

## **Agenda – Local Government and Housing Committee**

---

Meeting Venue:

Committee Room 4, Tŷ Hywel

Meeting date: 18 September 2025

Meeting time: 09.15

For further information contact:

Manon George

Committee Clerk

0300 200 6565

[SeneddHousing@senedd.wales](mailto:SeneddHousing@senedd.wales)

### **Hybrid**

---

#### **Private pre-meeting**

09.00 – 09.15

#### **Public meeting**

#### **1 Introductions, apologies, substitutions and declarations of interest**

09.15

#### **2 Homelessness and Social Housing Allocation (Wales) Bill: Evidence session with the Cabinet Secretary for Housing and Local Government**

09.15 – 10.45

(Pages 1 – 31)

Jayne Bryant MS, Cabinet Secretary for Housing and Local Government, Welsh Government

Sarah Rhodes, Deputy Director Housing Policy, Welsh Government

Hannah Fisher, Head of Homelessness Prevention Legislation, Welsh Government

Julie Stokes, Lawyer, Welsh Government

[Homelessness and Social Housing Allocation \(Wales\) Bill](#)



[Explanatory Memorandum](#)

[Statement of Policy Intent](#)

Attached Documents:

Research brief

**3 Motion under Standing Order 17.42 (XI) to resolve to exclude the public from item 4 and 8 of today's meeting**

10.45

**Break**

10.45 – 10.55

**Private meeting**

**4 Homelessness and Social Housing Allocation (Wales) Bill:  
Consideration of key issues**

10.55 – 12.25

**Break**

12.25 – 13.10

**Public meeting**

**5 Building Safety Remediation**

13.10 – 13.55

Rob Nicholls, Welsh Cladiators

Geoff Spight, Welsh Cladiators

Mark Thomas, Welsh Cladiators

Peter Larwood, Welsh Cladiators

Marc Harries, Welsh Cladiators

Cara, Leaseholder

## **Break**

13.55 – 14.00

## **6 Building Safety (Wales) Bill: Evidence session 2**

14.00 – 14.45

(Pages 32 – 54)

Rob Nicholls, Welsh Cladiators

Geoff Spight, Welsh Cladiators

Mark Thomas, Welsh Cladiators

Peter Larwood, Welsh Cladiators

Marc Harries, Welsh Cladiators

Attached Documents:

Research brief

## **7 Papers to note**

14.45

### **7.1 Homelessness and Social Housing Allocation (Wales) Bill**

(Pages 55 – 62)

Attached Documents:

Paper 1: Homelessness and Social Housing Allocation (Wales) Bill – Letter from the Cabinet Secretary for Housing and Local Government to the Chair of the Legislation, Justice and Constitution Committee

### **7.2 Building safety**

(Pages 63 – 64)

Attached Documents:

Paper 2: Building Safety – Letter from the Cabinet Secretary for Housing and Local Government

### **7.3 Homelessness and Social Housing Allocation (Wales) Bill**

(Pages 65 – 112)

Attached Documents:

Paper 3: Homelessness and Social Housing Allocation (Wales) Bill – Letter from the Welsh Local Government Association

### **7.4 Forward work programme**

(Pages 113 – 129)

Attached Documents:

Paper 4: Correspondence from Public Health Wales on ‘Shaping the future of healthy housing for children and families in Wales

### **7.5 Inter-Institutional Relations Agreement**

(Pages 130 – 131)

Attached Documents:

Paper 5: Letter from the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip regarding the Budget Cover Transfer between UK Government, Department for Science, Innovation and Technology (DSIT) and Welsh Government to support digital inclusion activity in Wales

### **7.6 Building Safety (Wales) Bill**

(Pages 132 – 136)

Attached Documents:

Paper 6: Building Safety (Wales) Bill – Additional information from the Welsh Government

### **7.7 Legislative Consent: Absent Voting (Elections in Scotland and Wales) Bill**

(Pages 137 – 140)

Attached Documents:

Paper 7: Absent Voting (Elections in Scotland and Wales) Bill – Welsh Government response

### **7.8 Homelessness and Social Housing Allocation (Wales) Bill**

(Pages 141 – 143)

Attached Documents:

Homelessness and Social Housing Allocation (Wales) Bill: Paper 8:

Correspondence between the NRLA and the Chair of the Local Government  
and Housing Committee

**Private meeting**

14.45

**8 Building Safety (Wales) Bill: Consideration of evidence**

14.45 – 15.00

Document is Restricted

# Agenda Item 6

By virtue of paragraph(s) ix of Standing Order 17.42

Document is Restricted

Mike Hedges MS  
Chair  
Legislation, Justice and Constitution Committee  
Senedd Cymru  
Cardiff  
CF99 1SN

17 July 2025

Dear Mike,

Thank you for your letter of 27 June following my oral evidence to the Legislation, Justice and Constitution Committee's scrutiny session of the Homelessness and Social Housing Allocation (Wales) Bill. I am writing to provide you with the further information requested by the Committee.

I offered to provide the Committee with a note on the Welsh Government's intentions in relation to applying the duty to "ask and act" to primary care. This is attached at annex A.

### **Definition of "threatened with homelessness" and possession notices**

Thank you for drawing my attention to the evidence given to the Local Government and Housing Committee relating to the definition of "threatened with homelessness" and whether section 1(2)(a) of the Bill is broad enough to capture a range of possession notices, such as a serious rent arrears notice or breach of contract notice.

New section 55(4)(a) of the Housing (Wales) Act 2014 ("2014 Act") is intended to capture notices that require a person to give up occupation of their accommodation, whether fault-based or not. "Notice" in new section 55(4)(a) of the 2014 Act includes not only notices that may be served in relation to occupation contracts under the Renting Homes (Wales) Act 2016 ("2016 Act") but also notices that require a person to give up occupation of their accommodation, whatever the underlying arrangements. For example, it includes notices ending arrangements where a person resides with a landlord (which fall outside the definition of "occupation contracts" for the purposes of the 2016 Act) and it includes notices for possession served under Schedule 10 to the Local Government and Housing Act 1989 to end a long lease.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Jayne.Bryant@llyw.cymru](mailto:Gohebiaeth.Jayne.Bryant@llyw.cymru)  
[Correspondence.Jayne.Bryant@gov.Wales](mailto:Correspondence.Jayne.Bryant@gov.Wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

New sections 55(4)(b) and (c) of the 2014 Act, on the other hand, deal with scenarios where a person may be required to give up occupying their accommodation. Under section 55(4)(b), a person is “threatened with homelessness” if an application to the court has been made for a possession order. And under section 55(4)(c), a person is threatened with homelessness if it is likely that the person will become homeless within 6 months.

In relation to notices under the 2016 Act that do not of themselves require a person to give up occupation (e.g. a serious rent arrears notice), neither new section 55(4)(a) nor (b) of the 2014 Act will apply. Instead, under new section 55(4)(c) of that Act, a local housing authority would need to assess whether it is likely that the person will become homeless within 6 months, and if a notice has been served under the 2016 Act, that would be a relevant consideration for that purpose.

I am therefore of the view that new section 55(4)(a) when considered together with paragraphs (b) and (c) of that section meet the policy intention. They allow not only people who are required to leave their homes to access help under the Act, but also those who may be required to leave their homes in the near future.

### **Duty to “ask and act”**

In your letter you reference use of the term “considers” in relation to the proposed duty to “ask and act”, querying whether “has reason to believe” may be language better aligned to the 2014 Act.

Within the context of new section 94A of the 2014 Act, I do not believe that there would be a significant difference in meaning had we used “has reason to believe” instead of “considers”. The reason for using “considers” in this provision is for consistency with the language of section 213B of the Housing Act 1996, as (broadly) the same bodies will be subject to the duty to “ask and act” under new section 94A of the 2014 Act in relation to Wales and the duty to refer under section 213B of the Housing Act 1996 (“the 1996 Act”) in relation to England. There is, therefore, value in using the same language in both provisions.

You also note evidence suggesting that the duty on specific public authorities to “consider” in new section 94A(5)(b) and (c) could be stronger, and a duty “to provide” would be more robust from an enforcement perspective.

The duty in section 94A(5)(b) requires more than consideration of whether to take steps. Under that section, if a specified public authority considers that there are any other steps it could reasonably take to help the person secure or retain accommodation, it must take those steps. This allows the specified public authority to decide what steps might be appropriate to take. This is important as the actions required in relation to an individual will need to be considered on a case-by-case basis and the specified public authorities are best placed to make the assessment as to what steps should be taken (if any) in relation to a particular individual.

The duty in section 94(5)(c) is a duty to consider whether the specified public authority’s opinion that a person is homeless or threatened with homelessness affects the exercise of its functions in relation to the person. Again, how functions should be exercised in relation to an individual who may be homeless or threatened with homelessness will need to be assessed on a case-by-case basis and so, again, prescribing the particular things that should be provided or done in particular scenarios under this section would not be appropriate. The specified public authorities themselves are best placed to make this assessment and guidance will be provided to assist these considerations.

## **The deliberate manipulation test**

You also note that section 167A(2) of the Housing Act 1996, as inserted by section 36 of the Bill, inserts a deliberate manipulation test and suggests that new section 167A(2)(b)(ii) does not require the individual to have had any intent to deliberately manipulate the system. You refer to evidence provided to the Local Government and Housing Committee which queries whether the new test is too broad or sufficiently different to the intentionality test being removed by section 10 of the Bill.

The new deliberate manipulation test and the existing intentionality test are different in two distinct ways. The first difference is that the tests operate on different legislative systems. The test that is in section 77 of the 2014 Act is about entitlement to help for homeless persons under that Act, and removing that test meets the policy intention of not denying homelessness assistance to persons who may be intentionally homeless. New section 167A of the 1996 Act, on the other hand, is about entitlement to an allocation of social housing and the provision seeks to prevent persons from doing things or failing to do things for the purpose of improving their chances of being allocated social housing. No such test currently exists.

The second difference is that, although the tests appear similar, the test in new section 167A of the 1996 Act is narrower than the test in section 77 of the 2014 Act. New section 167A(2)(a) and (b)(ii) of the 1996 Act provide that a person is trying to manipulate the housing system if the person did something or failed to do something that led to them ceasing to occupy their accommodation and before doing that thing (or not doing it) they had advice that was intended to enable them to stay in their home. In other words, persons who are properly informed as to the potential consequences of their actions (or inactions) can be trying to manipulate the housing system, but persons who do something (or fail to do something) without being fully informed of the consequences of doing that thing (or not doing it) would not be trying to manipulate the system. This is in contrast to the test in section 77 of the 2014 Act, where a person could be intentionally homeless if they did something (or didn't do something) that led to them being homeless – regardless of whether they fully understood the consequences of their actions (or omissions).

I am of the view that the test in new section 167A meets the policy intention and sufficiently describes the acts or omissions that are intended to amount to trying to manipulate the housing allocation system (guidance will be an important tool in setting out further detail). I am content that the provision is not too broad; it is narrower than the test in section 77 of the 2014 Act that is being removed by the Bill.

### **“Shall” vs “Must”**

You also note that Schedule 1 to the Bill provides that local housing authorities in Wales "shall" have regard to guidance and provides that regulations made by the Welsh Ministers "shall" be made by Welsh statutory instrument and query why this term is used instead of "must".

Section 169 of the 1996 Act uses "shall" and the amendments to that section made by paragraphs 5(b) and 6(b) of the Schedule to the Bill use "shall" to be consistent with the language of that section (see also paragraph 7:30(2) of *Writing Laws for Wales*, which states that when amending existing legislation, it may be appropriate to use "shall" in text that will be inserted near to existing provisions that already use "shall" in the same way).

I hope this additional information aids your ongoing scrutiny of the Bill and I thank the Committee for your work on this Bill.

I am copying this letter to the Local Government and Housing Committee.

Yours sincerely,

A handwritten signature in black ink that reads "Jayne Bryant". The signature is written in a cursive, flowing style.

**Jayne Bryant AS/MS**

Ysgrifennydd y Cabinet dros Lywodraeth Leol a Thai  
Cabinet Secretary for Housing and Local Government

## Annex A

### Briefing paper in relation to applying the duty to “ask and act” to primary care contractors.

#### Overview

The list of specified bodies within the Homelessness and Social Housing Allocation (Wales) Bill includes a Local Health Board, but only in relation to individuals to whom it provides or arranges health care services that are not primary care contracted services (or where, in limited circumstances, Local Health Boards provide such services under the ‘managed practices’ approach). Services not within the remit of the Bill are General Medical Services (GMS), General Dental Services (GDS), Optometry Services and Community Pharmacy Services. These services are all contracted with Local Health Boards and operate as private businesses.

That said, there is a far wider provision of services outside of hospital or secondary care settings and whilst the contracted functions are outside of the remit, there are a number of services included in the wider umbrella of Primary and Community Care which are within scope as they are delivered by Health Boards. This includes services delivered by nurses, midwives and Allied Health Professionals (AHPs) who **work within multi-professional primary care clusters to deliver health and social care**. The inclusion of the Local Health Board means the duty will apply to, amongst others, urgent and emergency care, inpatient care and mental health and substance use services.

Primary Care contracted services are not included in the Bill because they are not public bodies and NHS Wales has a different, contractual based relationship with this element of health services. We do, however recognise the important role primary care services play in homelessness, and work is underway with health services to meet our policy objectives outside of the legislation.

#### Primary care focused work

*The Welsh Government has set out a requirement for health boards to develop strategic plans that articulate their approach to reduce inequity and improve the lived experience of vulnerable people (letter attached at annex b).* This includes the development of Inclusion Health Services to meet the needs of people traditionally excluded from mainstream services, which includes patients who are homeless or at risk of homelessness. [Planning support and resources](#) have been developed to support health boards to lead this work through community focused cluster planning and delivery of health and care that is inclusive of the needs of the most vulnerable individuals.

Resources include a [‘Blueprint for needs-based Services for Inclusion Health’](#) to assist GP practices to plan services to address the inequalities in health often seen by patients experiencing homelessness.

The Blueprint is informed by [NICE guidelines](#) which promote equitable access to primary care services. Emphasis is placed on the importance of integrated care which includes making a referral (with consent) to housing services.

Training and education are fundamental to changing systems and culture. Public Health Wales and the Strategic Programme for primary care have developed a programme of work to include inclusion health and homelessness in GP training schemes. Delivered by GPs, third sector organisations and people with lived experience of homelessness, the training is underpinned by evidence, data and approaches to identify and support people who present as homeless or at risk of homelessness. This includes making referrals to the local housing authority and other support services to prevent the escalation of poor outcomes.

The [Directed Supplementary Service – Homeless Scheme](#) can be used by health boards to strengthen local care arrangements through commissioning enhanced care from GPs, who ‘opt-in’ to provide this service. This includes a requirement to develop and produce an up-to-

date register within the practice to identify people affected by homelessness, a requirement to liaise with local statutory services and homelessness agencies and where appropriate, the development of joint protocols, and links with local urgent and emergency care units.

We consider this renewed focus on inclusion health in both secondary and primary care delivers on the policy intention to ensure people at risk of homelessness or experiencing homelessness are identified and referred to the local housing authority and relevant support services earlier.

**Annex B**

**Cyfarwyddwr Cyffredinol Grŵp Iechyd, Gofal Cymdeithasol a'r  
Blynyddoedd Cynnar / Prif Weithredwr GIG Cymru**



**Director General Health, Social Care & Early Years Group /  
NHS Wales Chief Executive**

**Llywodraeth Cymru  
Welsh Government**

To: NHS Wales Health Board Chief Executives

Our Ref: JP/RD/SB

26 March 2025

Dear Colleagues

**Guidance for the development of local Inclusion Service models**

A Healthier Wales has an ambition to build a society in which people's physical and mental wellbeing is maximised and in which choices and behaviours that benefit future health are understood.

