

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

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Meeting Venue:

Committee Room 2, Senedd

Meeting date: 22 October 2025

Meeting time: 09.15

For further information contact:

Catherine Hunt

Committee Clerk

0300 200 6565

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

### **Hybrid**

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

09.00 – 09.15

#### **Public meeting**

09.15 – 10.45

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

09.15

#### **2 Building Safety (Wales) Bill: Evidence session with the Cabinet Secretary for Housing and Local Government**

09.15 – 10.45

(Pages 1 – 42)

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

Tania Nicholson, Deputy Director – Housing Quality, Welsh Government

Steve Pomeroy, Head of Fire Services, Welsh Government

Kim Phelps, Head of Building Safety Occupation Phase Policy

Jo Newth, Lawyer, Welsh Government

[Building Safety \(Wales\) Bill](#)

[Explanatory Memorandum](#)



**Senedd Cymru**  
**Welsh Parliament**

## [Statement of Policy Intent](#)

Attached Documents:

Research brief

### **3 Papers to note**

10.45

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

(Pages 43 – 48)

Attached Documents:

Paper 1: Building Safety (Wales) Bill – Letter from the Chair of the Legislation, Justice and Constitution Committee to the Cabinet Secretary for Housing and Local Government – 2 October 2025

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

(Pages 49 – 59)

Attached Documents:

Paper 2: Building Safety (Wales) Bill – written evidence from Social Housing Law Association Wales

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

(Pages 60 – 74)

Attached Documents:

Paper 3: Homelessness and Social Housing Allocation (Wales) Bill – Additional evidence from Cymorth Cymru

#### **3.4 The provision of sites for Gypsy, Roma and Travellers**

(Pages 75 – 92)

Attached Documents:

Paper 4: The provision of sites for Gypsy, Roma and Travellers – Letter from the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip – 15 October 2025

**4 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of this meeting**

10.45

**Break**

10.45 – 10.55

**Private meeting**

10.55 – 12.30

**5 Building Safety (Wales) Bill: Key issues and citizen engagement findings**

10.55 – 12.30

(Pages 93 – 121)

Attached Documents:

Paper 5: Building Safety (Wales) Bill – Summary of citizen engagement

Document is Restricted

Jayne Bryant MS  
Cabinet Secretary for Housing and Local Government

2 October 2025

Dear Jayne,

### Building Safety (Wales) Bill

Thank you for appearing before Committee on 29 September 2025 to discuss the Building Safety (Wales) Bill ("the Bill").

During the session you agreed to respond to some questions that we asked during the session in writing. We would also be grateful if you could respond to some additional questions to support our scrutiny of the Bill. These questions are set out at annex A.

Please could you respond no later than 29 October?

I have copied this letter to the Chair of the Local Government and Housing Committee.

Yours sincerely,



Mike Hedges  
Chair

# Annex A: Questions to the Cabinet Secretary for Housing and Local Government re. the Building Safety (Wales) Bill

## Legislative competence

1. We understand that certain provisions of the Bill that may affect the private interests or hereditary revenues of the King or the Duke of Cornwall and so, in our view, will require the signification of Crown consent under section 111(4) of the 2006 Act and Standing Order 26.67. Could you please tell us which provisions in the Bill you anticipate will require King's or Duke of Cornwall's consent and what is the status of those requests?

## Existing legislative framework

2. At our evidence session on 29 September, your official spoke about the Regulatory Reform (Fire Safety) Order 2005, its lack of applicability with housing law, and how the Bill aims to address those inconsistencies. Do you have anything further to add about whether this legislation combined with UK legislation amended by the Senedd, recently enacted UK legislation (e.g. the *Building Safety Act 2022* ("the 2022 Act")), and associated subordinate legislation, will affect the accessibility and coherence of the law in relation to building safety in Wales? We would welcome any additional examples of how the Bill is improving the accessibility and coherence of the statute book in relation to building safety.

## Development of the Bill

3. As we discussed on 29 September, there has been a very significant delay between the Grenfell tragedy in June 2017 and the development of this Bill. During the Local Government and Housing Committee's scrutiny of the Building Safety Bill LCM in November 2021 (already over four years after the Grenfell fire), the then Minister for Climate Change stated that:

*"... in the light of the Grenfell tragedy and the need to respond to the subsequent independent review of building regulations—the Hackitt review that Members will be familiar with—we need to respond as quickly as possible, and this Bill is the most effective way to do that. We've made it clear as a Government that, whilst protecting the devolution settlement remains a critical area of priority for us and that our general principle is to legislate in the Senedd, we should be open to taking*

*a pragmatic approach to using UK legislation to achieve the Welsh Government's objectives where that's necessary and it completely suits our policy agenda."*<sup>1</sup>

How would you respond to concerns that, by enacting legislation in Wales via the UK Parliament in 2021, and taking an additional four years to introduce this Bill to the Senedd, the Welsh Government has failed both to respond quickly to the Grenfell tragedy and to protect the devolution settlement?

4. You have stated that this Bill was developed in response to the Grenfell tower fire of 2017 and the Hackitt review a year later. You issued a white paper on the Bill's proposals in January 2021. However, in evidence to the Local Government and Housing Committee, you explained that some issues are still unresolved, which may lead to substantive amendments to the Bill (for example, in relation to how the Welsh Government can ensure consistency of application of the regulation regime across the 22 local authorities<sup>2</sup>). Why did you not use the time since the White Paper to publish a draft bill for public consultation, which could have resolved some of these issues before the Bill was introduced?

