payment>

<sup>6</sup> Paul Martin, BBC News, Covid in Wales: No grant despite NHS app isolation request, February 2021: <https://www.bbc.co.uk/news/uk-wales-55707833>.

be streamlined further to minimise the number of steps users have to take, including by verifying users as part of the app notification process.

**The Welsh Government should:**

- > Expand the criteria of the Self-Isolation Support Scheme to maximise its reach to people on low incomes, recognising the widened criteria in Scotland which has been extended to all workers earning the Real Living Wage or less, those in receipt of a council tax reduction and people with caring responsibilities for adults who meet the eligibility criteria<sup>7</sup>.
- > Ensure payments are issued in a timely manner.
- > Minimise the steps needed for people notified by the NHS Covid-19 app to access the Scheme.
- > Increase awareness of the DAF to inform people that they can make a claim for Covid-19 reasons.
- > Maintain increased investment in the DAF to ensure that families can make ends meet and afford essentials while the economic effects of the pandemic are still being felt.
- > Implement a cash-first approach to emergency assistance for families wherever possible, including in guidance to local authorities.

**Financial support for people seeking asylum**

- The people seeking asylum that took part in this research spoke of the difficulties making their asylum support payments of £39.63 per week stretch to cover their living costs.
- **Asylum support payments** were increased by £1.75 per week in June 2020, and by a further 3p in October 2020 (totalling £1.78), a significantly lower increase than the £20 uplift to Universal Credit.
- Asylum seekers' ability to spend this money is also restricted as a result of the fact that the **ASPEN** card, which is how asylum support payments are made, cannot be used online, and in some cases cannot be used to take out cash, either.
- In Wales, people who have **no recourse to public funds** (NRPF) status can access the DAF if they are experiencing destitution. This was in place before the pandemic. In light of Covid-19, increased investment has been provided for homelessness and rough sleeping. We welcome the Welsh Government's increased funding to help to secure accommodation and support for people experiencing homelessness, including those with NRPF status.

**The Home Office should:**

- > Increase Asylum Support rates in line with the £20 per week increase to Universal Credit and enable ASPEN cards to be used online.

**The Welsh Government should:**

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<sup>7</sup> More people supported to self isolate, Scottish Government, 2 February 2021: <https://www.gov.scot/news/more-people-supported-to-self-isolate/>

- > Continue to offer additional hardship support for people with NRPF status, such as providing additional funding to secure accommodation and support for people with NRPF status.
- > Review further support options for people with NRPF status, such as further financial support, mental health, and emotional support.

### Barriers to accessing support

- **Despite an increase in practical, emotional, and financial support needs under Covid-19 restrictions, for the most part people don't know where to turn for help.** This was particularly true for those who have never accessed support before, and professionals expressed concern about those who are digitally isolated.
- When asked what types of support, information or resources would have been helpful to them during the Covid-19 local restrictions, in Wales:
  - 34 per cent of people said healthcare or medical services.
  - 6 per cent said financial support for essentials such as food, clothes and toiletries.
  - 7 per cent said financial support for longer-term needs such as for unemployment, mortgage or rent payments.
  - 8 per cent said financial support to self-isolate would be helpful to them.
- **A third of people (33 per cent) in Wales disagree that they would be confident in knowing where to go for help getting food** if needed, if they needed to under local restrictions.
- The majority of participants in our research expressed reservations about seeking support, whether that be from local government, voluntary and community sector organisations or from family and friends. This was for a variety of reasons, including stigma, not wanting to burden others, fears of ineligibility, and a reluctance to use certain channels or services they had found unsatisfactory before.

### The Welsh Government should:

- > Ensure that all local authorities are fully resourced to continue to support the clinically vulnerable, clinically extremely vulnerable and non-shielded vulnerable, with access to essentials such as food. Emotional support, such as support for loneliness, should also be attached to this provision.

### Local authorities should:

- > Work with the voluntary and community sector to identify areas and individuals most at risk, to target support.

### Accessing and understanding information about local restriction rules

- People are struggling to access and understand information about local restrictions in their area.
- People whose first language isn't English were even more likely to struggle to understand information about local restrictions.

### The Welsh Government should:

- > Ensure any guidance on the rules and restrictions during Covid-19 is provided in multiple languages, as standard, based on assessments of local language use.
- > Ensure it provides timely and easy to understand guidance on Covid-19 and local restrictions to those with a disability, impairment or sensory loss in line with the aims of the Accessible Information Standard.

**Local authorities should:**

- > Work with voluntary and community organisations to regularly disseminate both online and offline, easy to interpret information that is tailored to the local community.