The national milestone on healthy life expectancy is to increase the healthy life expectancy of adults and narrow the gap in healthy life expectancy between the least and the most deprived by at least 15% by 2050. However, inequalities in life expectancy and mortality remain wide and for the most vulnerable in our society life expectancy is significantly reduced and many years are lived in poor health.

Through our focus on understanding and improving health for communities it is important that we understand the needs of our most vulnerable citizens and that all services work together to plan seamless solutions that are tailored to individual needs. These developments should be proportionate to the scale and complexity of local needs.

Strategic plans must clearly articulate the approach to reducing inequity and improving the lived experience of vulnerable people to satisfy the Duty of Quality and Equity [The Duty of Quality in healthcare | GOV.WALES](#)

Under the IMTP / NHS Wales Technical Planning Guidance 2025/28 NHS organisations are expected to develop plans demonstrating:

- Clear and strong board level commitment to prevention and tackling health inequalities based on the 5 ways of working in the Well-being for Future Generations Act (long-term, prevention, collaboration, integration and involvement) and on Value in Health interventions.
- Developing Inclusion Health Services to meet the needs of vulnerable groups.

Resources have been developed to support Health Boards to lead this work, encouraging and supporting local collaboration to build community focused Cluster planning and delivery of health and care that is inclusive of the needs of the most vulnerable individuals.

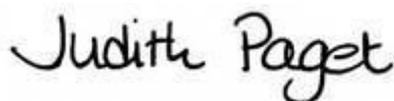
### [Planning Support and Resources - Primary Care One](#)

These include: -

1. Inclusion Health Planning Tool
2. Inclusion Service Development Guidance
3. Examples of good practice

The Maturity Matrix for Cluster Working also describes how this work can be developed. More effective service provision for vulnerable groups will improve outcomes, reduce inequity and make more effective use of resources. These are key priorities for public services in Wales. Progress will be monitored through Integrated Quality Planning and Delivery and Regional Partnership Board reviews.

Yours Sincerely

A handwritten signature in black ink that reads "Judith Paget". The signature is written in a cursive, slightly slanted style.

Judith Paget CBE

Eich cyf/Your ref  
Ein cyf/Our ref

[John.Griffiths@senedd.wales](mailto:John.Griffiths@senedd.wales)

30 July 2025

Dear John,

Last November, I reached out to offer an opportunity for those interested in the building safety programme to meet with my officials for a technical briefing. Following the interest in the remediation programme in the context of the recent introduction of the Building Safety (Wales) Bill, I would like to extend another invitation for you to meet with my officials for an update on our programme.

The meeting will provide an opportunity for you to hear more detail from my officials on progress with the remediation programme and discuss any issues or concerns you may have.

Should you wish to meet with my officials, please do not hesitate to contact [BuildingSafety@gov.wales](mailto:BuildingSafety@gov.wales).

Additionally, I am pleased to share with you that my officials will be hosting a number of drop-in engagement sessions over the coming months. These sessions are designed to provide an informal setting where leaseholders and residents can discuss fire safety related concerns and issues within their building, directly with members of the Building Safety Team. Here are the scheduled dates:

### August

- **6 August:** 11am-2pm. Community room, Asda, Cardiff Bay, Ferry Road, Cardiff, CF11 0JR.
- **20 August:** 11am-2pm. Tramshed Tech, Empire Room, Palace Theatre Building, 156 High Street, Swansea, SA1 1NE.

### September

- **17 September:** 11am-2pm, Tramshed Tech, Griffin Street, High Street, Newport, NP20 1FX.

If you could forward the drop-in session dates to anyone you think might be interested, I would be extremely grateful.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Jayne.Bryant@llyw.cymru](mailto:Gohebiaeth.Jayne.Bryant@llyw.cymru)  
[Correspondence.Jayne.Bryant@gov.Wales](mailto:Correspondence.Jayne.Bryant@gov.Wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

We have recently published our latest Building Safety Newsletter. If you haven't already subscribed to our Newsletter, I'd encourage you to do so. You can subscribe by clicking the link [here](#).

I look forward to your continuing support and partnership on what I know is a priority area for us all.

Yours sincerely

A handwritten signature in black ink that reads "Jayne Bryant". The signature is written in a cursive style with a large, stylized 'J' and 'B'.

**Jayne Bryant AS/MS**

Ysgrifennydd y Cabinet dros Lywodraeth Leol a Thai  
Cabinet Secretary for Housing and Local Government



# Agenda Item 7.3

Dr Chris Llewelyn

Prif Weithredwr / Chief Executive

Cymdeithas Llywodraeth Leol Cymru  
Welsh Local Government Association

Un Rhodfa'r Gamlas

Heol Dumballs

Caerdydd

CF10 5BF

Ffôn: 029 2046 8600

One Canal Parade

Dumballs Road

Cardiff

CF10 5BF

Tel: 029 2046 8600

Ein Cyf / Our Ref:

Dyddiad / Date: 15<sup>th</sup> July 2025

Ebost / Email: naomi.alleyne@wlga.gov.uk

Mr John Griffiths MS  
Chair of Local Government and Housing Committee  
Welsh Parliament  
Cardiff Bay

Via email

Dear John,

## **Request to provide additional evidence to the Local Government and Housing Committee as part of Stage 1 scrutiny of the Homelessness and Social Housing Allocation (Wales) Bill**

I recently met with Housing Cabinet Members across Wales to discuss the Homelessness and Social Housing Allocation (Wales) Bill and members shared a number of significant concerns about aspects and some specific proposals in the Bill.

Given local authorities hold the statutory duty on homelessness, and the biggest impact of the Bill in terms of implications for public sector bodies will be councils, members felt the need to seek another opportunity for local authority elected members to share their views with the Committee. We are aware that council officers provided evidence on 26<sup>th</sup> June, and we are supportive of the views and feedback they provided. However, the Committee has also received evidence from a number of other stakeholders and interested parties on the Bill, and we feel another evidence session for local government to share views at a political level, also reflecting on some of the views that have been expressed, would be helpful and reflect the critical role councils play and will play should the Bill be enacted. We would be happy to provide some additional written evidence, supported by case studies to exemplify our concerns, in advance of another session for consideration by members of the Committee.

You will be aware this is not a request that we have made before which hopefully reflects the seriousness with which members attach to this issue, and we would very much appreciate if you could consider this request positively. We appreciate it may not be possible to arrange a session prior to the summer recess but we hope that this could be arranged sometime in the Autumn, prior to the Committee finalising its scrutiny of the Bill.

I look forward to hearing from you.

Yours sincerely



Cllr Andrea Lewis

**WLGA Spokesperson for Housing and Deputy Leader of Swansea Council**

Cc: Jayne Bryant, Cabinet Secretary for Housing and Local Government  
Chairs of Finance Committee and Legislation, Justice and Constitution Committee

Cllr Andrea Lewis  
WLGA Spokesperson for Housing

18 July 2025

**Homelessness and Social Housing Allocation (Wales) Bill**

Dear Cllr Lewis,

Thank you for your letter of 15 July, which we discussed at our meeting yesterday. Members considered your request for local authority elected members to present oral evidence on the Homelessness and Social Housing Allocation (Wales) Bill, however I'm afraid we are unable to facilitate this due to time constraints.

We have a tight timetable for undertaking our scrutiny of the Bill in order to meet the reporting deadline set by the Business Committee. As such, our final oral evidence session with the Cabinet Secretary for Housing and Local Government has been confirmed for our next meeting on 18 September. This session cannot be deferred due to the time constraints mentioned and other legislative commitments.

Members noted that you are supportive of the views expressed by the local authority representatives on 26 June but we appreciate the implications of the Bill on local authorities and, as such, we would be happy to receive written information from you. The Committee's public consultation closed on 20 June, however we will be able to accept a written response from you. Should you wish to submit written evidence, we would be grateful if this be sent to the Committee Clerk by Friday 1 August.

Yours sincerely



John Griffiths MS

Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg. We welcome correspondence in Welsh or English.



**Dr Chris Llewelyn**

Prif Weithredwr / Chief Executive

**Cymdeithas Llywodraeth Leol Cymru  
Welsh Local Government Association**

Un Rhodfa'r Gamlas

Heol Dumballs

Caerdydd

CF10 5BF

Ffôn: 029 2046 8600

One Canal Parade

Dumballs Road

Cardiff

CF10 5BF

Tel: 029 2046 8600

Ein Cyf / Our Ref:

Dyddiad / Date: 1<sup>st</sup> August 2025

Gofynnwch am / Please ask for: Jim McKirdle

Ebost / Email: jim.mckirdle@wlga.gov.uk

Mr John Griffiths MS  
Chair for Local Government & Housing Committee

Dear John

Thank you for your letter of 18<sup>th</sup> July, in response to my request for an additional evidence session for elected members to provide their views on the Homelessness and Social Housing Allocation (Wales) Bill. The Committee's inability to accommodate this was disappointing however we have taken advantage of the offer to receive further evidence from local government to feed into the Committee's deliberations.

Please find attached a paper which sets out the main concerns councils have shared with the WLGA and asked they be shared with the Committee. This paper builds on our initial response to the consultation exercise on the draft Bill and is supported by additional information, shared by councils, that aims to set out how aspects of the Bill will impact on local authorities, the additional capacity and resources required for successful implementation, as well as some real life case studies that reflect the type of individualised approach councils need to take to support homeless people and those at threat of homelessness, but this also relies on the person working with the council to be successful. We hope this additional information will exemplify the issues and concerns raised in the paper.

I would wish to stress again that local government is supportive of the aims of the Bill of increased prevention, providing good quality temporary accommodation where needed for as short a time as possible through supporting and enabling people to find, move on and sustain permanent accommodation. This is an ambition that is shared with Welsh Government, as is the need to significantly increase the supply of housing, particularly social housing to meet the increased demand for homelessness services over recent years. Councils have been undertaking tremendous work to tackle homelessness, developing

innovative approaches and transforming their services and will continue to do so, and I hope the Committee will agree our commitment in this area is clear.

If you require any further information, please do not hesitate to contact me.

Yours sincerely



**Cllr Andrea Lewis**  
**WLGA Spokesperson for Housing and Deputy Leader of Swansea Council**

Cc: Jayne Bryant, Cabinet Secretary for Housing and Local Government  
Chairs of Finance Committee and Legislation, Justice and Constitution Committee

# **Homelessness and Social Housing Allocation (Wales) Bill (the Bill)**

## **Key messages and concerns from local government**

### **July 2025**

#### **Background**

- Local government share the ambition of the Bill and are already working hard to transform services to prevent and reduce homelessness, and where homelessness cannot be avoided, to ensure that any experience is brief, rare and non-recurrent.
- Over recent years, councils have faced and are facing significant homelessness pressures. The number of people in temporary accommodation, including the number of children and young people, have hit record highs over the past two years. This increase is due to a range of reasons including the legacy impact of the pandemic; the cost of living crisis that followed; changes in the housing market with higher rents and an overall reduction in the availability of properties in the private rented sector (PRS); increased numbers of migrants presenting as homeless; and most importantly, the fact that the development of housing, including affordable housing, has not kept pace with need.
- There have been significant increases in demand for services from homelessness and support services, aligned to both homelessness and temporary accommodation use reaching record levels in Wales during 2024. But councils and partners are finding there is also an increase in the complexities of need from some people seeking services and support. This can make it more difficult for councils to find suitable accommodation that can meet their specific needs. Ensuring safeguarding of an individual and wider residents are key considerations.
- With considerable efforts from, and progress made by councils, the numbers of households in temporary accommodation is finally showing a slight decrease over recent months, and we hope to see this downward trend continue as actions being taken now will deliver the improvements and reduced numbers of people presenting as homeless and living in temporary accommodation. Local government is concerned that the introduction of some aspects of the Bill, if not appropriately timed for implementation, risks adversely affecting and undermining this progress and will instead lead to further increased pressures on homelessness services and increased use of temporary accommodation.
- An increased pace and scale in the development of housing, significantly increasing housing supply is critical for the reduction in homelessness, particularly the need for more affordable housing in line with identified current and future need. More social and affordable housing will enable councils to continue on the path of homelessness prevention and reduction. Without significantly increased access to housing to move people to permanent from

temporary accommodation, even without any of the changes or additional duties and responsibilities set out in the Bill, risks undermining progress made so far and will lead to continued numbers of people presenting as homeless and living in temporary accommodation (and longer waits for those on social housing waiting lists).

- The high number of people experiencing homelessness and living in temporary accommodation has significantly impacted council budgets, both in terms of volume of cases and increased costs for accommodation. This has required identifying additional funding and shifting resource and capacity to respond to this growing demand. The workforce is committed to supporting people and preventing and reducing homelessness wherever they can, but they have also been overstretched with at some points, a relentless need for services. There have also been negative impacts and additional pressures on homeless and housing support services from budget and capacity pressures across wider social care and health services e.g. eligibility thresholds, access to services, case load management changes.
- Councils are also currently addressing a number of priority policy areas and initiatives in relation to housing, and these existing challenges, some of which are competing priorities in practice, need to be viewed in the round, and considered against a backdrop of challenging council, Welsh Government and public service budgets. These areas of work, which often interact and cannot be seen in isolation, and each affecting councils to varying degrees, includes: increasing the supply of affordable housing; meeting the revised Wales Housing Quality Standard, including achieving carbon reduction and net zero; the current consultation on rent levels for social housing; preventing and reducing homelessness, providing homelessness service and temporary accommodation; implementing of new legislation, duties and responsibilities such as the Renting Homes (Wales) Act; preparing for the new Building Safety (Wales) Bill, to name but a few significant programmes currently ongoing.
- There are a range of views from Councils on the detailed provisions contained within the Bill, and this paper aims to provide a summary of the key concerns. In addition, attached as Appendices are papers from Cardiff and Carmarthenshire Councils which capture more localised perspectives. We would draw particular attention to Cardiff's identification of "Real life impacts" and "how this provision may cause additional pressures" and illustrative case studies, as well as the "Impact and implications" and implementation recommendations identified by Carmarthenshire throughout their paper in relation to the various provisions of the Bill.

### **Specific proposals in the Bill**

- The statutory duty in relation to homelessness lies with councils. While councils work in close partnership with a range of support agencies, responsibility for accommodating and supporting homeless people and families lie with councils,

who are often left to provide services and support for homeless people, sometimes when others are unable or unwilling to do so. Councils have extensive and direct experience of how the homelessness system operates, and it is for this reason that councils feel compelled to highlight their concerns about some of the proposals in the Bill and potential unintended consequences that could hinder the current work ongoing to prevent and reduce homelessness. The intention is to ensure the Bill when enacted can be successfully implemented and supports councils to take the actions needed to achieve its policy intent.

### **Local Connection**

- Councils contend that the current local connection test is effective and does not need to be amended. There are identified exemptions to this test which councils believe are the right ones and these work in practice.
- The provisions in the Bill around local connection set out that Ministers would be given powers to make further amendments to specify criteria once the Bill has been implemented. Whilst the Bill acknowledges that feedback from councils was taken into consideration in relation to the initial proposal to remove the local connection test, these additional powers for Ministers allow for potential changes to exempt categories to this test. This could effectively allow for the local connection test to be removed gradually with the introduction of further categories at any time. This would be a contradiction to the stated policy intention of retaining the local connection test.
- If these powers remain, to ensure that Councils are not negatively impacted following any changes, it is suggested that the exercise of this power by Ministers should be supported by an impact assessment based on information and data collected from Councils.