## **Implementation of the Bill**

5. The Bill provides the Welsh Ministers with the power to make subordinate legislation in 65 areas. How many of these regulations will need to be in place in order for the Bill to be fully implemented?
6. Local Authority Building Control (LABC) has highlighted that under regulations currently in force made under the 2022 Act, a building is considered a "higher-risk building" if it contains at least *one* residential unit. However, for the purposes of the Bill, a "regulated building" must contain at least *two* residential units. They argue that this inconsistency "may lead to confusion in the wider industry".<sup>3</sup> How do you respond to these concerns, particularly given your general views about the importance of alignment between this Bill and the 2022 Act?

## **Regulation-making powers**

7. There are 11 regulation-making powers to amend primary legislation (Henry VIII powers) in the Bill. Please set out a justification for why *each* Henry VIII power is necessary, reasonable and proportionate.

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<sup>1</sup> [Local Government and Housing Committee, 17 November 2021](#), RoP [100]

<sup>2</sup> [Local Government and Housing Committee, 17 July 2025](#), RoP [133-206]

<sup>3</sup> [Written evidence: BSWB.19 - LABC](#)

8. Can you set out why you believe that it would be appropriate for a government in the Seventh or Eighth Seneddau to change key matters in the Bill through secondary legislation, as is currently permitted by the broad relegation-making powers in the Bill, rather than by bringing forward primary legislation and allow full Senedd scrutiny, including by means of an expedited process if necessary?
9. Can you confirm whether some of the broad regulation-making powers in the Bill (such as those in section 16) would allow a future government to exclude certain buildings or structures from the regulatory regime? If so, have you considered inserting safeguards that would limit the use of those powers (for example, by limiting the power to *extending* the list of structures that fall within the regulatory framework of the Bill, rather than enabling future Welsh Government to also *remove* structures from that list)?
10. Despite agreeing in principle that the powers granted to Welsh Ministers are appropriate, some key stakeholders including the WLGA have raised concern about how future regulations will be developed, and the extent to which the sector will be consulted.<sup>4</sup> Do you have anything further to add to provide reassurance to these stakeholders and others about the use these powers by future Welsh Governments?
11. Can you confirm that the current duties “to consult such other persons as Welsh Ministers consider appropriate” would in practice oblige future Welsh Governments to consult meaningfully with residents whenever residents have legitimate interests in the regulations or guidance being developed?
12. In your response to our question about why a definition of “storey” is not included on the face of the Bill, you explained that including technical detail such as the definition of a storey or a mezzanine “risks overcomplicating the Bill”. However, a definition of mezzanine is included in section 118(3) of the 2022 Act, and indeed the Act also provides some detail about the definition of a storey itself (section 118(3)). You went on to state that setting out the definition of storey in regulations, rather than on the face of the Bill, will help to ensure consistency with the 2022 Act and its subordinate legislation. Can you provide further clarity about your decision not to include a definition of “storey” and other key terms of the face of the Bill?
13. One of the powers given to the Welsh Ministers in the Bill includes a power for the Welsh Ministers to change the definition of a “building”. During scrutiny, you told us that the definition of building may need to be amended if certain types of structures are being

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<sup>4</sup> Written evidence: BSWB 14 - Welsh Local Government Association; Written evidence: BSWB 22 - Community Housing Cymru

interpreted as buildings in a way that was not intended by the Bill, or if new types of multi-occupied residential accommodation emerge. Please can you:

- a. clarify whether consideration was given to taking alternative drafting approaches to include safeguards against different structures being used as buildings on the face of the Bill?
  - b. set out examples of structures that you may want to exclude from the regulatory regime set out in the Bill (for example, your official cited large floating barges)?
14. Section 29(3) gives regulation-making powers for the Welsh Ministers to specify requirements relating to the competence of fire risk assessors. Given the importance of the qualifications of fire safety risk assessors, why should this be left to regulations and subject only to scrutiny through the annulment procedure?
15. Section 33(7) gives regulation-making powers to the Welsh Ministers to make provision in relation to the making of structural risk assessments, including expertise, qualifications and experience of assessors. Why are you satisfied that this should be left to regulations and subject only to scrutiny through the annulment procedure?
16. Section 65(3) inserts new section 49B to the *Landlord and Tenant Act 1987* requiring a landlord to give the tenant a notice containing relevant building safety information. New section 49B(5)(e) provides a power for the Welsh Ministers to make regulations that can prescribe other information as relevant building safety information. Those regulations are made under the Senedd annulment procedure (new section 49B(8)). However, the Explanatory Memorandum states that this power will be subject to the draft affirmative procedure. Can you confirm which procedure will apply to this power, and whether any changes to the Explanatory Memorandum are necessary?

## Guidance

17. The only guidance that the Welsh Ministers are mandated to issue under the Bill relates to principle accountable persons and landlords of houses of multiple occupation for certain duties relating to the assessment of fire safety risks. Have you given any further consideration to whether a duty should be placed on the Welsh Ministers to produce guidance in other areas (for example, your official cited structural safety as one potential area where compulsory guidance might be worthwhile)?
18. No Senedd scrutiny procedure is in place for the guidance that the Welsh Ministers must issue under section 98(1) or may issue under section 98(2). Do you consider that this guidance should be subject to the draft annulment procedure?

19. Do you have a list of all the guidance that you plan to publish as a result of this Bill? If so, is there a timetable for the publication of the this guidance, and can this be shared with committees, along with a list of all planned guidance?