## Case Study: Faith, 35-44, Swansea

Faith is a lone parent in her 30s, living in Swansea. She is originally from South Africa and was an asylum seeker. She has been through a lot since arriving in the UK, including domestic violence and homelessness, and she appreciates now having a roof over her head and clothes for herself and her son. Faith didn't go out much even before Covid-19, as she has a young child and little income. Under local restrictions, she only leaves her house to take her son to school and to do food shopping once a week. Her friends don't live nearby, and she has no family in the UK, but she keeps in touch with them over the phone.

*"Before Covid I relied on those friends... I don't have family around, I am the only person from my family who is in this country. It can take its toll sometimes but I've learned to live with it."*

Faith is currently on benefits and income support. Now her son is at school she is looking for work, as she will lose her income support next year when he turns five. She would like to work but has felt that it has been difficult to find a job so far. She is not aware of support around finances, food or mental health being publicised under local restrictions. She says she is coping, but that if it was possible to get some support with groceries that would be helpful, as she is just about managing to cover food bills at the moment. She loves food and wants to have good food but in order to make ends meet she often has to make changes or cut things out, such as meat. She has got some food from a local food bank before but says that the quality isn't great.

Faith makes a conscious effort not to watch the news as it is too negative, and she doesn't want to hear how many people have died from Covid-19. When she wants to find out what the rules are and what's happening, she searches online. She also has a Facebook account where she follows the local council and government bodies for updates. Faith feels fairly informed about what is happening but can sometimes feel unsure about some of the terms used and what "Tier" she might be under\*. The strictness of the circuit breaker lockdown in Wales came as a shock to her, and Faith found herself stuck trying to get home when the bus station closed at 6pm.

Faith finds it very confusing that there are different rules in different parts of the UK and that the different leaders of the UK share different messages. She doesn't think anyone is deliberately trying to be confusing, but she would like there to be awareness that not everyone listening to the updates is a native English speaker or understands what rules apply where.

*"My problem is, as not a British person, it gets confusing when someone is talking for England, Scotland and Wales - I take myself out of the confusion and focus on my local council."*

*"The Government is not trying to confuse us [non-native speakers] when they speak, it's just that we start from a [lower] reception level to understand what is being said."*

*Faith lives in Wales, where there is not a Local Restrictions Tier system, unlike in England and Scotland.*



Ein cyf/Our ref: MA-JJ-0436-21

Llywodraeth Cymru  
Welsh Government

John Griffiths MS  
Chair  
Equality, Local Government and Communities Committee

17 February 2021

Dear John,

Thank you for your letter of 22 February allowing the opportunity for me to provide the Committee with an update on the progress made during the course of this Senedd term to prevent homelessness in Wales, and in particular our response during the Covid-19 pandemic.

The pandemic has presented the most extraordinary and unprecedented set of challenges, and we have seen the most incredible response from homelessness services to keep people safe. I therefore want to first take this opportunity to pay tribute to the tremendous efforts and continued hard work of all local authorities, third sector and other key partners in supporting some of the most vulnerable people in our society. There are some truly amazing people who work in homelessness and housing support services, to whom we owe an enormous debt of gratitude.

The continuing threat and spread of COVID-19 does of course continue to raise specific challenges for those who are, or are at risk of rough sleeping, and those who are in inadequate temporary accommodation. Our key housing priorities throughout this pandemic have therefore been to prevent homelessness, and to assist those who are homeless or insecurely housed, to ensure they are able to follow the public health advice in relation to social isolation and social distancing, safeguarding themselves and limiting the risk of wider infection.

### **Emergency Homelessness Covid-19 Response**

At the beginning of the pandemic, I made it clear that everyone who is, or is at risk of, sleeping rough or in inappropriate temporary accommodation should be provided emergency accommodation with the support they need. In March and April 2020, we published clear guidance, both statutory and non-statutory, to local authorities setting out our inclusive approach to support everyone into appropriate accommodation. This also specifically included those with No Recourse to Public Funds, asking local authorities to rely on alternative powers and funding to keep everyone safe during this public health emergency.

To enable local authorities to meet this policy aim, I initially made available additional funding of [£10m for local authorities](#), via the Hardship Fund, to facilitate appropriate levels of support, and to house vulnerable and displaced people. In August I announced an increase in the Local Authority Hardship Fund of £264 million to assist local authorities to prepare for the winter months, and this included funding to continue our emergency homelessness response. Our approach has therefore been in place continuously since the first lockdown and local authorities have been able to access funding to support it on a needs-led basis. On average, £1.6m per month is being claimed by local authorities to support this inclusive approach, which would equate to an additional £20m over the course of the year.