### **Priority test and Intentionality**

- Councils strongly support the revised timescale in removing the priority need test but remain concerned that its eventual removal may result in increased demand for temporary accommodation and hinder the ability to prioritise the most vulnerable households.
- If the priority need test is to be removed, this needs to be at a point where the supply of affordable housing, and the resources available to Councils, have demonstrably increased to levels which allow Councils to fulfil the ambition of the legislation. Ensuring an adequate supply of one bed accommodation, in particular, to meet the needs of those in temporary accommodation will provide a very significant challenge in many areas. Councils would be happy to work with Welsh Government to clearly define what these increased levels of housing supply and additional resources would be.

- Taken alongside other proposals in the Bill, such as those related to responsibilities for developing, reviewing and implementing Personal Support and Housing Plans, the removal of the priority need test would add to the reduction or removal of individual responsibility for applicants to take actions to prevent their homelessness, or to find a solution to resolve their housing situation.
- There are clear views from Councils that the current intentionality test should be retained. The fact that the test is only formally applied in a small number of cases should not be misunderstood or misinterpreted. In some circumstances it is an important tool in clarifying expectations and options with those households being supported by Councils and their partners. The abolition of the intentionality test would be disproportionate, given the very low numbers of cases where applicants are actually determined to be intentionally homeless. As a valuable prevention tool, removal of the current test could, in some cases, result in less deterrent and a lack of consequences for repeated tenancy failure, such as failure to pay rent. The new Discharge of duty categories do not cover what was included in an intentionality test.
- The proposed deliberate manipulation test is not an effective replacement as it is applied at allocation stage, resulting in the unsatisfactory and expensive prospect of an applicant remaining in temporary accommodation for an extended period of time with no prospect of being able to access social housing. If an applicant is ineligible for social housing, one of the only move-on options would be the Private Rented Sector. With current low Local Housing Allowance (LHA) rates and extremely high rents, this is not an affordable option for many applicants.

### **Unreasonable failure to co-operate**

- Councils would like to see the ‘unreasonable failure to cooperate’ provision as contained in the Housing (Wales) Act retained and believe that limiting its use to cases involving property damage and abuse of staff is not in line with the Bill’s broader emphasis on people taking reasonable steps to resolve their housing situation, which may undermine personal responsibility and accountability, and may also lead to applicants feeling less compelled to take ownership of finding solutions to their housing circumstances.
- The new discharge of duty categories proposed do not appear to align with Renting Homes (Wales) Act requirements, and this will have implications for Councils who manage their own temporary accommodation. Homelessness duties can be discharged for certain behaviours, however the temporary accommodation provided which is attached to the duty cannot be easily ended as there is a lengthy legal process to follow. In addition, whilst the new discharge reasons specify ‘threatening behaviour to staff’, there is no consideration for threatening behaviour to other residents in temporary accommodation. Consideration is required in relation to the application of RHWA to temporary

accommodation, as this is currently causing significant issues for many Councils homelessness teams.

- While more regular intervals for reviewing Personal Support and Accommodation Plans, as specified in the Bill, may help in ensuring there is regular engagement and review of progress made on plans, both councils and applicants need to actively engage to make this process effective. Removing the ability to use this lever, as a last resort, to encourage, and where necessary require engagement, may lead to less compliance and following up of agreed actions, reducing the opportunity to make progress and achieve a positive outcome. Councils recognise the Welsh Government's commitment, in the Explanatory Memorandum accompanying the Bill, that this will be 'likely to take place in 2030-31 at the earliest', and a more robust commitment to working together collaboratively to phase in this change by 2030 or later would enable a collective effort towards significantly increasing supply and resources.

### **Ensuring all public services meet their proposed legislative duties to support councils in tackling homelessness**

- Councils are supportive of these proposals and believe preventing and tackling homelessness in a long-term sustainable way requires the active involvement of a full range of public and third sector bodies, with the support of our communities. While the statutory responsibility for homelessness rests with councils, supporting homeless people and those at risk of homelessness in a comprehensive and holistic manner, with the shared aim of creating positive outcomes for people, requires a full range of support services from other agencies, from mental health and substance misuse services to family and specialist support and advice services, education, criminal justice agencies and housing association partners.
- Councils would wish to see further detail of how this aspect of the Bill will be implemented in practice. It is also contended the Ask and Act aspects of the Bill should be strengthened to make the approach truly effective. Councils often experience a lack of appropriate support or acceptance of people for other support services needed at the current time and believe that issues of access to and availability of appropriate services will continue without further clarity of expectations. It is suggested that there should be an assessment of the capacity available across public services to undertake this role and play its part in tackling and preventing homelessness to provide assurance that the Bill's ambitions in this area are truly deliverable in practice.

### **Financial implications**

- As set out in the WLGA's Annual Financial Survey of councils<sup>1</sup>, net current spend on homelessness has increased from £10.8m in 2014-15 to £86.8m in 2024-25.

---

<sup>1</sup> [FIN6-02-25 P1 Welsh Local Government Association.pdf](#) (page 23 onwards)

The latest budget returns show that this figure has increased to £100.8m for 2025-26 which is a 16% increase. Welsh Government funding only provides some of this funding and councils are having to spend from their general fund to cover all costs, therefore risking impacts on other council services (for example, discretionary services) also in need of funding. There is significant concern across councils about the current financing of current levels of demand for homelessness services, let alone ensuring new duties and responsibilities under the Bill can be effectively implemented.

- The financial analysis of the impact of the Bill as a whole is detailed but also complex, not easy to decipher even for seasoned financial experts. The assumptions behind some of the savings seem optimistic, not only in their scale but also in the timing of when they might be realised. While some of the data has been provided by councils, the information supplied did not always reflect the final proposals in the Bill and therefore may undermine elements of the assumptions made in the financial assessment. Councils would wish to ensure that the actual costs of implementation are closely monitored, and discussions held with Welsh Government if costs are exceeding the level of funding provided. We believe it is necessary to agree how this information will be collected at this stage, at the beginning of the process and co-produced with local government. It is crucial that Welsh Government commit to fully funding the financial implications of the Bill on an on-going basis.
- Our experience with other legislation is that theoretical analysis of costs underestimate the real-world impact. On the benefits side, these estimates tend to contain an element of optimism bias that mean they are over-stated and impacted by real-world changes that arise from, for example, latent service demand. The 10 year timescale for assessing the financial impacts in 'present value' terms is helpful and is welcomed.
- Councils are fully supportive of the importance of preventing homelessness and recognises that this, along with reduced use of temporary accommodation will reduce current spend. However, along with increasing supply of social and affordable housing, this does not happen overnight. Aspects of the financial assessment are made on the assumption that the Bill will be successful in achieving higher rates of prevention and therefore a reduction in the use of temporary accommodation. Whether this approach is successful will depend heavily on whether the correct level of investment is made to increase capacity and transform homelessness services to the anticipated level; it is the difference between a theoretical assessment compared to the reality of delivery on the ground. Such assumptions as set out in financial assessments linked to proposed legislation do not always become true in implementing legislation as the following from a financial evaluation of the Social Services and Wellbeing (Wales) Act demonstrates, "It would be fair to conclude that the clarity and range of the Regulatory Impact Assessment for the Act – that the additional benefits of implementing the legislation would outweigh the additional costs of implementation over the long-term – has to be seriously questioned. This is

because there is no dataset currently available upon which a claim can be substantiated, and because the limited evidence that could be collected by this study suggests otherwise<sup>2</sup>.”

- There is also concern at aspects of the financial assessment that could affect the effectiveness of proposals, such as cooperation (of other public services). The assessment identifies that this “amendment should not increase caseload, in that it will not result in more people becoming entitled for services” but more an opportunity cost. However, council experience reflects that many services where councils could require cooperation, for example, access to mental health or substance misuse services, are already overstretched and are not always in a position to provide such cooperation at the scale or pace required. It is not believed that this amendment will significantly increase the benefit of such cooperation unless there is a clear commitment by partner bodies to prioritise homeless people within their own policies and processes or increased investment.

### **Additional contextual points**

- Should the Bill be enacted, in its current form or with amendments, councils are supportive of a phased timescale for implementation of the additional duties and responsibilities. This will allow time to undertake any required preparations, increasing capacity, training staff, changing services etc, and would allow more structured and planned approach to managing change to be able to implement successfully. Councils are not supportive of any suggestions to speed up the proposed timetable, nor to bring certain aspects of the Bill, such as the removal of priority need and intentionality, forward, and have been clear in their collective discussions that doing so would fundamentally compromise achieving the policy intention of the Bill.
- It is well understood and documented<sup>3</sup> that all councils are currently experiencing serious financial challenges; council budgets have not recovered from the long period of austerity and the public sector financial issues that have followed this. The increase in homelessness, the demand and cost of temporary accommodation has significantly impacted on budgets and has, in most cases, actual spend has exceeded the funding provide by Welsh Government. Any new duty or responsibility on local government under the Bill will need to be fully funded and should be based on an agreed assessment of additional capacity and funding (including for support services and to increase the supply of housing) that is needed to implement the changes effectively. There is no slack within existing budgets to meet any shortfall and without the required funding, it

---

<sup>2</sup> [evaluation-of-the-social-services-and-well-being-act-financial-and-economic-implications.pdf](#)

<sup>3</sup> [FIN6-02-25 P1 Welsh Local Government Association.pdf](#) (Housing and homelessness pressures set out from page 24)

will be extremely difficult to continue to meet demand and provide good quality, preventative and responsive services and support as required by the Bill.

- Local authority staff welcome the increased focus on prevention and working with homeless people to develop Personal Support and Housing Plans. Ensuring there is sufficient capacity in the workforce to take on these additional tasks, along with the necessary skills, will be crucial to its success. Recent reports, such as Cymorth's report, *Struggles on the Frontline*<sup>4</sup> and the Senedd's Local Government and Housing Committee<sup>5</sup> report both highlight the current pressures on homelessness and housing support staff, dealing with both increasing demand and complexity of the needs of people they are working with, leading to increased stress and potential burnout. Both reports also note the need to ensure the workforce is treated fairly, both in terms of recompense and support arrangements. Given the Bill will place additional requirements on the workforce, it is necessary to ensure the impact on the capacity of the existing workforce is identified so the Bill does not add to these pressures and enables additional capacity is available where needed to enable successful delivery.
- Councils would suggest that the Committee, as part of the scrutiny of the Bill, also considers its interaction with other legislation, such as the Renting Homes (Wales) Act (RHWA) and its potential impact on the ability of councils to make progress across a range and sometimes competing priorities on housing. It is felt by some that implementation of the RHWA has contributed to the increase of homelessness that has been experienced over the recent period due to PRS landlords leaving the market thus reducing the supply and affordability of private rentals.

## Conclusion

- All councils see housing and homelessness as key areas of service provision, with specialist officer teams working to support people with housing solutions and management of complex needs on a daily basis and many have housing and homelessness as one of their corporate priorities. Councils are focused on reducing homelessness and many are undertaking transformative approaches to address not only their homelessness situation, but also able to access other support services that may be required to assist people to successfully hold a tenancy and address other lifestyle issues that enable people to move on with their lives, with having a good quality and affordable place to call home.
- While councils are supportive of ambition of the Bill and recognise and welcome changes made to the proposals by Welsh Government since the White Paper, they remain concerned at the impact of the Bill if all clauses are introduced in its

---

<sup>4</sup> [Struggles-from-the-Frontline-Eng.pdf](#)

<sup>5</sup> [cr-ld17174-en.pdf](#)

current form. They are keen to maintain the improvements and progress made over recent years and build upon these.

Effective arrangements and structures for monitoring progress in relation to the implementation of all aspects of the Bill need to be put in place from the outset, supported by the capture and evaluation of comprehensive and meaningful data. Implementation timescales must be realistic and achievable, with ongoing and effective support for Councils which fully reflect the impacts on capacity and costs of implementation.

## Overview of how Cardiff Council already utilises the legislation to support people in the most effective way

While we support the overarching ambition to make homelessness rare, brief, and unrepeated, we are concerned that several provisions in the Bill risk undermining this goal through various means which are outlined.

It is also important to recognise that much of the Bill's intent aligns with work already underway in Cardiff which has been achieved without the need for new legislation. Since the pandemic, we have faced unprecedented demand which resulted in the Authority declaring a Housing Emergency in 2023. At its peak, our temporary accommodation estate expanded by 50%, with numerous hotels being utilised for the first time, and significant increases in the use of 'shared' or emergency spaces. In addition to this, housing demand across the city is exceptionally high, with more than 10,000 households on the waiting list for social housing and evidence of year-on-year increases of homeless presentations to the Authority. Despite these difficulties, Cardiff has made significant progress, where we have now:

- Closed two long-term hotel arrangements, with plans to close the remainder this year.
- Reduced reliance on shared accommodation by 120 units.
- Delivered hundreds of new or retrofitted self-contained units for temporary and supported accommodation.

This work has been made possible through a number of measures, such as strengthening prevention services city-wide, re-developing and branding our PRS team – LETS, and implementing a robust Rent Arrears Pathway. Additionally, Cardiff has been required to make significant changes to its allocations policy – reducing choice in the lettings system for homeless applicants and substantially increasing the number of lets to homeless households to increase the speed of move out of temporary accommodation (TA), and so aligns with Rapid Rehousing, making homelessness brief; without taking these steps, Cardiff risked a worsening housing crisis.

The combination of these efforts has led to a net reduction in temporary accommodation use for the first time since the pandemic, but our concern is that this progress is finely balanced. The number of people exiting temporary accommodation is for the first time since the pandemic marginally higher than those entering, but this is not by any significant margin. Any small tilt towards increasing the number of people entering homelessness services will put undue pressure on an already burdened service and may result in us having to increase our accommodation estate again. As we have seen, increases in estate size also has a direct impact on the length of stay for households due to the increased competition for permanent homes in the city which are finite.

We are deeply concerned that increases in demand risks reversing these gains and puts additional pressure on already stretched services – something which the Bill may inadvertently do. Cardiff urge Welsh Government to consider the unintended consequences of the Bill's provisions and to ensure that legislative changes support, rather than hinder, the principles of Rapid Rehousing and sustainable homelessness prevention.

## **Cardiff Case studies**

### **Surrendering Properties**

**A:** Family surrendered PRS accommodation due to noise nuisance from neighbours. Client was resistant to ask for the keys back from the landlord and to raise noise complaints with landlord/police when advised to do so by HOC Officers. Tenancy ended on 01/07/2025 and landlord wanted the client and family to leave at this point, but no formal notice was given. Family left property.

### **Prevented Case Studies**

**B:** Client presented due to disrepair in property and rent arrears. Rent Arrears had occurred due to an informal agreement with the landlord to decrease the rent while disrepair improvements were ongoing. Landlord also wanted the client out of the property (although also refused to give formal notice) and had been showing up at the property without prior notice and sending threatening messages.

Client eventually abandoned the property for six months to stay on her father's sofa due to lack of repairs being completed. During conversations with Prevention Officer, the landlord advised they were willing to take the client back. Throughout these 6 months, client was encouraged to move back to the property and landlord completed the necessary repairs to the property.

Client returned following completion of repairs and advised the property was to a good standard. Rent Rescue paid once client returned to the property, plus a bond of £500 and £100 'pet' fee to keep the client in the property.

**C:** Client presented due to notice from landlord due to landlord selling the property. Other issues cropped up during the assessment, including disrepair in the property, which led to the client deciding to withhold the rental top-up, accruing rent arrears. Prevention Officer noticed that Housing Benefit believed the rent to be lower than what it really was so encouraged the client to attend the Hub to amend this as client should be entitled to the full amount.

Following discussions with the Prevention Officer, the landlord decided not to proceed with the notice and would issue a new contract at a higher rent, which was deemed affordable to the client. The case was closed once a new contract was issued and client was encouraged not to pay the increased rental amount until repairs had been completed.

### **Case study D**

Client presented due to fleeing Domestic Abuse from husband. Client was an owner-occupier of the property they were fleeing from; joint mortgage with the perpetrator. Bail conditions were in place but were due to come to an end at the time of the Prevention Appointment; police refused to extend the bail conditions.