Please use this template to draft your response and email your response to [SeneddHousing@senedd.wales](mailto:SeneddHousing@senedd.wales)

## **Evidence from: Social Housing Law Association (“SHLA”) Wales**

Drafted by Sarah Salmon, barrister at Cornerstone Barristers and Caroline Stubbs, Director of Legal and Governance, Pobl Group (with input from Devonshires Solicitors) on behalf of the SHLA Wales Committee and SHLA Wales members

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Senedd Cymru | Welsh Parliament

### **Y Pwyllgor Llywodraeth Leol a Thai | Local Government and Housing Committee**

Bil Diogelwch Adeiladau (Cymru) | Building Safety (Wales) Bill

You do not need to answer every question, only those on which you wish to share information or have a view.

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## **1. What are your views on the general principles of the Bill, and whether there is a need for legislation to deliver the stated policy intention?**

The Building Safety (Wales) Bill (“the Bill”) is part of the Welsh Government’s response to the Grenfell Tower fire in June 2017. It addresses issues identified in the Hackitt Review, the Grenfell Tower Inquiry and by the Welsh Government’s Building Safety Expert Group.

The Grenfell Tower fire highlighted the vital need to prioritise safety at every stage of a building’s lifecycle. Effective management is essential to identify and minimise new and emerging risks wherever reasonably possible. The Bill ensures that safety remains a central focus during the occupation phase of a building, ultimately safeguarding residents.

SHLA Wales is supportive of the Bill and agrees with Community Housing Cymru (“CHC”) and the social housing sector in general that the reforms it proposes are both necessary and overdue to improve resident safety, accountability on behalf of responsible persons and public confidence in the social housing sector.

SHLA Wales does, however, have several specific concerns in respect of the Bill which we have outlined below.

## **2. What are your views on the provisions set out in Part 1 of the Bill – Safety of buildings containing two or more residential units (sections 1 -66 and Schedule 1)? In particular, are the provisions workable and will they deliver the stated policy intention?**

### General comment

SHLA Wales notes that a lot of the detail is left to future regulations and guidance. Whilst this features in the regime in England following the Building Safety Act 2022 (“BSA 2022”), the number of regulations issued was chaotic and Wales is not operating under the same urgent setting.

The resourcing and training for social housing providers in Wales that will be required to prepare for the Bill to become law will be significant. It is suggested, and hoped by the social housing sector, that there will be the necessary lead in time and that includes knowing what will be required under any regulations and guidance. Lessons need to be learnt from the Renting Homes (Wales) Act 2016 where there was a flurry of activity in a relatively short space of time, including immediately before the 2016 Act came into force.

### Three categories of building

This is a key difference between the English and Welsh regime. ‘Regulated building’ means any building that contains at least 2 residential units and is wholly, or mainly, in Wales (with limited excluded buildings). Residential units include dwellings, HMOs and any other unit of living accommodation. There are three categories of ‘regulated building’:

1. Category 1 – at least 18 metres in height or at least 7 storeys
2. Category 2 – between 11 and 18 metres in height and between 5 to 7 storeys
3. Category 3 – is less than 11 metres in height and fewer than 5 storeys

There are differing levels of duties that apply to the categories of buildings, but all are caught by the new regime.

SHLA Wales is broadly supportive of the Bill’s proposal that regulated buildings be divided into 3 categories. We accept that the intention behind this is to

ensure the safety of all multi-occupied buildings in Wales and to establish accountability for the safety of those buildings.

We are conscious, however, that in England, where a different approach has been taken and the Building Safety Act 2022 (“BSA 2022”) prescribed only buildings of 18+ metres in height as ‘higher risk’, the introduction of a building safety regime has presented significant challenges in terms of pressure on the Building Safety Regulator’s resources as well as pressure on social housing providers.

In Wales, where it is proposed that the building safety regime will apply to three categories of building, it seems likely that those same pressures will face local authorities in their capacity as the building safety authority and, potentially, be greater due to the application of the regime to three categories of building. We are concerned about the extent of new requirements and duties that would be placed on social housing providers which will inevitably involve pressures on its workforce and the need to source those with specialist skills to deliver the requirements of the Bill.

Given the size of Wales, it is inevitable that there will be competition to secure the services of those specialists and pressures on those specialists to deliver. At a time when social housing providers are experiencing financial pressures associated with a number of other duties and requirements, SHLA Wales suggests that delivery of these requirements and duties will be difficult without additional funding. Without this, costs may be passed onto residents, which should be avoided at a time when many are feeling the impact of the ‘cost of living crisis’.

### **Principal Accountable Person and Accountable Person**

The Bill provides that an Accountable Person (“AP”) is a person who holds the legal estate in possession of the common parts of the building (or any part of them) or has a relevant repairing obligation over those parts. The Principal Accountable Person (“PAP”) is the AP (if there is only one) or the person that holds the legal estate in possession in the external structure of the building or has the relevant repairing obligation over it (including foundations, external walls and roof).

The requirement applies to all ‘regulated buildings’, not just those over 18 metres or 7 storeys.

Unlike the English regime, an AP can include those who have obligations under contract, or any degree of control. Those categories of persons are excluded in the English regime.

Overall, SHLA Wales agrees with the establishment of the roles of PAP and AP for the purposes of creating clear responsibilities and accountability. The number of buildings in scope, however, adds to the complexity of determining PAPs and APs and there are several concerns which we take in turn.

**First**, consider amending 10(2) to allow for an application by one PAP where more than one person meets the definition.