This approach has been extremely successful with nearly 6,000 people supported into emergency accommodation since March, together with the support they need to stay safe. The funding has enabled local authorities to secure appropriate accommodation and move away from the use of temporary night shelters. I have been clear that temporary night shelters should not be used as [evidence](#) clearly shows such communal spaces present a risk to both services users accessing them and staff working in them.

Welsh Government has also been working closely with local authorities since the start of the first lockdown, to offer support and assistance in the identification and procurement of additional accommodation capacity where required. This closer working has proved extremely beneficial to both Welsh Government and local authorities, and as a result a specific official is now assigned to each local authority homelessness team to assist in taking forward this agenda.

## **Phase 2 of the homelessness response**

In order to build on the progress made during the initial response to the pandemic, and to ensure no-one need return to sleeping rough, I announced the next phase of our homelessness response in the summer of 2020. Up to an additional £50m was announced to support this next phase and local authorities were asked to develop Phase 2 plans in order to bid for this funding. Local authorities were asked to develop Phase 2 plans in order to bid for this funding. We published clear [planning guidance to assist local authorities in developing their Phase 2 plans](#) The guidance was informed by the work and recommendations of the Homelessness Action Group to ensure we not only considered the short term requirements, but also grasped the opportunity to begin the transformational shift required to move to a rapid re-housing approach in Wales.

Local Authorities submitted plans which form the basis of how they plan to build additional capacity in support of this transformation. The majority of the funding, £40m, is capital and is supporting around 70 projects which will deliver new temporary and permanent homes. Our collective aim is to ensure that everyone we have brought into temporary accommodation is moved on to a permanent home.

## **Those with No Recourse to Public Funds**

Local authorities across Wales continue to accommodate those with No Recourse to Public Funds due to this public health emergency. In the meantime, we are continuing our work with a number of third sector organisations to support the further development of hosting schemes in Wales for those who have No Recourse to Public Funds. Two small-scale and short-term projects have been funded in Cardiff and Swansea to expand and professionalise existing services. We intend to strengthen our work in this area later in

2021. We also continue to fund Asylum Justice to ensure those with a realistic chance of securing their immigration status are supported to do so.

Since November 2020, we have been working with the NRPF Network to deliver training on migrant rights and entitlements to local authority staff across Wales. By March, 400 officers will have been trained on issues from NRPF support, to EU Settled and Pre-Settled status. Later this year we will also publish guidance for local authorities about how they can support individuals with No Recourse to Public Funds.

Whilst we continue to rely on alternative legal powers during this pandemic, in the longer term we remain subject to the restrictions imposed by UK Government legislation.

## **Data Collection**

Welsh Government has liaised closely with local authorities throughout the pandemic, including collecting management information to gain an understanding of the number of people being supported by the emergency homelessness response. This included the publication of ad hoc management information in [June](#) and [July](#). From August 2020 onwards, the gathering of data was formalised into a new monthly management information data collection. This collection includes additional information on the homelessness response, including the numbers moved into permanent accommodation every month and the numbers remaining in temporary accommodation at the end of each month. It should be noted, however, that the monthly data is still management information and subject to a number of caveats, including around the comparability of the data from month to month. The data is collected at an aggregate level and it is not therefore possible to track individuals.

The monthly data was published for the first time on 5 November 2020. The Committee will also wish to note that from 4 February 2021, we began publishing the rough sleeping data aspect of the monthly management information by local authority (from November onwards). The data for November and previous months is published here: <https://gov.wales/homelessness-accommodation-provision-and-rough-sleeping>

As this is a new data collection, which has been developed at pace during this pandemic, we continue to work with local authorities to determine how this can inform our wider considerations and work on the future of homelessness data. This wider work has necessarily slowed due to the pandemic, as our efforts have been focused on understanding the emergency response. However, the data collections during the pandemic will provide invaluable insights and learning to inform the next developments of this wider work.

## **Multi-agency working**

A strong focus of our response, as set out in all our guidance, is the importance of a multi-agency response and our funding has specifically supported the wrap-around support in addition to accommodation. I have previously discussed with the Committee the important role of substance misuse services and the work being undertaken in this area.

A Substance Misuse Deep Dive group has been established to help move forward three key areas for action: to improve the outcomes for individuals with co-occurring substance misuse and mental health; to support the removal of operational barriers to progress and the implementation of policy; and to ensure that suitable governance, including clinical governance, is in place to support progress.