Advice was given by the Prevention Officer to join the General Waiting List (and subsequent advice for RISE to submit a re-banding request) and robust PRS/BRIA advice. Help was also provided during Review Appointments to search for PRS properties. Client found a PRS property and a B/RIA application was initiated, but a family member paid the B/RIA.

**To note**, Cardiff has purchased 32 properties where the tenants were threatened with homelessness due to the landlord needing sell. This allowed the household to remain in their property in a social housing contact. This has been especially helpful for complex health or medical cases, for cases where a member of the family is neurodivergent or for larger families.

### **Case study E**

MH is a 63 year old male known to homeless services since 2013. MH has had a significant number of placements in temporary accommodation, accessing almost all provisions in Single Person Gateway since 2013 and having a total of 40 placements. Many of these placements lasted just days, and MH faced multiple evictions or transfers as a result of his behaviour whilst in the Gateway. MH was known to have complex needs which included a history of alcohol dependency and was estranged from family.

As part of our efforts since the pandemic to offer alternative forms of accommodation to help move single people with complex needs into independent living, MH moved to a Managed Accommodation site in 2023. MH has thrived in this setting-sustaining the tenancy since this time. He now abstains from alcohol, engages well with the team, and has reconnected with his family.

### **Case study F**

LA is a young person who first became known to services at 15. LA was placed in Residential before referred to our Young Person's Gateway at an age-appropriate time. LA presented with a history of very complex needs, including a lack of emotional regulation which resulted in numerous outbursts of verbal and physical aggression. LA was well known to criminal justice and was later evicted from our Young Person's Gateway for a very serious incident. LA faced numerous short-term stays in various accommodation options which continued to breakdown.

As part of our efforts to ensure that everyone becomes ready for independent living with the right support, LA was moved into a Housing First tenancy with extensive support. LA has excelled in their Housing First tenancy - they have enrolled in college, engage well with staff and this is now their longest home placement since the age of 15.

**Suggested amendments to the Homelessness & Social Housing Allocation (Wales) Bill**

Proposed Change from the Bill	Suggested Amendment	Real Life Implication	How this provision may cause additional pressures/ why we are highlighting concerns
<p><b>Removal of the 'unreasonable failure to cooperate provision' as contained in the Housing (Wales) Act 2014 S.79 (5)</b></p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Pack Page 82</p>	<p>Retain the 'unreasonable failure to cooperate' provision as contained in the Housing (Wales) Act 2014 S.79 (5)</p>	<p>Unreasonable Failure to Cooperate decisions are used very infrequently in ordinary practice, with just 7 decisions made in the 2024 calendar year for applicants under a Prevention Duty in Cardiff. As such, the removal of this test will have a very small <i>actual</i> impact in terms of removing the negative case outcomes associated with decisions made regarding an unreasonable failure to cooperate.</p> <p>Whilst this may be the case, the removal of this legislation as a lever to encourage compliance to avert homelessness will have a much greater impact as whilst it is infrequently used in practice, the ability to call upon this tool to encourage compliance is invaluable.</p>	<p>The removal of this tool removes emphasis from individuals to take ownership of their own housing situation and may act in contrary to the Bill's overall aims to make homelessness rarer. By disincentivising personal ownership, applicants may avoid taking actions that are considered reasonable and proportionate in order to resolve their housing situation.</p> <p>The removal of this test in conjunction with the proposed changes to Personal Support and Accommodation Plans is particularly important as these will be completed at more regular intervals. Without Local Authorities being able to utilise this lever to encourage engagement, applicants may not follow agreed actions which risks undermining the utility of PSAPs.</p>

		<p>In one example where Cardiff did apply this test, the Homeless Applicant was requested 19 times to provide financial information and engage with Money Advice services to resolve affordability concerns</p>	
<p><b>Remove the intentionality test as defined under S.77 and S.78 of the Housing (Wales) Act 2014 and retain the application of this test under S.75</b></p> <p>Pack Page 83</p>	<p>Retain the intentionality test</p>	<p>Removal of this test will ensure that there are far fewer consequences for deliberately acting or failing to act in a way which results in the loss of accommodation.</p> <p>As with Unreasonable Failure to Cooperate, the actual number of cases where this test has been applied is minimal – with next to no intentionality decisions having been made since the onset of the pandemic. This is however an important tool for modifying behaviour in circumstances where households might attempt to gain access into social housing by jeopardising their prior accommodation i.e., PRS.</p>	<p>Cardiff’s homeless service already sees applications whereby households deliberately act in ways in which to end their accommodation in the hope that they can gain social housing. In some circumstances this has included conspiring with landlords to give notice, or even simply giving landlords the keys to their PRS accommodation and presenting to the Authority for housing assistance.</p> <p>The removal of this test removes the most effective deterrence tool the service can utilise and may incentivise further households to act in ways through which they hope to eventually secure social housing. The consequence of the decision to remove this test may result in outcomes at odds with the goals of Rapid Rehousing – with more households presenting and putting strain on the service which</p>

			results in longer stays in temporary accommodation
<p><b>Introduce the Deliberate Manipulation test under S.167 of the Housing Act 1996</b></p> <p>Pack Page 84</p>	Remove the Deliberate Manipulation test (S.167) and retain the original Intentionality Test	<p>By removing the intentionality test and introducing the manipulation test, the real-world impact is that local authorities will still have a duty to accommodate households but will have limited options to then move them on in future.</p> <p>This is particularly an issue whereby a household has deliberately lost their PRS accommodation through actions such as rent arrears or property damage.</p>	<p>This test could result in a household deliberately losing their PRS accommodation through arrears or property damage who would then be placed into accommodation, deprioritised for social housing, and unable to re-access the private rented sector due to being having poor landlord references or credit history.</p> <p>The consequence of this test will result in certain households staying in temporary accommodation for longer- at odds with the goals of Rapid Rehousing.</p>
<p><b>Introduction of Prevention, Support, and Accommodation Plans (PSAPs) under S.63 (B) which sets out the circumstances in which Local Authorities must review (at least every 8 weeks)</b></p>	The current proposal suggests that PSAPs are required to be completed for all applicants owed a homeless duty following the S.62 assessment. Whilst we would agree that the introduction of this under a Prevention Duty (S.66) would be beneficial, the introduction of PSAPs to be reviewed every 8 weeks under <i>all</i> Homelessness	<p>Once in temporary accommodation, many households become ready for move on, but the finite supply of housing in the community is the only reason for prolonged stay in Temporary Accommodation.</p> <p>Completion of these PSAPs may be considered frustrating for individuals who see themselves as</p>	Cardiff has more than 2000 households across Temporary and Supported Accommodation. By implementing this test (and assuming that all households could now be owed a duty due to the removal of S.73 discharge into Supported Accommodation), this could result in 14,000 reviews being required every year. Many of these reviews could be considered unnecessary by the fact

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Pack Page 35</p>	<p>Duties would be exceptionally time consuming for Local Authorities.</p> <p>Local Authorities should be able to determine the level of applicant need and adjust the timeliness of the review accordingly.</p>	<p>ready for move on and are limited by a lack of housing stock, and time consuming for authorities who could utilise this time helping to get other households ready to live independently.</p> <p>Households with support needs would already be supported through alternative frameworks such as through monthly reviews with their allocated support worker.</p>	<p>of those households already being ready to live independently.</p> <p>The completion of these plans for those in temporary accommodation on such a strict basis when they do not have further steps to take towards independence will only divert resources from where they could be making a far greater impact.</p> <p>The consequence of PSAPs being introduced in the way proposed is a substantial uplift in resource and cost for authorities which will not in many circumstances result in improved outcomes for individuals or households</p>
<p><b>Removal of the S.73 Relief Duty</b></p>	<p>Retain the S.73 Relief Duty or ensure that the ways in which the main homelessness Duty (S.75) can be discharged reflect the existing types under S.73.</p>	<p>As an Authority, Cardiff operates around 1000 units of Supported Accommodation. Hundreds of single people are placed into our Supported Accommodation every year, with their homeless duty under S.73 being subsequently discharged under S.74 (4) by virtue of an offer of Supported Accommodation.</p> <p>This does not mean that we then deprioritise these individuals for rehousing, but we have instead</p>	<p>Supported accommodation is, for many individuals, an appropriate and effective housing option.</p> <p>The existing pathway that Cardiff operates is effective in ensuring that homelessness is 'unrepeated' as it ensures that individuals that go into the Gateway are given adequate support to become ready to live independently before and after being offered permanent accommodation.</p>

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Pack Page 8</p>		<p>developed a pathway out of Supported Accommodation which ensures that individuals become live on the waiting list when ready for move on, and do so with adequate support in place.</p> <p>The removal of the S.73 duty would mean that without expanding the S.75 discharge duty to cover offers of Supported Accommodation, Single People would remain under a S.75 Duty whilst in Supported Accommodation.</p>	<p>Removal of this step could result in individuals in Supported Accommodation being provided with offers of accommodation sooner than they are ready, resulting in tenancy failure.</p>
<p><b>Introduction of the 'Viewing of Accommodation' Duty under S.96 (C).</b></p>	<p>Removal of the Duty and/or incorporate into Code of Guidance instead.</p>	<p>Cardiff already operates internal policies to ensure that viewings (in person or virtual) are provided to individuals but by legislating this, the Bill provides a potential barrier to providing someone with a move on option.</p>	<p>Last year more than 1600 social housing lets were made. At the same time, more than 2000 households were accessing temporary and supported accommodation.</p> <p>In line with the goals under Rapid Rehousing, we want to ensure that homelessness is as brief as possible and strive to reduce the time available between any property becoming vacant and next being occupied. Whilst this does not mean that corners should be cut in offering unsuitable accommodation to individuals, existing safeguards are already in place to</p>

			<p>ensure that any offer of accommodation is suitable (suitability assessments at the time of offer and independent review procedures).</p> <p>Adding this step as a legislative requirement may be contrary to the goals of Rapid Rehousing as it will slow the rate of move on – particularly where viewings result in unreasonable refusals of offers of accommodation.</p>
<p><b>Introduction of the amendment for S.80/ S.189 referrals under a S.86 Prevention Duty.</b></p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Pack Page 87</p>	<p>Clarification required/ possible amendment to make legislation compatible with the Housing Act.</p>	<p>Currently legislation under S.189 applies to individuals who are owed a duty under S.189 (B) – Homeless and Eligible for Assistance.</p> <p>As a city with a prison population, this could result in Cardiff taking applications through Act and Ask to support people in custody in sustaining a tenancy in the community. This is a positive step, but without legislation fully supporting this, it is possible that any referrals under S.80 would be declined by an authority in England as they do not meet the criteria under their respective legislation.</p>	<p>HMP Cardiff has a population of approximately 758, with 31% considered to have no fixed abode. The number of individuals that could present to Cardiff as the hosting authority has the potential therefore to have significant impact – particularly when considered in combination with Ask and Act.</p> <p>This impact will be felt further if legislation allows for conflict between authorities or results in cross-border referrals being refused – therefore resulting in Cardiff case-holding for individuals under a Prevention Duty.</p>

<p><b>Introduction of a reasonable preference category proposed for care leavers under the Housing Act 1996 (S.167 (2))</b></p>	<p>Ensure that any reasonable preference for the allocation of social housing is dependent on local connection.</p>	<p>Without clearly linking the reasonable preference for care leavers and veterans to a local connection, there is a risk that individuals from outside Cardiff could be allocated social housing, potentially straining limited resources in a city that already attracts high demand.</p>	<p>Any care leaver could apply to Cardiff's social housing waiting list and be allocated social housing.</p> <p>This would put a disproportionate level of burden on Authorities that have pull factors such as employment opportunities.</p>
---	---	---	---

# Housing Services

## Housing Reform in Action: Carmarthenshire's Perspective on the Homelessness and Social Housing (Wales) Bill



---

# Contents

<b>Contents</b>	<b>2</b>
<b>Introduction</b>	<b>3</b>
<b>Strategic Shifts</b>	<b>4</b>
Earlier Intervention	4
Abolition of the Priority Need Test	4
Abolition of the Intentionality Test	5
<b>Operational Duties</b>	<b>7</b>
Mandatory Prevention, Support and Accommodation Plans (PSAPs)	7
Expanded Review Rights	8
New Discharge and Follow-Up Duties	9
Local Connection	11
Rights and Provisions for Prison Leavers	13
Accommodation and Allocation	15
<b>Multi-Agency Collaboration</b>	<b>17</b>
“Ask and Act” Duty	17
Joint Protocols	18
Statutory Case Co-ordination	18
<b>Implementation</b>	<b>20</b>
<b>Conclusion and Recommendations</b>	<b>24</b>

---

# Introduction

In May 2025 Welsh Government introduced the *Homelessness and Social Housing Allocation (Wales) Bill*, accompanied by a comprehensive Impact Assessment. This legislative development marks a significant milestone in the ongoing reform of Housing Policy in Wales, aiming to strengthen the legal framework surrounding homelessness prevention and the allocation of social housing. The Bill reflects a growing recognition of the need for a more person-centred, preventative and equitable approach to housing support, particularly in the context of increasing demand and complex housing needs across the Country.

This report provides a summary of the key legislative changes introduced by the Bill, with a particular focus on their implications for Housing Options services across Wales. It also explores the specific service delivery in Carmarthenshire, highlighting both the opportunities and challenges that lie ahead for local implementation. The aim is to support informed planning, ensure compliance with the new statutory duties and promote best practice in meeting the housing needs of our communities.

---

# Strategic Shifts

## 1. Earlier Intervention

- The definition of “threatened with homelessness” has been expanded from 56 days to 6 months, enabling earlier interventions to be implemented.
- This change enables residents to access support before reaching crisis point, improving prevention outcomes.
- This means that individuals served with a notice to vacate – even if the notice is not legally valid – must now be treated as threatened with homelessness.

### Impact and implications

As outlined in the impact assessment this will increase caseloads for all local authorities and will require more proactive casework and earlier engagement with applicants.

In Carmarthenshire we are already focussing on the front end of the service and have introduced to an earlier prevention model. The shift to taking applications from the point a notice is served – where there is a threat of homelessness - is already embedded into the service.

This change in approach, particularly in relation to notices, removes discretion from local authorities whether to take a homelessness application in such cases. Previously, advice alone may have resolved the issue. This new approach introduces a statutory administrative burden.

## 2. Abolition of the Priority Need Test

Under current legislation, only certain groups (e.g. families with children, vulnerable individuals) are considered to have a “priority need” and are therefore entitled to the main homelessness duty.

The new approach abolishes the priority need test, meaning all eligible applicants will now be owed a full duty, regardless of whether they fall into a previously defined priority category.

### **Impact and implications**

In Carmarthenshire, we have continued with this inclusive approach since the pandemic and the “no one left out” policy, choosing not to revert to applying the priority need test. However, this has presented challenges. We are seeing an increase in clients seeking assistance who would not have approached in the past. Many of these individuals are not vulnerable and have the resources to resolve their circumstances independently.

Word has spread that local authorities must assist regardless of individual circumstances. As a result, the system is becoming less effective for those who are most in need – **“if everyone is a priority, no one is priority”**.

### **3. Abolition of the Intentionality Test**

Under Current Homeless legislation, individuals may be found to have made themselves intentionally homeless in certain circumstances. While such decisions are rare, the test has been used by local authorities to manage behaviour and as a persuasive tool to encourage engagement and discourage manipulation of the system.

The new Bill replaces this with a “Deliberate manipulation” test, which specifically targets applicants who intentionally make themselves homeless to access social housing. These individuals may be deprioritised for housing but not excluded from homelessness support.

Additionally, the new Bill further removes the ability to end the Section 75 duty if an applicant becomes intentionally homeless from temporary accommodation.