Under the Bill, where there is more than one person who meets the definition of PAP, the building safety authority will have a power to make a determination as to who is the PAP for the building. As currently drafted, clause 10(2) sets out if there is more than one person who could be a PAP then any application for a determination may only be made jointly. We are unclear why the Bill does not make provision for any potential PAP to make an application on a singular basis. The whole thrust of the policy regime is that there should be one PAP so as to ensure one clear duty holder providing certainty to the building safety authority and/or any other interested parties. Assuming this provision is to save costs of applying to the residential property tribunal ("the tribunal") under clause 11, we see no reason why an application could not be made by one potential PAP for a determination as to who the PAP should be.

**Secondly**, not learning from the decisions and the applications made to the First-tier Tribunal (Property Chamber) in England.

What if there is consent as to who should be the PAP?

In relation the regime in England, Judge Sheftel has queried (in the case of Ovington Court, 197-205 Brompton Road, London, SW3 1LB (LON/00AW/BSG/2024/0001)) whether an application to the tribunal is actually required where there is an agreement. The comments are, however, not authoritative as he has made them in passing without making a decision as to whether or not the position is correct. He said at [15]:

"...it is said that no provision is made for the parties to agree between themselves who is the principal accountable person for a higher risk building without reference to the tribunal. I express no finding on this, save to note that where a party ...has already been registered as the principal accountable person and there is no dispute that they should be principal accountable person, it is not

obviously apparent that a determination by the tribunal is also required. Nevertheless, the tribunal will of course proceed to determine the present application, as an interested person is entitled to seek the tribunal's determination under section 75(1)(b) of the 2022 Act ... and there may be advantages to the parties in having certainty and/or being bound by their agreement, both of which a determination will provide".

As matters stand, many PAPs are making applications to the First-tier Tribunal even where the parties consent. The Bill could solve this issue by making it clear whether or not an application needs to be made where the two or more potential PAPs agree on the position of which one of them is the PAP.

Another issue that has recently arisen in the First-tier Tribunal is whether or not a person can make an application where there is doubt over the PAP but the person making the application does not meet the test: see *Globe View House, 27 Pocock Street, London, SE1 0FU (LON/00BE/BSG/2025/0600)*. In that case, it was Clarion Housing Group's position that it should not be an AP as it did not fall within the relevant definition in section 72(1) of the BSA 2022: it was said that Clarion neither holds a legal estate in possession in any part of the common parts, nor that it is under a relevant repairing obligation in relation to any parts of the common parts of Globe View House.

Under section 75(1) of the BSA 2022, an application to determine who is an AP for a building and/or the part of the building for which any AP for the building is responsible, may be brought by an interested person. 'Interested person' is defined in section 75(3) as: (a) the Regulator; (b) a person who holds a legal estate in any part of the common parts (or who claims to hold such an estate), or (c) a person who is under a relevant repairing obligation in relation to any part of the common parts (or who claims to be under such an obligation).

Judge Sheftal at [17] said the following as to whether or not a person who does not meet the definition could make an application for a determination by the First-tier Tribunal (emphasis added):

"The difficulty in the present case, is that Clarion contends that it neither holds a legal estate in any part of the common parts, nor is under a relevant repairing obligation in relation to any part of the common parts. In other words, due to a quirk in the legislation, it might be suggested that a party who has been registered as an accountable person but who does not believe itself to be one, does not fall within the list of persons who may bring an application under section 75 of the BSA. Of course, if Clarion were to fail in its submissions, this would necessitate a finding that it is under a relevant repairing obligation in

relation to any part of the common parts and so would bring it within section 75(3)(c). In any event, ... there was no dispute that the RTM Company also sought a determination as to the substantive issue in the application and so the RTM company could, in essence, be treated as an applicant under rule 10 of the Tribunal Procedure (First-tier Tribunal) (Property Chamber) Rules 2013 insofar as necessary. Certainly, there is no question that the RTM Company falls within the definition of an 'Interested Person' in section 75(3). Accordingly, both parties agreed that the application fell within the tribunal's jurisdiction and should proceed".

SHLA Wales' view is that the Bill could account for this quirk by adding in a further definition of 'interested person' under clause 11.

**Thirdly**, the position of the building safety authority.

What is the situation where the local authority holding the role of building safety authority is an AP and/or PAP?

Where there is one or more person who meets the definition of a PAP and one of those is the local authority, the building safety authority will be in a position of decision-making against itself. Clear provision should be made to deal with this situation and it appears to us this could be added to clause 11 *i.e.* in circumstances where the local authority meets the definition of a PAP and is the authority who is also the building safety authority, any application to determine who is the PAP must be made to the tribunal.

**Fourthly**, the potential scope of the AP role. As drafted, the Bill provides that anyone with responsibility for maintaining all or part of the common parts may be an AP. Further, an AP can include those who have obligations under contract, or any degree of control. This suggests that, for instance, a contractor instructed by the landlord or management company of a building to undertake works to the common parts may be an AP for what might be a matter of hours whilst undertaking those works. This cannot have been intention of Welsh Government when drafting clause 8(2)(b) of the Bill.

There needs to be good regulatory understanding of who the duty-holders are and what duties they have, and it is suggested that amendments are made to clarify the position especially of any duty-holders by way of agency.