A Substance Misuse and Mental Health Deep Dive meeting took place on 14<sup>th</sup> December 2020; the purpose of the meeting was to review the deep dive work plan. Due to the pandemic it was recognised that timelines on the actions have slipped, and the work plan is now being reviewed to capture additional actions and reassess the priority of those actions. Once this review has taken place a further meeting is planned. The group is chaired by the Deputy Director for Mental Health, Substance Misuse and Vulnerable Groups and the Homelessness prevention team are working collaboratively with the group to ensure that multi-disciplinary teams support individuals to address their needs in temporary accommodation and support improved access to public services.

## **Prevention of Homelessness**

Whilst a clear focus of our response has necessarily been on those already experiencing homelessness, we have not lost sight of the importance of prevention. The pandemic has brought about challenges for many people, particularly economic hardship. We have put in place a number of legislative changes aimed at keeping people in their homes and also alleviating pressure on front line support services such as local authority homelessness teams.

The legislative changes have focused on two matters: increasing the notice landlords are required to give when commencing the eviction process and, during the periods of greatest infection, preventing evictions being enforced by bailiffs. Notice periods were originally set at three months, under the Coronavirus Act 2020. Using powers provided for in the 2020 Act, notice periods are currently set at six months, with the exception of grounds relating to anti-social behaviour and domestic violence (please see my [oral statement](#) on 15 September 2020). The current regulations regarding notice periods expire on 31 March 2021 and consideration is currently being given as to the nature of any further regulations that will be needed.

Regulations preventing eviction were made to underpin a UK Government commitment that evictions would not be enforced during periods of local lockdown or over the Christmas period (again exceptions were included in relation to anti-social behaviour and domestic violence). The initial regulations, made under the Public Health (Control of Disease) Act 1984, expired on 11 January but further regulations were made that continue this protection. The need for these further regulations was reviewed on 18 January and it was decided they should be maintained. A [Written Ministerial Statement](#) was issued to that effect. The regulations will currently expire on 31 March 2021 but further three-weekly reviews will take place until then. Again, a decision will be taken nearer the time as to whether such protection is required beyond 31 March.

Unfortunately, it is likely that many people will experience difficulty paying rent as the pandemic continues. Officials are continuing to work closely with the private rented sector and social housing sector stakeholders to monitor the position and to understand where and how further mitigations or interventions may be required and possible.

There is an ongoing commitment from social housing landlords not to evict anyone in arrears due to financial hardship as a result of the pandemic. The landlords have also all agreed principles and protocols for person centred support for tenants who do find themselves in difficulties.

The principles, supported by more detailed protocols are to:

- keep tenants safe and secure in their home,
- help tenants get the financial support they need,

- support tenants and find solutions if they have difficulty paying rent, and
- do everything they can to support tenants' wellbeing.

Alongside the legislative changes, two schemes have been put in place to support tenants and landlords in the private rented sector through the pandemic:

- The Early Alert Scheme for rent arrears and other debt in the private rented sector, delivered by Citizen's Advice Cymru, is supporting the private rented sector by providing tenants with additional access to the advice and support they need to identify how they can maximise their income and manage their financial commitments. In addition, it will help tenants establish affordable repayment plans with their landlord or letting agent to address rent arrears and reduce the risk of them losing their home.
- I also announced the Tenancy Saver Loan Scheme - an £8 million loan scheme to help private rented sector tenants who are in rent arrears, or struggling to pay their rent as a result of Covid-19. The loans will be paid to landlords on behalf of the tenant who applies, and will be made available at 1% APR interest and will be repaid over a period of up to 5 years, which will make repayments affordable. Further information about the scheme can be found [here](#).

By the week ending 3 January 2021, 24 loans had been approved at a total amount of £47,054. This works out as a mean average payment of £1,961 per successful applicant. The payment is made directly to the landlord, on behalf of the applicant by a Credit Union.

Whilst uptake of the scheme is slower than expected, we are currently reviewing options to widen its scope. The Tenancy Saver Loan scheme is not the only support option available. I am committed to keeping the situation under review and have asked officials to review work closely with both tenant and landlord representative groups to ensure both respective views are duly considered. Whilst the Welsh Government is committed to reducing potential homelessness, it also understands that some landlords may also be experiencing a difficult set of circumstances also.

In addition to the above schemes, Welsh Government has produced a range of guidance documents for landlords and tenants, including where tenants and landlords can obtain help, financial or otherwise, in relation to [housing](#).

The Welsh Government works closely with many organisations, including those within third sector and is aware that illegal evictions are carried out, in the majority of cases, by unlicensed or rogue landlords. We have been actively working with partners to raise awareness of illegal evictions and consider how we can tackle this. Rent Smart Wales have updated the information on their website to make clear the legal process landlords should follow if progressing with legal action. They have also communicated this issue through their social media. Shelter Cymru has also recently secured funding to work with the Welsh housing sector, including local authorities, to develop and deliver two e-learning courses on illegal evictions.