## **Impact and implications**

While the “deliberate manipulation” test is a welcome tool, it only applies at the social housing registration stage. This creates a challenge for local authorities: for example, an individual who becomes homeless intentionally from the private sector maybe ineligible for social housing yet must be provided with interim accommodation. However, this accommodation cannot be ended unless permanent housing is secured. In such cases, the only viable option may be to source private sector accommodation. But due to the individual’s previous behaviour, this route can become difficult to access – leaving people in interim accommodation for extended periods.

The Bill does introduce new, specific grounds under which the Section 75 duty can be ended, including:

- Violent or threatening behaviour towards staff or service providers.
- Serious damage or destruction of property provided under homelessness duties.
- Persistent non-engagement, where the applicant fails to respond to repeated contact attempts despite a warning notice.

While these are welcome additions, the bill does not address situations where individuals abandon or cease to occupy the accommodation provided, such as leaving without notice or not using the accommodation at all.

---

# Operational Duties

## 4. Mandatory Prevention, Support and Accommodation Plans (PSAPs)

Prevention, Support and Accommodation Plans (PSAPs) will replace Personal Housing Plans under the new Homelessness and Social Housing (Wales) Bill.

- PSAPs are mandatory for all applicants to whom a local authority considers it owes a homelessness duty.
- They replace Personal Housing Plans, which were previously recommended but not legally required.
- Must be person-centred, trauma-informed and **reviewed every 8 weeks** or when circumstances change.
- Each plan must include housing needs, support needs, communication preferences and agreed actions.

### Impact and implications

As this becomes a regulatory requirement, all individuals undergoing a S.62 assessment must receive a PSAP, with reviews every 8 weeks or when circumstances change.

Each PSAP is estimated to take 4 hours to complete and maintain. Although the impact acknowledges the need for additional staffing, it does not fully explore the operation implications for local authorities.

With an expected increase in homeless presentations under the new Bill, more individuals will require PSAPs.

We have analysed current casework to estimate the scale of this requirement:

- **Cases where the Section 75 duty ended from 01/04/2025:** 147
- **Top end:** 20 PSAP reviews per case times (typically single-person households with longer case durations) = 80 hours per case
- **Bottom end:** 1 review = 4 hours
- **Average:** 7 reviews per case = 28 hours

This highlights the operational burden, particularly for complex or long-term cases such as single-person households where accommodation is harder to source.

Given the scale of the resource requirement, we suggest considering the model used in England, where PSAPs are mandatory but reviews are required only when circumstances change or at the discretion of the local authority.

## 5. Expanded Review Rights

The new Homeless and Social Housing Allocation (Wales) Bill introduces significantly expanded rights for applicants to request reviews of key decision made by local housing authorities.

Applicants can request reviews of:

- **Decisions not to assess under Section 62**
- **Assessments of:**
  - Housing needs.
  - Support needs to retain accommodation or live independently.
- **PSAP content can be reviewed at any time while the plan is maintained.**
- **Suitability of accommodation:**
  - Before accepting the offer.
  - After accepting, while a duty under Section 66, 68 or 75 applies.
  - Within 6 months of the accommodation being made available.

## Impact and implications

The national impact assessment anticipates a 25% increase in review requests across Wales, estimating that each review will take approximately 3.5 hours to complete.

However, operational experience suggests this is a significant underestimation. When factoring in time to prepare files, contact individuals for further information, arrange and conduct interview, and complete the review process, the actual time required is closer to 8 hours per review – and up to 10 hours for more complex cases.

With PSAPs now subject to mandatory review every eight weeks, individuals could potentially request a review at each interval. Based on our average time estimate, this could result in **56 hours** spent on PSAP related reviews for a single case over a six-month period.

The provision allowing individuals to request a review up to six months after moving into a property is also problematic. While the rationale is to give individuals a realistic opportunity to assess the suitability of their accommodation over time, we believe these considerations can and should be addressed during the initial offer process through open and transparent communication.

Furthermore, under Section 75, even when a reasonable offer is made and accepted the duty cannot be ended unless the applicant agrees in writing. If this agreement is not provided, the case remains open, requiring ongoing monitoring, support and administrative input.

### Why is this requirement challenging for Local Authorities?

- **Limits of Case Closure** – cases remain open longer, even after offers are accepted.
- **Resource Strain** – Increased demand on staff time and capacity
- **Risk of System Congestion** – higher volume of open cases may lead to delays and inefficiencies
- **Administrative Complexity** – more frequent reviews and extended rights increase procedural burdens.
- **Limited Recourse Without Agreement** – authorities are unable to close cases without written consent, even when duties are fulfilled.

## 6. New Discharge and Follow-Up Duties

### 6.1 Discharge of Duty:

Local authorities will now be able to discharge the Section 75 duty using a broader range of accommodation options, including:

- Supported Lodgings
- Family reunification
- Returns to previous accommodation

This flexibility is intended to:

- Improve flow through the homelessness system.
- Offer more tailored solutions, particularly for younger or single applicants.
- Reduce reliance on traditional social housing or private sector offers.

## **6.2 New Follow-Up Duty**

### **Who it applies to**

The follow-up duty applies to applicants whose Section 75 has ended, provided that:

- They are no longer homeless
- They have suitable accommodation expected to last at least 12 months
- They have agreed in writing to the duty ending
- They are not already being assessed or supported under another duty

### **When and How**

Local authorities must contact the applicant between 5 and 7 months after the Section 75 duty ends.

The purpose is to assess whether the applicant:

- Is homeless
- Is threatened with homelessness
- Is at risk of either

### **What Authorities Must Do**

- Take reasonable steps to contact the applicant, regardless of where they are living
- If a risk is identified, provide appropriate advice and information

This duty acts as a preventative safeguard, particularly for individuals in non-traditional housing arrangements such as shared or informal accommodation.

The follow-up duty does not apply if the Section 75 duty ended through a formal offer of social housing or private rented accommodation.

## **Impact and implications**

The impact assessment estimates that each follow-up will take up to 30 minutes. However, in practice, the process of establishing contact including multiple phone calls, letters, emails, text messages, and checks with known support services – is likely to take significantly longer. This places an additional burden on local authorities.

## **7. Local Connection and Local Connection to Wales**

### **7.1 What Counts as a Local Connection?**

The Bill retains and refines the concept of local connection as a condition for accessing the main housing duty, this means:

- A person must have a local connection to a Welsh local authority area to be eligible for the full duty to secure accommodation.
- The Bill introduces Section 12 to define the meaning of local connection, and Section 6 to specify that the duty to secure accommodation applies only to those with such a connection.

Although the Bill itself does not redefine the criteria, it gives Welsh Ministers the power to make regulations that clarify when a person is or is not considered:

- Normally resident in an area.
- Employed in an area.
- Having a family association with an area.
- Having special circumstances connecting them to an area.

This provides flexibility and allows future clarity through secondary legislation.

### **7.2 The Local Connection to Wales Test**

- If an applicant has a local connection to any Welsh local authority, they meet the threshold test for the Section 75 duty (the duty to secure accommodation including temporary accommodation).
- For example, if someone applies in Carmarthenshire but has a local connection to, say, Swansea, they are still eligible for the Section 75 duty – as long as they have a connection to somewhere in Wales.

- Once the Section 75 duty is triggered, the referral mechanism applies:
  - If the applicant does not have a local connection to the authority they applied to but does have a connection to another Welsh authority then the authority may refer the case to that area (known as the Section 80 referral).

Situation	Section 75 Duty Applies?	Referral Possible?
Applicant has a local connection to another Welsh authority	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> Yes, unless exempt
Applicant has no local connection to any Welsh authority	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Not eligible for Section 75 <input checked="" type="checkbox"/> Yes, unless exempt
Applicant has a local connection to the applying authority	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No referral needed

### Impact and implications

The new local connection to Wales test is designed to help authorities focus resources on individuals with a genuine connection to Wales. It also strengthens provisions to ensure that interim accommodation is provided while local connection is being investigated.

In Carmarthenshire, analysis shows that cases often present from across Wales, as well as from England and Scotland. Many of these are accepted due to fleeing domestic abuse or serious harassment, which are exempt from local connection requirements.

Cases where no local connection exists are rare. However, attempts to refer individuals to areas where they do have a connection have sometimes failed due to non-cooperation, with individuals choosing to remain in the county.

## **8. Rights and Provisions for Prison Leavers**

The Homelessness and Social Housing Allocation (Wales) Bill significantly strengthens the rights and entitlements of prison leavers, with a focus on early intervention, continuity of support and fair access to accommodation.

### **8.1 Clarified Eligibility for Homelessness Support**

Prison leavers are not automatically considered homeless unless one of the following applies:

- They are already under an existing homelessness duty.
- Their existing accommodation is at risk (e.g. due to loss during custody).
- They are within six months of release.

This ensures that support is targeted and timely, especially for those at risk of homelessness upon release.

### **8.2 Early Assessment of Need**

At the reception stage (point of sentencing), local authorities are encouraged to assess:

- Risk of losing accommodation.
- Risk of losing personal possessions.
- Likelihood of being homeless within six months of release.

Although not a standalone legal duty, this is expected to be captured under the new “Ask and Act” duty for public authorities.

### **8.3 Viewing Accommodation**

Local authorities must take reasonable steps to allow applicants to view accommodation before accepting it.

For prison leavers, this may include:

- Proxy viewings.
- Photographs or videos of the property.

This ensures informed decision-making and reduces the risk of unsuitable placements.

### **8.4 Continuation of Duties During Custody**

- If a person enters custody while under a homelessness duty, that duty does not automatically end.

- However, if the person is likely to remain in custody for more than six months and no accommodation can be preserved, the duty may be discharged.

## 8.5 Protection of Property

Local authorities have a legal duty to take reasonable steps to prevent the loss or damage of personal property belonging to applicants who are:

- Are owed homelessness duties
- Are unable to protect or manage their property due to detention or incapacity.

## 8.6 Tenancy and Accommodation

The Bill does not require social housing tenancies to be held open during a prison sentence. Instead, it provides a framework for assessing whether the tenancy can or should be preserved, based on:

- The length of the sentence.
- The risk of homelessness upon release.
- The ability of the local authority to intervene under prevention duties. This can be supported by rent payments or arranging for someone to manage the property temporarily.

### Impact and implications

While the Regulatory Impact Assessment suggests the financial impact on local authorities will be small, several practical and financial challenges are anticipated:

- **Storage costs:** protecting personal belongings can be expensive, especially where long-term storage is needed.
- **Pets:** the Bill is silent on responsibilities for pet care during custody, which may create gaps in support for individuals with animals.
- **Access to Prisoners:** conducting assessments and arranging viewings while individuals are in custody remains a significant operational challenge. Current limitations on communication and scheduling within prisons may hinder timely interventions.
- **Capacity Pressures:** Effective implementation will require increased capacity within prisons to facilitate communication between officers and prisoners, often on short notice.

## **9. Accommodation and Allocation**

### **9.1 Improved Temporary and Long-Term Accommodation**

The Improved Temporary and Long-Term Accommodation provisions in the Homelessness and Social Housing (Wales) Bill aim to reduce time spent in temporary accommodation and increase sustainable move-on options.

Under point 6 above it gives broader discharge options under the main homelessness duty.

### **9.2 Suitability and Security**

To ensure stability:

- Accommodation must be suitable for the applicant and their household.
- It must be likely to be available for at least 12 months before the duty can be discharged.

This aligns with the goal of providing the same security of tenure as other housing options.

### **9.3 Temporary Accommodation**

Provide interim accommodation even if local connection is unclear or not yet established.

### **9.4 Suitability Standards**

The Homelessness (Suitability of Accommodation) (Wales) Order 2015 remains the foundation, but the Bill enables Welsh Ministers to:

- Amend the Order to improve standards
- Set the minimum suitability criteria, including:
  - Health and Support Needs
  - Location and accessibility
  - Physical condition and safety
  - Affordability
  - Landlord/provider suitability
  - Conditions of occupation
- The Bill explicitly states that unsupported temporary accommodation, such as B&Bs, is not suitable for applicants aged 16 or 17.
- This applies to both interim accommodation and accommodation used to discharge duties under the homeless legislation.

### **Impact and implications**

While local authorities agree that B&Bs are not suitable for 16 and 17 year olds this will require an increase in supply of suitable accommodation for this age group and stronger protocols for joint assessments with social services and youth justice to be able to secure appropriate placements.

## **10. Common and Accessible Housing Registers**

The new Homeless and Social Housing Allocation (Wales) Bill introduces a statutory requirement for all local authorities in Wales to establish and maintain both a Common Housing Register (CHR) and Accessible Housing Register (AHR). These reforms are designed to improve consistency, transparency and efficiency in the allocation of social housing.

### **Impact and implications**

There would be no impact on Carmarthenshire as it already has an already well established CHR and AHR which includes a Common Allocations Policy.

## **11. Allocation Reforms**

Local housing authorities are empowered to define who qualifies for social housing in the area. This enables:

- Greater local flexibility in managing housing registers.
- The ability to exclude applicants who do not meet locally determined criteria (e.g. residency, behaviour or housing history).
- A requirement to give reasonable preference to care leavers owed duties under Section 180A.
- A new “deliberate manipulation” test, allowing the removal of preference for applicants who intentionally make themselves homeless to gain priority.

### Impact and implications

This would require minor amendments to the Social Housing Allocation Policy. Carmarthenshire has recently implemented a new Allocations Policy, transitioning from choice-based lettings to direct matching. This change has enabled the local authority to discharge its duties more efficiently by prioritising applicants who are homeless or at risk of homelessness.

---

## Multi-Agency Collaboration

### 12. “Ask and Act” Duty

The new statutory duty requires specified public authorities in Wales- such as health boards, social services and prisons to:

- **Identify individuals** who are homeless or may be homeless or at risk of homelessness.
- **Seek the persons consent** to refer them to a local housing authority.
- **Make a referral** to the local housing authority (if consent is given), which will be treated as a formal homelessness application.
- **Provide information** about other services that may help the person.
- **Consider additional steps** they could take to help the person secure or retain suitable accommodation.
- **Reflect on how the persons housing situation affects their own service delivery.**

The aim is to identify risk earlier and enable timely intervention by housing authorities. This duty reinforces shared responsibility for preventing homelessness, strengthens the multi-agency response and improves the likelihood of successful prevention.

### **Impact and implications**

Until guidance is issued, there is uncertainty around what constitutes a “reasonable request” and how local authorities can monitor non-compliance. In practice, challenges already exist - referrals are often made, but when support is requested from referring agencies to assist individuals, it is not always forthcoming. This may limit the effectiveness of the duty unless clearer expectations and accountability mechanisms are established.

## **13. Joint Protocols**

Local authorities are required to establish joint protocols between housing and social services for the following groups:

- Care Leavers.
- 16-17 year olds.
- Individuals leaving custody or youth detention.

These protocols are intended to ensure a coordinated, multi-agency response that supports vulnerable individuals in accessing and maintaining suitable accommodation, while also meeting their wider support needs.

### **Impact and implications**

While it may take time for these protocols to be fully established the introduction of joint protocols reinforces the importance of collaborative working between housing and social services.

Protocols must include:

- A mutually agreed vision and objectives
- Clear systems and processes
- Defined lead agency roles

## **14. Statutory Case Coordination**

The new Homeless and Social Housing Allocation (Wales) Bill introduces a new statutory requirement for case coordination protocols aimed at supporting individuals with multiple and

complex needs – such as those experiencing homelessness alongside mental health issues, substance misuse or having served in the armed forces.