### **Enforcement powers**

In relation to the powers of enforcement provided for in Part 1 of the Bill, we note that these apply to an AP but that there is no equivalent power in the Bill for

residents or other interested parties to take enforcement action. The explanatory note to the BSA 2022, Annex A is a useful summary of applicability to Wales, and it can be seen:

- section 121 (associated person) – does not apply;
- section 123 (Remediation Orders) – does not apply; and,
- section 124 (Remediation Contribution Orders) – does not apply; but
- section 130 (Building Liability Orders) – does apply

We find the lack of such enforcement avenues to be a concerning omission and invite the Welsh Ministers to look at this again as the tools have been well used in England to take action (including when there has been inaction on the person with responsibility to remediate).

Moreover, SHLA Wales has concerns about the practicalities of entry (or the access provisions) at clause 53 and the contravention provisions at clause 55. These provisions can only be enforced by the tribunal. It is our understanding that the tribunal in Wales has no power to enforce its own orders. As such, once an order for entry or contravention order is made, if it is not complied with the matter will need to be transferred to the county court for enforcement. We are not sure, when these are provisions to tackle urgent issues, why such applications cannot be made to the county court in the first instance. The ability to deal with matters urgently is lost when you must apply to the tribunal but on breach have to transfer the case to the county court.

### **Withholding rent**

We have particular concern regarding clause 65 of the Bill which purports that residents will be able to withhold rent and other charges in the event they do not receive certain documents. Although SHLA Wales is supportive of the Bill's intention to strengthen accountability, we expect this provision to receive opposition from the sector. Lessons learned from the Renting Homes (Wales) Act 2016 with regard to withholding of rent and ECRs has taught us that clear regulation and guidance is required as to how this provision will operate in practice to avoid the uncertainty which led to test cases before the Divisional Court under the 2016 Act.

## Adult

Under the BSA 2022, adult is defined as those who are 16 years old or above. In Wales, the definition is those over 18 years old (see clause 111). SHLA Wales assumes the reason for this is due to the extension of the number of buildings to which the Bill applies which will, of course, cause an increased administrative burden on those with any relevant duties which will include the social housing sector. Whilst the social housing sector is keen not to be overloaded from an administrative point of view, SHLA Wales highlights the lacuna where residential units are occupied by those who are 16 or 17 who, for example, will not be given a copy of any resident engagement strategy and will not be under the same duties as others in relation to fire safety risk.

### Resident engagement strategy

It is an onerous obligation to provide a strategy “as soon as possible”. SHLA Wales would invite the Welsh Ministers to consider this phrase further.

### **3. What are your views on the provisions set out in Part 2 of the Bill – Fire safety in certain houses in multiple occupation (sections 67 – 80)? In particular, are the provisions workable and will they deliver the stated policy intention?**

SHLA Wales is supportive of the inclusion of HMOs within the scope of the Bill, given the risks associated, particularly with regard to fire safety, with these buildings.

As with Part 1 of the Act, we note that enforcement action (e.g. an application for an access order) may be taken by a duty holder in relation to a relevant HMO but there is no reciprocal right for an occupier of a residential HMO to take enforcement action against a duty holder who is not complying with its duties pursuant to the Bill. SHLA Wales believes this to be a concerning omission.

SHLA Wales also makes the same observations it has under question 2 as to the enforceability of any such orders that are made by the tribunal in circumstances of breach.

**4. What are your views on the provisions set out in Part 3 of the Bill – Enforcement and investigatory powers (sections 81 – 97 and Schedule 2)? In particular, are the provisions workable and will they deliver the stated policy intention?**

SHLA Wales is broadly supportive of the provisions set out in Part 3 of the Bill and believes that they will deliver the stated policy intention. However, we are conscious that much of the detail remains to be published in the form of Regulations and repeat the general concern set out under question 1 above.

There is also an issue as to how the building safety authority will be able to carry out the enforcement actions, including serving notices, on itself if it is a relevant duty-holder against whom enforcement action needs to be taken. The problem does not appear to be dealt with within the Bill and, if that is right, is an omission which should be dealt with.

**5. What are your views on the provisions set out in Part 4 of the Bill – Supplementary and general (sections 98 – 114 and Schedules 3-4)? In particular, are the provisions workable and will they deliver the stated policy intention?**

As set out at the beginning of this response, SHLA Wales has general concerns regarding the volume of regulations and guidance which this Bill proposes will be published. We appreciate that Welsh Ministers must reserve the power to publish such guidance and regulations in certain circumstances including to give full effect to the primary legislation in question.

We believe, however, there is risk in reserving such a degree of detail to regulations and guidance. The courts interpret the law first by reference to the primary legislation and then secondary legislation. Guidance is not all that helpful especially if it is non-statutory guidance and/or in conflict with the legislation and/or confusing. This can lead to difficulties in the understanding and interpretation of the primary legislation not only when it is put to the test in court but also for those who need to apply the legislation. Again, lessons need to be learnt from the Renting Homes (Wales) Act 2016. The ECR case demonstrated what can happen when the guidance is not in accordance with the provisions of the legislation.

It would therefore be the preference of the social housing sector in Wales for more of the detail which is proposed to be reserved to regulations and guidance to be included within the body of the primary legislation. If secondary legislation is to be used, as above, it needs to be available with a good lead in time.

SHLA Wales also has reservations about the potential effectiveness of local authorities as building safety regulators. Some of those reservations are set out above. More generally, unlike in England, where there is a single building safety regulator, the approach proposed by the Bill in Wales will lead to multiple local authorities taking on the duties of building safety regulator. This will, in our view, inevitably lead to a position where different local authorities are able to resource and carry out these functions to different degrees, leading to inconsistencies across the country.