Under the Housing (Wales) Act 2014, landlords can choose to become licensed, or appoint a licensed agent. Licensing involves mandatory training, and successful completion of a "Fit and Proper Person" test, which checks suitability for a licence, mainly taking into account any unspent relevant criminal convictions. Licenses last for five years from date of issue, but remain under constant review.

If a landlord tries to illegally evict a tenant, they could end up facing prosecution which could put their licence to operate in Wales at risk. Through the Rent Smart Wales process, tenants benefit from having a landlord or agent who should be aware of their legal responsibilities and act in accordance with them. Rent Smart Wales offer training alongside the registration and licencing process, and provide regular communications to help landlords keep up to date with their legal obligations.

Whilst Rent Smart Wales are responsible for enforcement for unregistered or unlicensed landlords and/or agents, the local authority is responsible for taking enforcement against landlords and/or agents who progress with an illegal eviction. This is through the tenancy relations officer or the housing and homelessness department.

Rent Smart Wales work closely with local authorities to ensure enforcement action can be taken on landlords and agents who break the law, protecting tenants and improving standards in the PRS. Where action has been taken against a landlord or agent in relation to poor standards it can, and has, resulted in the revocation of a licence.

In respect of the need to extend the increase in notice periods for 'no fault' evictions, I review this regularly, as with all my powers under the Coronavirus Act 2020. The next review will be undertaken in March 2021 and I will consider the correct course of action in light of the prevailing situation.

### **Next steps**

As you outline in your letter, the independent research into potential changes to priority need was published late last year. The impact of the covid-19 pandemic and the statutory guidance note we issued in April, specifically in respect of priority need, has had a considerable impact on its application in practice, and will need to be taken into account when considering next steps. Whilst I have been clear that there is no going back, our immediate focus is on the continuing response to the pandemic and given where we are in the Senedd term, potential longer term legislative reform will be a matter for the next administration.

The need for potential legislative reform is highlighted in the recommendations of the Homelessness Action Group. As you set out in your letter, I have already agreed to all the recommendations in principle and my officials are in the process of developing an Action Plan, working closely with key stakeholders, to take these forward. Whilst the work to develop and publish a specific action plan has been delayed by the impact of the pandemic, guidance issued during 2020/21 to support both the emergency response and subsequent action has been guided by both our [Strategy to End Homelessness](#), published in 2019, and the recommendations of the expert Homelessness Action Group. This has enabled us to collectively ensure that our emergency response is not simply about short term action, but is also helping to begin the transformational shift required in the provision of housing and homelessness services to achieve our goal of ending homelessness.

Our priority for the remainder of this Senedd term is to continue the ongoing emergency homelessness response, and continue to support local authorities and their key partners to deliver the next phase of the response to ensure those in temporary accommodation are able to move on to permanent homes, as part of the transformation of homelessness provision.

Whilst we are not yet out of the pandemic, we recognise the importance of building on the progress made this year. The high priority that Welsh Government places on this agenda is evident in the draft budget allocations, with an increase to the Housing Support Grant of

£40m to £166.7m in 2021/22. This reflects the importance of the Housing Support Grant as the key funding mechanism for homelessness prevention, and recognises the level of previously unmet need identified through the pandemic.

As outlined in the draft budget, this significant increase is intended to support the transformational shift required to move to a rapid re-housing approach. It will not only enable the commissioning of new service provision, but will also allow for the bolstering of existing provision and help to ensure high quality services that better meet demand, in line with the recommendations of the Homelessness Action Group.

One of the shining lights to come out of this dreadful pandemic has been the homelessness response, and there is so much learning that can be taken forward to ensure we build on what has been achieved to date. For example, the closer working with local authorities has meant that we have been able to better use the experiences of those at the forefront of our response to homelessness to inform policy and decision making in a much more responsive and agile manner. We have restructured our homelessness team in Welsh Government to embed this approach moving forward. The request in our initial guidance for local authorities to form co-ordinations cells with key partners has led to improvements in multi-agency working and fostered stronger partnerships for the future.

Whilst we recognise there is still much to do, this dreadful pandemic has presented us with an opportunity to accelerate the implementation of our homelessness strategy and move us closer to our longer term goal of ending homelessness.

Yours sincerely



**Julie James AS/MS**  
Y Gweinidog Tai a Llywodraeth Leol  
Minister for Housing and Local Government

# Agenda Item 8

By virtue of paragraph(s) vi of Standing Order 17.42

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