What Local Authorities Must Do:

- Establish a written protocol for handling these cases
- Ensure multi-agency coordination between housing, social services, health, criminal justice and other relevant partners.
- Promote effective case management and joint working to:
  - Prevent homelessness
  - Secure suitable accommodation
  - Provide wraparound support

### **Impact and implications**

Carmarthenshire has recently appointed a Multi-agency Support Co-ordinator funded through Housing Support Grant monies. This will:

- Facilitate collaborative relationships with internal departments and external agencies
- Ensure a coordinated response to complex cases
- Support the coordination, delivery and actions of regular multi-agency panel meetings
- Improve outcomes for people with complex and/or multiple needs

---

# Implementation

## 15. Phased Implementation

### Phase 1: Bill Introduction and Planning (2025)

Milestone	Details
 May 2025	Bill introduced to Senedd Cymru
 Purpose	Reform homelessness and social housing allocation law
 Structure	3 Parts: Homelessness, Social Housing Allocation, General Provisions
 RIA Published	Cost-benefit analysis and implementation roadmap

### Phase 2: Early Implementation (2026–2027)

Focus	Key Actions
 Foundation Building	Begin implementation of reforms that reduce pressure on the system

Focus	Key Actions
 Training & Guidance	Develop and deliver training for local authorities and public bodies
 Legislative Commencement	Sections 39, 41–43 come into force immediately after Royal Assent
 Monitoring Prep	Begin aligning internal monitoring frameworks with new duties (e.g. PSAPs, Ask & Act)

## Phase 3: Core Legislative Rollout (2027–2028)

Focus	Key Actions
 Prevention Duties	Expanded definition of “threatened with homelessness” (6 months)
 PSAPs	Prevention, Support and Accommodation Plans become statutory
 Ask & Act Duty	Specified public authorities must identify and refer at-risk individuals
 Review Rights	Applicants gain new rights to review assessments and plans

Focus	Key Actions
 Local Connection	New referral rules and exemptions begin phased rollout

## Phase 4: Systemic Reform (2030–2031)

Focus	Key Actions
 Abolish Priority Need	All eligible homeless individuals entitled to support
 Abolish Intentionality	Removes “deserving vs undeserving” distinction
 Suitability Standards	Strengthened accommodation standards (via amended Suitability Order)
 Statutory Review	First report on interim accommodation due by 31 Dec 2030
 Ministerial Orders	Welsh Ministers to commence remaining provisions by statutory instrument.

## Impact and implications

Carmarthenshire is currently reviewing its service areas in anticipation of the Homelessness and Social Housing (Wales) Bill. While the reforms offer a more inclusive and preventative approach, they also present significant challenges:

- **Funding uncertainty:** There is currently no clear indication of how local authorities will be resourced to deliver the expanded duties.
- **Workforce development:** authorities will need to invest in training, recruitment and upskilling to meet new statutory requirements.
- **Systems infrastructure:** IT systems and case management tools will require upgrades to support new monitoring and reporting duties.
- **Administrative Burden:** The introduction of PSAPs, expanded review rights and new referral mechanisms will increase the administrative workload, requiring careful resource planning.

---

# Conclusion and Recommendations

The Homelessness and Social Housing (Wales) Bill represents a transformative shift in housing legislation, placing prevention, equity and person-centred support at the heart of service delivery. From Carmarthenshire’s perspective, the Bill aligns with many of the progressive practices already embedded locally – such as early intervention, inclusive service access and multi-agency collaboration. However, it also introduces significant operational and resource challenges.

The removal of the priority need and intentionality tests, the introduction of mandatory Prevention, Support and Accommodation Plans (PSAPs), and expanded review rights will increase demand on frontline services, case management systems, and staffing capacity. While the Bill offers welcome flexibility in discharging duties and strengthens protections for vulnerable groups, including prison leavers and young people, its success will depend heavily on adequate funding, clear guidance and robust infrastructure.

Carmarthenshire is well-positioned to lead in implementing these reforms, having already adopted the Bills principles. However, to fully realise the Bill’s ambitions, sustained investment, workforce development, and cross-sector accountability will be essential. As we move into the implementation phases, Carmarthenshire remains committed to delivering a responsive, fair and effective housing service that meets the evolving needs of its communities.

## Recommendations

1. **Secure Funding** – Advocate for dedicated resources to meet the Bill’s expanded duties
2. **Build Workforce Capacity** – Recruit, train and upskill staff to deliver new statutory functions.
3. **Upgrade Systems** – Invest in digital tools to manage PSAPs, reviews and case coordination efficiently.
4. **Update Local Policies** – Align Allocation Policy and joint protocols with the new legal framework.
5. **Enhance Prevention** – Strengthen early intervention pathways, especially for high-risk groups.
6. **Monitor Implementation** – Establish local systems to track progress and outcomes.
7. **Promote Multi-Agency Accountability** – Clarify roles under the “Ask and Act” duty and ensure shared responsibility.
8. **Expand Suitable Housing Options** – Increase access to appropriate accommodation, especially for young people and complex cases.

## Agenda Item 7.4

Dear Members of the Local Government and Housing Committee,

Please see our latest Public Health Wales report titled [\*“Shaping the future of healthy housing for children and families in Wales: A summary of stakeholder engagement.”\*](#)

Our findings may support the Committee’s ongoing work on housing and public health, and we would welcome the opportunity for our work to inform future policy considerations or evidence sessions.

Should you require any further detail or wish to discuss the report in more depth, we would be happy to engage further.

Thank you for your time and consideration.

Warm regards,

Joe



GIG  
CYMRU  
NHS  
WALES

Iechyd Cyhoeddus  
Cymru  
Public Health  
Wales



World Health Organization  
Collaborating Centre on Investment  
for Health and Well-being

# Shaping the future of healthy housing for children and families in Wales: A summary of stakeholder engagement

August 2025



# Table of contents

<b>Contents</b>	<b>2</b>
1. Purpose of the report	3
2. A vision for healthy homes in Wales	3
3. Current challenges to healthy housing in Wales	4
4. Moving towards healthier homes	6
4.1. Where are we now? (Horizon 1)	8
4.2. What should the future look like? (Horizon 3)	9
4.3. What can we do differently? (Horizon 2)	10
4.4. Seeds of change	11
5. Emerging areas for action	14
5.1. Next steps	14
References	15

## Acknowledgements

We would like to thank all those who attended the November 27th, 2024, workshop on the Future of Healthy Homes in Wales, at Sophia Gardens, Cardiff, especially guest speakers including Pep Malcheva and Natalie Blakeborough (Public Health Wales), Dr Gareth Morgan (Hywel Dda University Health Board) and James Hooker (Welsh Government). With thanks also to Tai Pawb for the permission to use [Samson's Story](#).

Thank you to colleagues in Public Health Wales for providing feedback and contributing to the development of the report: Ishika Patel, Leah Wargent, Rebecca Hill, Hayley Janssen, Catherine Sharp, Cheryl Williams, Louisa Petchey, Jo Peden and Sumina Azam. We would also like to thank Julie Sloan, Carys Dale and David Symons for proofreading.

ISBN: 978-1-83766-617-1

©2025 Public Health Wales NHS Trust. Material contained in this document may be reproduced under the terms of the Open Government Licence (OGL) provided it is done so accurately and is not used in a misleading context. Acknowledgement to Public Health Wales NHS Trust to be stated. Copyright in the typographical arrangement, design and layout belongs to Public Health Wales NHS Trust.

Mae'r adroddiad hwn ar gael yn Gymraeg / This report is available in Welsh

Pack Page 115

# 1 Purpose of the report

Our homes can significantly shape our physical and mental health and well-being.

This paper sets out the work that Public Health Wales has conducted alongside other housing stakeholders to envision a future of healthier homes, especially for those living in poverty. It summarises insights drawn from stakeholder conversations and a futures-focused workshop, held in November 2024.

This work builds on two previous reports from Public Health Wales – an overarching report, [homes for health and well-being](#), and a second on [affordability](#). Here we go further and shine a light on housing quality, affordability, and security, and the impact this has particularly on the well-being of children and families.

By setting out our emerging understanding of these urgent challenges and opportunities, we hope this paper will provide a critical foundation for deeper exploration, and support future-focused policy and action for all those working to make healthier homes for people in Wales.

## 2 A vision for healthy homes in Wales

We know a home is more than just bricks and mortar and a roof over your head. It is a space that can keep us healthy and improve our well-being.

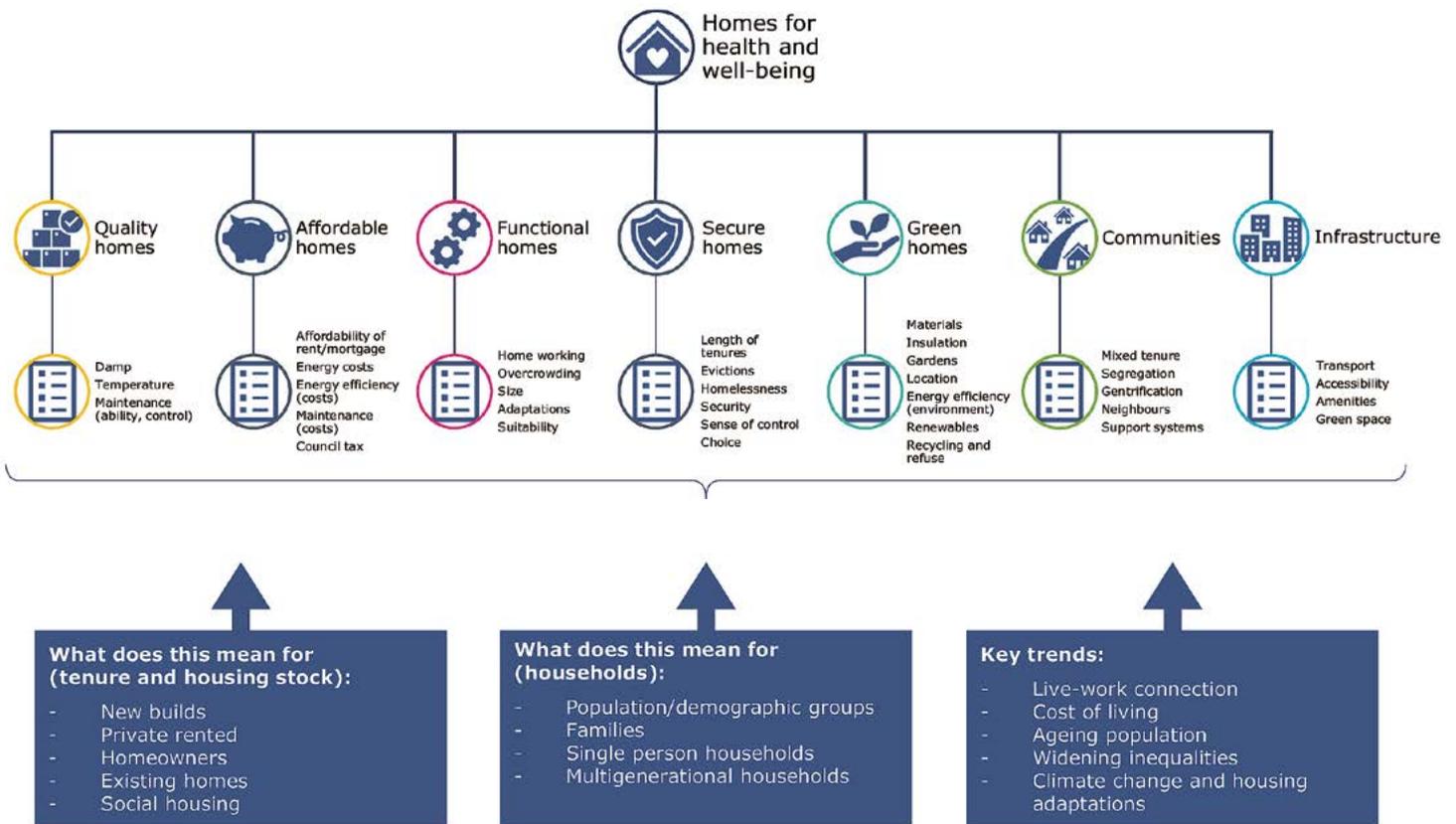
When we talk about ‘healthy homes’ we mean a home that is secure, affordable<sup>1</sup>, of good quality, and environmentally sustainable. It should be in an area where people can access employment opportunities, a range of shops and services, and space for exercise and play, particularly for children. Homes that meet these standards are more likely to feel comfortable, safe, and stable, allowing families to establish roots in their community, participate socially, and develop a sense of belonging; all of which are essential for good health and well-being<sup>2</sup> (see Figure 1).

Homes can be described as a “social determinant of health”<sup>3</sup>, where the housing conditions that children experience can influence their physical and mental health throughout life. Exposure to poor housing such as overcrowding, damp, cold, mould, and noise can lead to poor health, including cardiovascular and respiratory illnesses, a greater spread of infections, and stress, depression, and anxiety<sup>4</sup>.

This means that good housing policy is good health policy. And it begins with recognising that a healthy home is not a luxury — it is a necessity.

That is why our vision for healthy homes in Wales is that **everyone should be able to live in a home that protects and promotes their health and well-being**; and that all housing policy decisions are used to enable this vision in the short term and for future generations.

**Figure 1: Homes for Health and Well-being<sup>5</sup>**



### 3 Current challenges to healthy housing in Wales

To make progress towards achieving our shared vision for healthy housing in Wales, we need to understand what issues are currently standing in our way and what change is needed to create the future we want.

To do this, Public Health Wales has engaged extensively with stakeholders, both in one-to-one interviews and through a futures-focused workshop. In the interviews, we focused on identifying the key challenges that are preventing healthy homes in Wales today. What we heard is summarised in Figure 2.

In our conversations, stakeholders also noted current areas of action in health and housing policy and practice that provided opportunities for change, including:

- The [White Paper](#)<sup>6</sup> on securing a path towards adequate housing, fair rents and affordability.
- Hywel Dda University Health Board (UHB) [Bevan Exemplar](#), which is bringing housing and health stakeholders together in a community of practice.
- A [Housing and health research network](#) hosted by the University of South Wales.
- The [Back the Bill campaign](#) led by Tai Pawb, Shelter Cymru, and the Chartered Institute of Housing Cymru.

These pressing issues and a clear desire for change highlight that now is a pivotal time to build on evidence that makes the case for investing in healthier homes for families in Wales, and for stakeholders to work together collaboratively.

**Figure 2: Key challenges to healthy housing in Wales as identified by stakeholders**

**Fragmented policy landscape**

Whilst there is work on building low carbon social homes, there is a need to go further with policy to address affordability, accessibility and diverse housing tenures. Housing policy would also benefit from increased integration with other relevant policy areas such as those to support low income families.

**Addressing all sectors**

At present, the private rented sector significantly lags behind the social rented sector in terms of quality. There is a need to improve quality in private sector housing by prioritising data collection and implementing standards to enhance key housing indicators, such as tenure and habitability, across all housing sectors.

**Growing numbers in temporary accommodation**

The increasing number of families in temporary accommodation reflects a shortage of affordable housing, rising homelessness, financial pressures, and challenges in housing policy and funding. These factors, combined with the impact of COVID-19, highlight the urgent need for more stable, long-term housing solutions in Wales.

**Functional homes**

The housing needs of older people and those living with disabilities are not being adequately met and require more tailored solutions for older individuals with features like step-free access, wider doorways, and age-friendly bathrooms. There is also a need for housing close to healthcare, social services, and transport, as well as flexible options like extra-care or sheltered accommodation to support independent living.

**Public awareness and trust**

There is a lack of awareness and trust from the public when it comes to accessing the right support and services for housing needs.

**Framing and language**

There is a need for better framing and language when developing housing policies and initiatives to ensure clarity, understanding, and engagement of those with lived experience.

## 4 Moving towards healthier homes

One thing all stakeholders in housing agreed on is that collaboration is fundamental to addressing housing related health challenges. To facilitate this, Public Health Wales coordinated a workshop in November 2024 on the future of healthy homes (see Box 1 for the agenda).