## **6. What are the potential barriers to the implementation of the Bill's provisions and how does the Bill take account of them?**

The Bill reserves powers to Welsh Government to publish secondary legislation and guidance. SHLA Wales has concerns about the volume of detail to be published in that format. As referenced above, we strongly believe that as much detail as possible should be included in the primary legislation. The primary legislation will be the key reference point for social housing providers, duty holders and the courts. Reserving important detail to secondary legislation or guidance could not only lead to uncertainty and the inability to plan, pending its publication, but could potentially lead to stakeholders being unclear as to where to find information or, in the case of guidance, it not having legal effect.

There is also concern about the significant time and resources (both human and financial) that the social housing sector will need to apply in implementing the proposed regime. This may include resources associated with the creation of building safety case reports, maintaining the 'golden thread' of information and potentially the creation of new digital systems (or updating of existing ones) to take account of new processes.

## **7. How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation, as set out in Chapter 5 of Part 1 of the Explanatory Memorandum)?**

As above.

## **8. Are there any unintended consequences likely to arise from the Bill?**

SHLA Wales believes that we have addressed these in response to the questions above.

**9. What are your views on the Welsh Government's assessment of the financial implications of the Bill, as set out in Part 2 of the Explanatory Memorandum?**

SHLA Wales believes the financial implications of the Bill as set out in Part 2 of the Explanatory Memorandum do not fully account for the potential costs associated with the Bill for social housing providers. Although SHLA Wales is supportive of the principles behind the Bill and the benefits it seeks to bring in terms of improved building safety and accountability, it will require social housing providers to potentially have to fund the creation of/improvements to digital systems, workforce training and recruitment or engagement of specialists, which may come at a premium as demand rises. As most social housing providers operate on a not-for-profit basis, in a highly regulated sector that already makes significant demands of it, these costs will place added pressure on them. We would support a more robust financial assessment to establish the true impact the Bill is likely to have on social housing providers from a financial perspective, both in the short and long term.

**10. Are there any other issues you would like to raise about the Bill and the Explanatory Memorandum or any related matters?**

It is SHLA Wales' view that it is crucial for the Bill to be placed in alignment with other legislative and regulatory requirements connected with property condition and building safety. For instance, the Fire Safety Order, the Renting Homes (Wales) Act, the Welsh Housing Quality Standard (WHQS) 2023 and the Housing Health and Safety Rating System. There is also potential for overlap with the ongoing consultation on strengthening leaseholder protections over charges and service charges. Failure to align has the potential to create duplication, conflict or gaps. In our view, it is crucial to address this to ensure social housing providers have absolute clarity on the extent of their duties and so that they can best provide residents with a safe home.

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

### **Supplementary evidence**

Cymorth Cymru | September 2025

#### **Introduction**

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**Cymorth Cymru warmly welcomes the Homelessness and Social Housing Allocation (Wales) Bill. On the whole, this is a progressive piece of legislation that will transform how we prevent and respond to homelessness in Wales.**

The Housing (Wales) Act 2014 was ground-breaking in its approach to prevention, by introducing duties on local authorities to take steps to prevent homelessness, a move that received international praise and has since been replicated in other countries. However, the world has changed significantly since 2014, and other nations have taken their own legislative leaps forward. It is important that Wales recognises the changing environment, learns from progress elsewhere, and continues on its path to making homelessness rare, brief and unrepeatable.

Over the last decade, Wales has developed a much better understanding of the impact of adverse childhood experiences and other traumatic events on people's lives, as well as the need to take a more inclusive and compassionate approach to supporting people in distress. This continues to shape policy development and should be at the heart of this legislative change. The experience of, and response to, the Covid-19 pandemic also provides important context. The response of the homelessness and housing support sector – both local government and their third sector partners – was remarkable and life-saving. The collaboration across services was invaluable, as was the Welsh Government's decision to disregard priority need and intentionality, in order to get everyone inside and protect them from infection. Since then, there has been a strong desire to avoid a return to a system that puts barriers in the way of people getting the help they need.

The Homelessness and Social Housing Allocation (Wales) Bill recognises the changing context and the need to address weaknesses in our current legislation. It represents the desire to continue the inclusive approach we took during the pandemic, and cements the realisation that homelessness is a public service issue, not just a housing issue.

#### **Considerable engagement and preparatory work**

As members consider and scrutinise the Bill, we would like to emphasise the huge amount of work that has led to its publication, involving a wide range of stakeholders and perspectives, with careful consideration given to the proposals in front of the committee today. This includes the evaluation of the Housing (Wales) Act 2014, the work of the Homelessness Action Group in 2019/20, the Independent Review of Priority Need, and most recently, the work of the Expert Review Panel.

Chaired by one of the UK's most respected experts in homelessness policy and legislation, Professor Suzanne Fitzpatrick, the Expert Review Panel included experts and representatives from a range of organisations and perspectives. There were four representatives from local government on the panel, as well as representatives of social landlords, support providers and housing advice services, with additional expertise from academia and the legal profession. The Welsh Government also coordinated a local authority reference group, which ran alongside the Expert Review Panel and enabled all twenty-two local authorities to inform the work. Engagement events were held with a range of stakeholders, and additional research helped to supplement the evidence that was considered by the panel.

### **The voice of Experts by Experience and frontline workers**

As a member of the Expert Review Panel, we represented homelessness and housing support services across Wales, but crucially, we also led engagement with frontline workers and people with experience of homelessness. As part of our work coordinating the Frontline Network Wales, we held several sessions with frontline workers from a range of organisations, including local authorities, housing associations and third sector support providers. We discussed their experiences of working to help people avoid or exit homelessness, the barriers they face, and what changes should be made to improve the system. Two papers were submitted to the Expert Review Panel for their consideration. The first focused on the homelessness and housing system, and the second focused on the role of public services. Quotes from frontline workers are included in this evidence paper, highlighted in red text.

We are extremely proud of our engagement with people who have experienced or been at risk of homelessness. We will refer to them as 'experts by experience' in this evidence paper. We engaged with over 300 experts by experience during the Expert Review Panel's work, through online surveys, open engagement events, one-to-one interviews, visits to prison, probation services, temporary accommodation and a reconnection service, and time spent with people on the streets. We submitted [six papers](#) to the Expert Review Panel. These were based entirely on the views and experiences of experts by experience, with each focusing on the specific topic of discussion at the relevant panel meeting. The voices of experts by experience had a huge impact on the Expert Review Panel's recommendations, the subsequent White Paper, and the Homelessness and Social Housing Allocation (Wales) Bill. **We want to ensure that their voices remain at the forefront of committee members' minds during the scrutiny process.**

### **Constructive compromise – reaching consensus**

An important feature of this legislation is that it is built on constructive compromise. There were many elements of legislative reform that members of the Expert Review Panel agreed on, such as the need for earlier intervention and the proposed legal duties on public services. However, there were some elements that caused disagreement, or where consensus was more difficult to reach. As a result, every member of the panel had to compromise on something, in order to agree the report and recommendations for the Cabinet Secretary. This means that no stakeholder is likely to be entirely happy with all elements of the Bill – including Cymorth Cymru.

While we have highlighted our discomfort with some of the proposals in our oral and written evidence, we have also tried to approach this in the spirit of constructive compromise and respect the decisions taken by the Expert Review Panel. There are several proposals within this Bill that we are uncomfortable with, but we accept that some of these have been included to alleviate other stakeholders' concerns about other proposed changes. We have been transparent about this in our evidence and tried to respect the spirit of compromise from the Expert Review Panel. Without this approach, we could miss this opportunity to strengthen our approach to homelessness – which would be a huge disservice to the people of Wales.

## Implementation timeline

One of our concerns about implementation is the implied timeline within the explanatory memorandum. While we understand that this is not set in stone, we would be very concerned if key elements such as the abolition of priority need and intentionality did not happen until 2030/31. Firstly, these legal tests are rarely used (see our evidence below), so the transition would not require a major change from the status quo. Secondly, these tests exclude homeless people from getting help, put them at risk, and directly contradict the trauma-informed approach advocated by the Welsh Government. Every day that they continue to be used, people are shut out of the system and further traumatised. We see no legitimate reason to delay their implementation until 2030/31, and advocate that this happens by the end of 2028/29 at the very latest.

## Improving prevention

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### Meaning of threatened with homelessness (1)

*“If people knew they could contact the council early for advice, if they knew they had that option, it could help prevent homelessness and intentionality.” (Frontline worker)*

We strongly support the proposal to extend the definition of ‘threatened with homelessness’ from fifty-six days to six months. There is widespread support across all key stakeholders for earlier intervention, as this is likely to prevent harm and the need for more costly interventions later on. While fifty-six days may have been sufficient to prevent homelessness in 2014, the current crisis in the housing market means that it is extremely difficult to find alternative housing solutions within that time period. Six months is a far more appropriate and reasonable time period to prevent homelessness. The increase of the period to six months also aligns with recent changes to the no fault eviction notice period, which was extended to six months following implementation of the Renting Homes (Wales) Act 20216. The failure to prevent homelessness can have a terrible and long-lasting impact on people’s lives, and also comes at a considerable cost to the public purse. Intervening early and increasing the chance of successful prevention is in the interest of everyone.

### Duty to assess (3) and

### Prevention, support and accommodation plans (4)

*“Housing support services should not just focus on housing. Need whole person approach.” (Expert by experience)*

*“Be more flexible, accessible and innovative about contacting people.” (Expert by experience)*

*“Professionals come and go and you get tired of always having to tell your story.” (Expert by experience)*

*“Personalised support, better staff training on The Social Model of Disability, homeless prevention in practice, The Equality Act 2010, mental health training.” (Expert by experience)*

*“If you’re struggling to get hold of tenant, try and see them – there’s all sorts of reasons why people don’t answer the phone or open a letter.” (Expert by experience)*

We support the amendments to the Housing (Wales) Act 2014 that aim to make Wales’ approach to homelessness more person centred. We strongly welcome the strengthening of the assessment process to include reference to the barriers people may face to living independently, and the personal characteristics and circumstances of the applicant and their household. The earlier the local authority can get an understanding of these issues, the better the chance of success in preventing and alleviating homelessness. This should be particularly beneficial to people who face additional barriers, inequalities or marginalisation. We also welcome the requirement to include an assessment of the support needed by the applicant regarding communication. During our engagement with experts by experience, challenges with communication were a common theme. We also welcome the specific reference to seeking the views of the applicant and having regard for

these views. While this approach is evident in much of the existing good practice across Wales, it should be central to the process to ensure that people get the right support that meets their needs, as quickly as possible.