Following feedback from stakeholders, and the growing recognition of the importance of early years in lifelong health and well-being, the workshop had a focus on children and families living in poverty. Preventative and proactive efforts in supporting children's health now can enable all children in Wales to reach their full potential and reduce the risk of costly, complex health challenges in the future.

We also elected to apply long-term thinking to the workshop, using the Three Horizons model (see Box 2 for more detail on the methodology). We did this for several reasons. First, because to advocate effectively for a future of healthy housing, stakeholders across sectors must have a shared vision of where we are heading and alignment of the different views of what 'good' could look like.

Taking a long-term approach also enables us to prevent potential harm and take advantage of opportunities to maximise health and well-being outcomes for current and future generations. For example, by considering how [future trends](#), such as climate change, an ageing population, global political shifts, and new technological developments, may affect the future of healthy housing.

Exploring how the future may unfold differently for different people is also necessary to ensure no one is left behind in policies that seek to achieve a healthier and more equal future. Building collaborative, hopeful futures gives us agency to actively work towards creating them, and avoid the risk of unhelpful outcomes in future.

To take a futures approach, we used the [Three Horizons model](#).

Nearly fifty stakeholders working in health and housing, including representatives from Welsh Government, local health boards, the third sector and academia, attended the workshop. The outcomes of the day are summarised below.

## Box 1: Long-term thinking workshop agenda

- Prior to the workshop, participants were asked to share examples of good practice via a Seeds of Change exercise, which was emailed out to each participant.
- The workshop opened with a presentation on the Welsh Government's [White Paper](#) on securing a path towards adequate housing, including fair rents and affordability, which was out for consultation at that point.
- This was followed by a World Cafe event, which included opportunities to learn about the Hywel Dda UHB [Bevan Exemplar](#)<sup>7</sup> on health and housing, ACE Hub Cymru's [Trauma Informed Wales framework](#)<sup>8</sup>, and a [lived experience video](#)<sup>9</sup> kindly shared by Tai Pawb.
- The workshop also included a [Three Horizons](#) exercise.

## Box 2: The Three Horizons methodology

The three horizons model is a structured way of thinking about future planning. It considers:

- Where we are now (horizon 1),
- Our preferred future (horizon 3),
- What steps are happening already, or will need to happen, to bring about the future we would like to see (horizon 2).

The model can be used at a high-level, to give us quick insights, and then developed iteratively to explore each horizon in more depth.

It can be a useful exercise at multiple stages of a project – to help diagnose current issues and agree why change is needed, to develop a shared vision for the future, or to start developing a transformational change plan.

## 4.1 Where are we now? (Horizon 1)

Attendees were first asked to review the current challenges to healthy housing in Wales. In addition to the issues identified by our stakeholder interviews, attendees identified three additional challenges, which are captured in Figure 3.

**Figure 3: Summary of the additional challenges to healthy housing identified by workshop participants**



Stakeholders also identified several more granular, immediate issues that the sector in Wales needs to grapple with that interact with the wider challenges:

- A large private rental sector with insufficient regulation.
- Fragmented collaboration between health and housing organisations.
- A shortage of housing supply, both in terms of volume and diversity.
- A growing gap between local housing allowances and rental costs.
- A focus on short-term solutions, such as emergency funds, rather than addressing the root causes of housing issues.

## 4.2 What should the future look like? (Horizon 3)

Before looking at tangible action to pursue in the present, attendees were asked to skip forward and identify the elements of a future of healthy homes. The eight priorities they identified are summarised in Figure 4.

**Figure 4: The future vision for housing in Wales**



Clarity on the future vision enabled the workshop to identify priority areas for action in the present. The following sections outline the key steps, opportunities, and partnerships required to begin moving toward this vision, ensuring that housing in Wales supports health, well-being, and equity for all.

## 4.3 What can we do differently? (Horizon 2)

For the final part of the exercise, stakeholders were asked to think of transformational and innovative ideas that can help us achieve the desired future vision (termed horizon 2 ‘plus’ interventions). They were also asked to identify and be wary of activity that may serve as a temporary sticking plaster, rather than an activity that helps pave the way towards the desired future (termed horizon 2 ‘minus’ interventions). Their thinking is summarised in Table 1.

**Table 1: Summary of ‘plus’ and ‘minus’ horizon 2 interventions identified by workshop participants**

Horizon 2 ‘minus’ interventions	Horizon 2 ‘plus’ interventions
<ul style="list-style-type: none"> <li>✗ Emergency streams of funding that help individuals temporarily but do not deal with root causes.</li> <li>✗ Increased use of temporary accommodation, e.g. hostels, B&amp;Bs, to house people who are homeless or in urgent need of housing.</li> <li>✗ The temporary relaxation of planning rules, which speed up the development of housing but can lead to poor-quality developments and do not always meet the needs of families.</li> </ul>	<ul style="list-style-type: none"> <li>✓ <b>Co-production of a housing strategy</b> informed by those in the public and third sector and those with lived experience.</li> <li>✓ <b>Benefit reform</b> (reserved to UK Government) such as changes to the local housing allowance, and improved welfare support for families on low incomes.</li> <li>✓ <b>Rent controls</b> and stabilisation that would curb the rising costs in the private rental market, ensuring rents stay affordable for those on lower incomes.</li> <li>✓ <b>Simplifying planning permissions</b> for affordable housing projects to reduce delays and costs associated with construction.</li> <li>✓ <b>Supporting standardised Health Impact Assessments (HIA)</b> in all local authorities in Wales to ensure developments have a positive impact on health of the local population.</li> <li>✓ <b>Investing in homelessness prevention</b> programmes that focus on addressing the root causes of homelessness, such as poverty, mental health issues, and relationship breakdowns. This could include rent subsidies, legal aid, and access to support services.</li> <li>✓ <b>Expanding a ‘housing first approach’</b>, which provides stable housing for homeless individuals first, followed by support for issues like addiction or mental health. This model has been shown to reduce homelessness and improve long-term outcomes.</li> </ul>



## 4.4 Seeds of change

Attendees were also asked to share ahead of the workshop examples of 'seeds of change'<sup>1</sup> – those existing ideas that, if nurtured, have the potential to shape the future.

They are likely not widespread nor well-known and can include social initiatives, economic tools, or technologies; social-ecological projects, movements, or organisations; or new ways of acting that can contribute to the creation of a future that is just, prosperous, and sustainable.

During the workshop, attendees were asked to consider the 'seeds of change' examples submitted and assess their impact and scalability. Two examples that were identified as particularly exciting in terms of potential impact are detailed in Box 3 and Box 4.

### Box 3: Warm Wales - Healthy Homes Healthy People (HHHP) case study

Healthy Homes Healthy People (HHHP) addresses fuel poverty and health inequalities by offering practical energy efficiency and health support to vulnerable households across Wales.

#### Key Aims:

- To identify vulnerable households and provide immediate, person-centred support.
- To offer services in home safety, energy efficiency, fuel affordability, household income maximisation, and heating improvements.

#### Delivery:

- Warm Wales recruits, manages and trains community workers specifically to recognise the symptoms of an unhealthy home environment with the aim of providing relevant support and services to ensure residents have a warm and safe home.
- Case workers work closely with local partners (e.g. GPs, local charities) to ensure holistic care.
- Support includes home safety, household income maximisation, energy saving advice, benefit checks, and heating system improvements.
- Promotes health and wellbeing by ensuring residents have safe, warm homes.

#### What is the impact?

- Supported areas with high vulnerability, using vulnerability mapping.
- Supported over 3,700 households, helping them achieve warmer, safer, and healthier living conditions and facilitated financial savings exceeding £2.75 million.
- Funding from the Vulnerability and Carbon Monoxide Allowance (VCMA) Fund through Wales & West Utilities has enabled the work to be scaled up so that support is provided across all of Wales and the South West of England.

<sup>1</sup> For more information on the seeds of change exercise please see [WCVA \(2021\) Building Better Futures Toolkit](#)

### How can this influence policy?

- This supports key policies on vulnerable households and energy efficiency. Vulnerability mapping allows resources to be effectively targeted, an approach that policymakers can replicate for more efficient allocation of support.
- The partnership between housing, health, and welfare services creates a comprehensive support system that could inform integrated service delivery at a policy level.
- The initiative's success in scaling across regions provides a model for broader application.
- Financial savings of £2.75 million highlight the economic impact, demonstrating both immediate and long-term benefits.
- Collaboration with Wales & West Utilities VCMA funding also offers a valuable model for integrating existing infrastructure to expand services.

### Box 4: Caredig - Trauma-Informed Approach case study

In 2019, Caredig (a housing association) initiated a shift towards becoming more trauma-informed in its service delivery and support for tenants, service users, and staff.

#### Key aims:

- To use a trauma-informed approach that recognises the widespread impact of trauma on individuals' lives and a shift in focus to creating safe, reliable, and trusting environments. In the context of housing, this means creating physical spaces that are safe, welcoming, and stable. The environment (whether it is the housing unit itself or the interaction between tenants and staff) should reduce stress, provide predictability, and give tenants a sense of security - critical for individuals with a history of trauma.
- The approach prioritises safety, trust, reliability, choice, and agency in all interactions. For tenants, having a say in their living conditions - such as being involved in decisions about their housing, having secure tenure, and knowing they are in a place where their needs are understood can greatly reduce the impact of trauma. The aim is to empower tenants to have control over their living situation, promoting their mental and emotional well-being.
- To implement a trauma-informed approach as a way of being, not just a list of methods or strategies to implement.

#### Delivery:

- In the summer of 2021, a total of 31 tenants and 40 staff members were interviewed as part of a comprehensive evaluation to gain a deeper understanding of their experiences with the trauma-informed approach to housing implemented at Caredig.
- The interviews aimed to gather insights into how this approach was perceived by both residents and employees, focusing on its impact on their well-being, the effectiveness of support services, and the overall quality of housing.

- By capturing tenant and staff perspectives, the research sought to identify areas of success as well as opportunities for improvement in creating a supportive environment within the housing community.
- There is now retained focus and ongoing efforts to embed this approach across the organisation.

### **What is the impact?**

- Staff found trauma-informed practices helpful in improving interactions with tenants, especially in offering targeted support based on understanding trauma. These led to more effective interventions, increasing tenants' confidence. Key elements included safe and supportive communication, flexible and empathetic case management, and staff training in recognising trauma triggers.
- Tenants expressed a strong sense of satisfaction with their relationships with Caredig staff, noting they felt heard, valued, and respected. While tenants did not specifically mention the trauma-informed changes, their positive feelings reflected the impact of the approach in their overall experience of support. Many tenants felt more emotionally supported and listened to, indicating the trauma-informed approach contributed to building trust and safety in the service environment.
- However, the process of implementing this approach has highlighted challenges for staff, particularly around feeling unsupported during transitions.

### **How can this influence policy?**

- The positive impact of trauma-informed practices at Caredig highlights the need for public policies that require housing and social service providers to integrate trauma-sensitive care into their operations, promoting safer, more supportive environments for both staff and service users. This could be scaled up across the country with ongoing training, adequate resources, and mental health support for employees, ensuring they are equipped to implement trauma-informed practices effectively across public service sectors.

## 5 Emerging areas for action

There is strong evidence linking homes and health, and the high risk of negative impacts on children of insecure and sub-standard homes<sup>10</sup>. We now need to focus on action and implementation.

What has emerged from the collaborative work with stakeholders, as summarised in this report, are four emerging areas for action. These include:

1. **Support for a housing strategy:** This strategy would address the systemic challenges identified in this summary report, such as unhealthy living conditions, affordability pressures, and homelessness, including the number of families living in temporary accommodation. This will require coordinated action across sectors including health, housing, education, and social justice to provide healthier homes for children and families in the short and longer-term.
2. **Explore opportunities to better integrate data on housing conditions:** Robust collection and integration of public health data is critical for identifying the health consequences of unhealthy housing such as cold, damp, and overcrowded living environments. Data should be disaggregated to highlight the differential impacts on children, low-income households, and other high-risk populations. Evidence-led policymaking will ensure that interventions are targeted, proportionate, and focused on reducing health inequalities rooted in housing conditions.
3. **Inclusive engagement with those who have lived experience of unhealthy homes in policy development:** Meaningful engagement means that policies truly reflect the needs of people facing housing challenges. By fostering partnerships particularly with families with young children living in poverty, policy development can be informed by real-world experiences, leading to more equitable access to healthy, safe, and affordable housing.
4. **Utilisation of Health Impact Assessments (HIAs):** Promote awareness, understanding, and application of HIAs to encourage greater use by planners and local authorities (LAs). HIAs are valuable tools for identifying the specific potential impacts of housing planning and policy decisions on children, their families, and low-income communities—helping to maximise benefits and mitigate negative effects.

### 5.1 Next steps

We will focus on translating these ideas to support policy making and implementation and ensuring that key stakeholders, including families with lived experience of poverty and unhealthy housing, remain involved in shaping the next steps.

We hope attendees of our workshop, and those reading this summary, take away a stronger sense of their role in shaping the future of healthy homes in Wales, as well as a deeper understanding of the collaborative effort required across sectors to bring about meaningful change.

## References

- <sup>1</sup> NHS Confederation. (2021). Good quality affordable homes can help improve public health and reduce widening health inequalities. NHS Confederation. <https://www.nhsconfed.org/articles/good-quality-affordable-homes-can-help-improve-public-health-and-reduce-widening-health>
- <sup>2</sup> Health Foundation. (2021). Better housing is crucial for our health and the COVID-19 recovery. The Health Foundation. <https://www.health.org.uk/reports-and-analysis/briefings/better-housing-is-crucial-for-our-health-and-the-covid-19-recovery>
- <sup>3</sup> Marmot, M. (2020). Health equity in England: The Marmot review 10 years on. Institute of Health Equity. <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>
- <sup>4</sup> World Health Organization (WHO). (2018). Housing and Health Guidelines. Geneva: World Health Organization. <https://www.who.int/publications/i/item/9789241550376>
- <sup>5</sup> Public Health Wales. (2024). Affordable Homes for Health and Well-being. [https://phwwhocc.co.uk/wp-content/uploads/2024/01/Affordable\\_Homes\\_For\\_Health\\_Wellbeing.pdf](https://phwwhocc.co.uk/wp-content/uploads/2024/01/Affordable_Homes_For_Health_Wellbeing.pdf)
- <sup>6</sup> Welsh Government. (2024). White paper: Securing a path towards adequate housing, including fair rents and affordability. <https://www.gov.wales/white-paper-securing-path-towards-adequate-housing-including-fair-rents-and-affordability>
- <sup>7</sup> Morgan, G. (2023). Good practice guide: Housing and Health. Bevan Commission. <https://bevancommission.org/wp-content/uploads/2023/08/Good-practice-guide-short-version-Bevan-Exevplar-.pdf>
- <sup>8</sup> Ace Hub Wales. (2022). Trauma-informed Wales: A societal approach to understanding, preventing, and supporting the impacts of trauma and adversity. <https://traumaframeworkcymru.com/wp-content/uploads/2022/07/Trauma-Informed-Wales-Framework.pdf>
- <sup>9</sup> Tai Pawb. (2022). Samson's Story. <https://www.youtube.com/watch?v=Q1aCtviRkVQ>
- <sup>10</sup> Hock, E. S., Blank, L., & Fairbrother, H. (2024). Exploring the impact of housing insecurity on the health and wellbeing of children and young people in the United Kingdom: A qualitative systematic review. BMC Public Health, 24, 2453. <https://doi.org/10.1186/s12889-024-19735-9>

**Shaping the future of healthy housing  
for children and families in Wales:**  
A summary of stakeholder engagement



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref: MA/JH/1886/25

Mike Hedges MS  
Legislation, Justice and Constitution Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

11 August 2025

Dear Mike,

In accordance with the inter-institutional relations agreement, I am writing to notify you that a Budget Cover Transfer between UK Government, Department for Science, Innovation and Technology (DSIT) and Welsh Government, to support digital inclusion activity in Wales has been agreed.

The funding is made up of £185,418 (revenue) and £254,950 (capital) which will further our work aligned to the Digital Strategy for Wales, Mission Two, and the Well-being of Future Generations Act National Indicator, Status of digital inclusion.

The funding is for Financial Year 2025-2026 only.

- Welsh Government will share learnings and best practice for how the funding is used to support digital inclusion with UK Government and devolved Governments.
- Welsh Government will continue to be in open, engaged, dialogue with UK Government and devolved Governments on approaches to tackling digital exclusion and work aligned to the Minimum Digital Living Standard (MDLS).

I have also copied this letter to the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs, Huw Irranca-Davies MS and the chairs of the Social Justice Committee, Health and Social Care Committee, Economy, Trade, and Rural Affairs Committee, Local Government and Housing Committee, Children, Young People and Education Committee and the Climate Change, Environment, and Infrastructure Committee

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Correspondence.Jane.Hutt@gov.wales](mailto:Correspondence.Jane.Hutt@gov.wales)  
[Gohebiaeth.Jane.Hutt@llyw.cymru](mailto:Gohebiaeth.Jane.Hutt@llyw.cymru)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Yours sincerely,

A handwritten signature in black ink that reads "Jane Hutt". The signature is written in a cursive style with a long horizontal line above the first letter 'J'.

**Jane Hutt AS/MS**

Cabinet Secretary for Social Justice, Trefnydd and Chief Whip

Ysgrifennydd y Cabinet dros Gyfiawnder Cymdeithasol, y Trefnydd a'r Prif Chwip

# Agenda Item 7.6

## Welsh Government action taken to address building safety concerns following the Grenfell Tower fire in 2017

### Action taken to improve safety in the design and construction of buildings

#### Building Safety Expert Group convened – 2018

To identify the parameters of a Welsh response to the issues raised by the Hackitt Review and to advise on the applicability of the Review to the Welsh context.

#### Building Safety Expert Group recommendations - 2019

The Group published its recommendations including a detailed programme of work to be taken forward by the Welsh Government.

#### Safer Buildings in Wales White Paper - 2021

Proposed recommendations taken through, in part, by the UK Government Building Safety Act 2022.

#### New regulations for high-risk buildings - January 2024

This includes the removal of choice of building control provider, meaning the private sector is no longer permitted to oversee higher-risk buildings. Responsibility now sits solely with the local authority.

#### Mandatory Registration of the Building Control Profession – April 2024

All building control professionals must now demonstrate their competence to continue working — regardless of sector, building type, or height. Building control bodies in both public and private sectors are also being held to account under new standards and rules, backed by robust oversight and auditing processes.

#### Part B Fire Safety - 2025

Regulations – due to come into force in December 2025 – banning metal composite cladding panels with a polyethylene core (the type of cladding that was used on Grenfell Tower) on all buildings that require building regulations approval, as well as new restrictions on external wall construction for residential buildings over 11m.

#### Proposed reforms to the building control regime for higher-risk buildings – consultation closed March 2025

We consulted on introducing a more robust building control regime aimed at improving safety in higher-risk buildings, including stronger oversight, clearer legal responsibilities for clients, designers, and contractors, and a new Gateway approval process to ensure safety is prioritised from planning through to occupation.

## **Action taken to improve the safety of buildings over 11m with in-built fire safety defects**

### Welsh Building Safety Fund phase 1 – 2021

Responsible Persons were invited to access support to carry out building safety related surveys. The Welsh Government procured a consultant to carry out the work, ensuring a consistent and high-quality approach to surveying buildings.

### Leaseholder Support Scheme - 2022

The scheme (which closed in June 2025) was designed to help people who are in or facing significant financial hardship as a direct result of fire safety issues affecting their property. Through the scheme people could access financial advice and a Welsh Government to buy apartments, allowing the leaseholder to move on.

### Welsh Building Safety Fund phase 2 – 2023

The second phase focuses on delivering the fire safety works required across both the private and social sectors.

*Social Sector* – funding has been available to Registered Social Landlords and Local Authorities since 2021. This scheme is well established, and substantial progress has already been made to remediate buildings 11 metres or more in the social sector.

*Large Developers* - 12 major housebuilders have signed the Welsh Government developers' contract, which commits them to pay for fire safety issues they are responsible for in buildings 11 metres and over they have developed over the last 30 years. The progress made by developers is monitored by officials closely to ensure works are completed as quickly as possible.

*Orphan Buildings* - For buildings where the developer has ceased trading, is not known, or the building was developed prior to 28 June 1992, the Welsh Government develops work schedules and provides the necessary funding to complete works. A reimbursement scheme has also been established to refund leaseholders for any works undertaken following Grenfell and prior to the Programme being established.

*Smaller Developers* – These are being progressed in the same ways as Orphan buildings, however, smaller developers are also subject to a financial assessment to determine whether they can make a contribution to the cost of works.

### LEASE Advisory Scheme

Delivered through Leasehold Advisory Service, this scheme provides legal advice where a dispute arises that are not covered in the Welsh Government contract terms.

### Joint Inspection Team became fully operational - 2024

We have funded the WLGA to establish the Joint inspection Team. This team is supporting local authorities and the Fire and Rescue Authorities in undertaking additional inspections of high-risk buildings.

## **Action taken to improve building safety in the future management of multi-occupied buildings**

### Building Safety Expert Group convened – 2018

To identify the parameters of a Welsh response to the issues raised by the Hackitt Review and to advise on the applicability of the Review to the Welsh context.

### Building Safety Expert Group recommendations - 2019

The Group published its recommendations including a detailed programme of work to be taken forward by the Welsh Government.

### Building Safety Programme established – 2019

With two distinct areas of work:

- addressing fire safety issues in buildings of 11 metres and over in our existing building stock, and
- a fundamental reform of building safety which looks at how we make sure that buildings with multiple dwellings are made as safe as possible in the future.

### Safer Buildings in Wales White Paper - 2021

Proposed a comprehensive set of reforms to the system in Wales. Officials have subsequently undertaken extensive engagement with stakeholders on the proposals to further refine the policy underpinning the Bill.

### **Building Safety (Wales) Bill introduced – 2025**

## **Response to the Local Government and Housing Committee: Three joint owner/occupiers and identifying the Principal Accountable Person**

- Sections 8 and 9 of the Building Safety (Wales) Bill will apply to define who is an “accountable person” (“AP”) and who is the “principle accountable person” (“PAP”).
- Section 8 identifies “accountable persons” as those who own or have relevant repairing obligations in respect of the “common parts” of a building. Section 9 defines a “principle accountable person”. Where there is only one AP, they will be the PAP. Where there are multiple APs, the PAP will be the AP in respect of the common parts that form “the external structure” of the building.
- Where, for example, joint owners are identified as the PAP, the intention is that together they will be responsible for complying with the duties and would be liable if those duties are not complied with. If all the “common parts” of a building were owned jointly by a number of long leaseholders, they would together be the PAP.
- We are aware that for smaller buildings there are a range of ownership models that may mean that no APs are identified e.g. because there are no “common parts” because the leases of the residential units together cover the entire building (section 12(2)(a)(i)). We intend to set out in regulations how APs and the PAP will be identified in these buildings (section 14). There will be consultation before such regulations are made, but current thinking is that the owners of each residential unit would together be the PAP.
- Regulations may also be made to address other ownership models (again likely most relevant for smaller buildings) to ensure that the right people are identified as APs and the PAP.

## Building Safety (Wales) Bill

### Application of certain duties placed on Principal Accountable Persons and/or Accountable Persons for each category of regulated building and landlords and/or duty holders of Houses in Multiple Occupation

Duty	Category 1	Category 2	Category 3	Relevant HMO
Requirement to register category 1 buildings and category 2 buildings	✓	✓		
Assessment of fire safety risks	✓	✓	✓	✓
Management of fire safety risks	✓	✓	✓	✓
Assessment of structural safety risks	✓	✓		
Management of structural safety risks	✓	✓		
Preparation and revision of safety case report	✓			
Occurrence recording system	✓			
Reporting to authorities	✓			
Preparation and review of residents' engagement strategy	✓			
Provision of copies of strategy (residents' engagement strategy)	✓			
Duty to apply for building certificate	✓			
Duty to keep information and documents	✓	✓	✓	✓
Give information and documents to other persons	✓	✓	✓	✓
Duty to operate complaints system	✓			
Duty to arrange consideration of complaints		✓	✓	
Co-operation and co-ordination	✓	✓	✓	✓



# The Welsh Government's Legislative Consent Memorandum on the Absent Voting (Elections in Scotland and Wales) Bill

Response to the LGH  
Committee report (July 2025)

09/09/2025

In July 2025, Local Government and Housing Committee submitted its report on the Welsh Government's Legislative Consent Memorandum on the Absent Voting (Elections in Scotland and Wales) Bill ("the Bill"), a Private Member's Bill. The report includes 2 recommendations. This is the Welsh Government's response to those recommendations

## Contents

<b>Introduction .....</b>	<b>3</b>
<b>Response to the two recommendations .....</b>	<b>4</b>
Recommendation 1.....	4
Recommendation 2.....	4

## Introduction

- 1.** The Bill introduces provisions regarding absent voting for local government elections in Wales and Scotland, as well as elections to the Senedd Cymru and the Scottish Parliament.
- 2.** While the administration of Senedd and local elections is generally devolved, Schedule 7A of the Government of Wales Act 2006 (GoWA) explicitly reserves any digital service provided by a UK Minister for elector registration. Consequently, this reservation necessitates that the Bill grants Welsh Ministers designated powers to enact secondary legislation concerning access to the Online Absent Vote Application (OAVA) system via the UK Digital Service (UKDS) for both Senedd and local government elections.
- 3.** This Bill intends to empower the Welsh and Scottish Ministers to establish regulations permitting online applications for postal and proxy votes in devolved elections via OAVA. Additionally, it provides powers for both Governments to introduce secondary legislation to require identity verification for absent voting applications. Identity checks will be conducted upfront at the point of application, requiring applicants to provide their National Insurance number or alternative documentation if necessary.
- 4.** Furthermore, the Bill standardises renewal cycles for postal voting. Following changes introduced by the Elections Act 2022—for UK Parliament elections—postal voters must now reapply every three years, rather than refreshing their signature every five years. This Bill will harmonise renewal cycles for devolved elections with those reserved to the UK Parliament.

## Response to the two recommendations

### Recommendation 1

5. The Committee recommends that the Cabinet Secretary should confirm whether the current ability to apply for postal and proxy votes in Welsh will be replicated in the Online Absent Voting Application system.
6. Response: Accept
7. The Welsh Government can confirm that the Online Absent Voting Application system is currently provided in Welsh throughout. All additional content provided for Senedd elections, and any future changes will also be provided in Welsh.

### Recommendation 2

8. The Committee recommends the Senedd should grant its consent for the UK Government to legislate on the devolved matters of the Absent Voting (Elections in Scotland and Wales) Bill.
9. Response: Noted
10. The Welsh Government welcomes the committee's recommendation to the Senedd and is grateful for their consideration of the legislative consent memorandum.



15<sup>th</sup> August 2025

John Griffiths MS  
Chair of the Senedd Local Government & Housing Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

Sent by email: [seneddhousing@senedd.wales](mailto:seneddhousing@senedd.wales)

Dear John,

I write to express the NRLA's concerns regarding the Local Government and Housing Committee's scrutiny of the Homelessness and Social Housing Allocation (Wales) Bill.

While we welcome the fact that the Committee heard from a range of experts, including those from the social housing sector, tenant organisations, and the legal profession, we are concerned that no providers of private rented housing – the sector responsible for supplying a substantial proportion of homes in Wales - were called to give their perspective on the Bill.

We believe it is a significant oversight that the Committee appears not to have considered housing provision in the round, focusing narrowly on the social housing sector without reflecting on the vital role that the private rented sector plays in meeting housing need.

With over 110,000 members across England and Wales, we are the largest membership organisation representing residential landlords. Collectively, our members own and manage around 10% of privately rented homes in England and Wales, equating to over one million properties. As such, our members play a key role in preventing homelessness and providing homes for vulnerable people, particularly where social housing supply is limited.

A key theme of our written evidence to the Committee was our concern that several of the Bill's provisions, such as the expansion of the definition of those "threatened with homelessness" to 6 months, will not take effect until there is a "robust" supply of housing. However, the Welsh Government has not defined what constitutes a "robust" supply, and, given the long-term decline in housebuilding, there seems no realistic prospect of achieving this in the near term.

We are also concerned about how the removal of the intentionality test and the introduction of the deliberate manipulation test will operate in practice. The majority of possession notices served in Wales are fault-based, often linked to arrears. As a result, tenants in breach of contract may be at a higher risk of being classified as intentionally homeless.

This is particularly pertinent in relation to rent withholding provisions under the Renting Homes (Wales) Act. Tenants are entitled to withhold rent if they believe a property is unfit for human habitation or where written statement requirements have not been met. However, only the courts can determine whether such claims are valid. If a court later disagrees with a tenant's assessment,

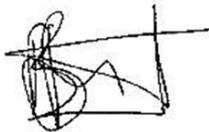
they will immediately owe all withheld rent, placing them at risk of serious arrears and eviction. This creates uncertainty for both tenants and local authorities, who cannot definitively advise on whether rent is owed.

Without clear guidance and safeguards, there is a real danger that tenants could inadvertently fail the deliberate manipulation test, undermining the Bill's aim to strengthen homeless prevention. The Welsh Government must therefore provide unambiguous guidance to enable local authorities to assess deliberate manipulation consistently and fairly.

We support the Bill and its ambition to strengthen homelessness prevention, but we urge the Committee to ensure that our concerns are reflected in its work. Only with clear definitions, safeguards and sufficient resourcing can the Bill deliver meaningful outcomes for those it seeks to support.

We would be pleased to provide further evidence to the Committee on these issues or meet to discuss in greater depth how the private rented sector can help deliver the Bill's objectives. Please contact [policy@nrla.org.uk](mailto:policy@nrla.org.uk) to arrange a convenient time.

Yours sincerely,



Ben Beadle  
Chief Executive

Copy to: Jayne Bryant MS, Cabinet Secretary for Housing and Local Government  
Lili Thompson, Senior Private Sector Housing Policy Manager

Ben Beadle  
Chief Executive  
NRLA

26 August 2025

**Homelessness and Social Housing Allocation (Wales) Bill**

Dear Ben,

Thank you for your letter of 15 August regarding the Homelessness and Social Housing Allocation (Wales) Bill and for your written response to the Committee's consultation. We are grateful for your offer of presenting oral evidence on the Bill, however I'm afraid we are unable to facilitate this due to time constraints.

The timetable for scrutinising the Bill is set by the Senedd's Business Committee and is therefore outside the Committee's control. As such, our final oral evidence session with the Cabinet Secretary for Housing and Local Government has been confirmed for our next meeting on 18 September. This session cannot be deferred due to the time constraints mentioned and other legislative commitments.

I have noted the concerns raised in your letter and have shared your correspondence with the other Members of the Committee for their awareness. The provisions relating to intentionality have been of particular interest to Members during our scrutiny of the Bill, which I'm sure we will discuss further with the Cabinet Secretary at our forthcoming evidence session.

Although it will not be possible to hear oral evidence from the NRLA on this occasion, we are grateful for your written evidence which will feed in to our consideration of the key issues for our report on the Bill. Should you wish to submit any further evidence in writing to supplement your consultation response, we would be happy to receive this by Wednesday 10 September.

Thank you for your engagement with the Committee on this and your previous contributions to our work.

Yours sincerely



John Griffiths MS, Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg. We welcome correspondence in Welsh or English.