We also welcome the duty to prepare and maintain a Prevention, Support and Accommodation Plans (PSAPs) and the explicit recognition of the importance of prevention and support, alongside the retention or provision of accommodation. We are particularly pleased to note that this section of the Bill requires the local authority to seek the views of applicant and inquire as to the outcomes they wish to achieve. We also welcome the need for the local authority to consider how to ensure that they communicate with the applicant in a way that is accessible to them. As mentioned above, communication from local authorities was a common theme in our engagement with experts by experience, and we welcome any moves to improve how this is undertaken.

### **Right to request a review (5)**

There are a number of references to an applicant's right to review decisions within the Bill and we welcome this wholeheartedly. We know that local authorities try to ensure that their approaches to decisions are person-centred, but there are occasions where important information is missed or mis-interpreted, particularly when people are experiencing a crisis and the homelessness system is under so much pressure. The ability for a person to ask for a review of their PSAP, the suitability of accommodation being offered to them, the ending of the duty, and the referral of their case under local connection rules, is to be welcomed.

However, it is unclear in the Bill whether the applicant has the ability to request a review of the reasonable steps taken by the local authority in relation to the prevention duty. We know that these reasonable steps can be critical in preventing homelessness and ensuring that the person does not experience the trauma of homelessness, while also reducing the burden on local authorities to find accommodation. However, the feedback from experts by experience indicated that reasonable steps can vary considerably, and therefore we believe a right to request a review of the reasonable steps taken by the local authority would be a useful addition.

### **Additional housing options (7, 19)**

In most circumstances, an offer of suitable social or private rented accommodation will be the most appropriate and sustainable way to end the duty to secure accommodation, and this should continue to be the case regardless of this Bill.

However, there may be circumstances in which additional housing options, such as remaining in the family home (where safe to do so) or supported lodgings, could provide a positive housing solution for people. This could ensure that people have a safe and secure place to call home, reducing or avoiding time spent in temporary accommodation. It is important, however, that there are safeguards to prevent this from being used inappropriately. We are wary that significant pressure on temporary accommodation, combined with the short supply of affordable, permanent accommodation, could lead to pressure to accept alternative housing solutions that may appear reasonable, but are not suitable when all factors are considered.

We therefore strongly support the safeguards that have been included in section 7 and section 19, including the need to get the person's agreement, as well as considering whether the accommodation is suitable and likely to be available for twelve months. We also welcome the requirement to keep in touch with people for a period after they have accepted the accommodation to ensure they are not experiencing or at risk of homelessness. Guidance will be important to ensure that implementation is in line with the intention of this legislation, and we support the calls for the provision of independent advice for people who are considering alternative housing options under this part of the Bill.

## Abolition of priority need (9)

*“People slip through the net.” (Expert by experience)*

*“I feel priority groups should be removed as it’s unfair – everyone who is homeless or at risk of homelessness is a priority.” (Expert by experience)*

*“Everyone deserves a decent roof over their heads.” (Expert by experience)*

*“What is the difference? If someone is homeless, they should have the same support.” (Expert by experience)*

*“[It feels like they are saying] You’re a young fit, healthy, male - you’re suitable for the streets.” (Expert by experience)*

*“Not every case fits into the existing priority need categories. [...] The priority need system allows many to become more vulnerable and to slip through the net when left without support at a time of great need or potential danger.” (Frontline worker)*

*“Some people with mental health are not confident enough in seeking medical support and this has affected the homeless process for people I have supported as they have no official diagnosis therefore don’t become a priority.” (Frontline worker)*

*“Whether single people or families, both need help if they are facing homelessness, we can’t just tick boxes to say that some people come first.” (Frontline worker)*

We strongly support the proposal to abolish priority need. This is a system that shuts people out of the system and stops them getting the help they need. Over the years we have heard from countless experts by experience and frontline workers who have described how this test is applied inconsistently, the subjective decisions taken about vulnerability, the ill-informed judgements about the severity of people’s mental health, and how too many people have slipped through the net, despite having multiple vulnerabilities.

The use of priority need was paused during the pandemic and many local authorities have ceased to use this test since. In fact, in 2024/25 there were only 240 priority need [judgements](#) recorded by local authorities in Wales, with 43% of these coming from a single authority and just eight local authorities recorded as utilising this test. This represents only 1.8% of the 13,287 people who were deemed homeless and eligible for help in 2024/25. Given the evidence we received, the Expert Review Panel reached a consensus that abolishing priority need would not represent a major change in approach for local authorities, and most importantly, was the right approach to take.

## Abolition of intentionality (10)

*“I was judged to have been intentionally homeless because I had left my home due to the abuse, and refused refuge due to my son’s health issues. How can you say I’m intentionally homeless, when I got two buses to get here and I’ve waited for two hours? There was no empathy. I was so frustrated.” (Expert by experience)*

*I got out of jail but the council told me I was intentionally homeless. They said ‘it’s your fault’ because I was kicked out of a hostel. But this was because someone hit me.” (Expert by experience)*

*“I was told I was intentionally homeless – but I was escaping violence.” (Expert by experience)*

*“I went through 13 years of hell because of intentionality. I was beat up, stamped on [on the streets].” (Expert by experience)*

*“I think this should be removed because there is always a reason why someone doesn’t pay rent, when someone gets evicted it’s not always their fault, some people need extra support when they get a tenancy but they don’t get it.” (Expert by experience)*

*“I was made intentionally homeless once because I stayed with my sister because my neighbour took drugs. This upset me a lot and I did not know what to do.” (Expert by experience)*

*"It should be removed, there may be a good reason why they had to leave the property they were living in." (Expert by experience)*

*"Intentionality is dressed up judgement." (Expert by experience)*

*"It wasn't a light decision I came up with one morning." (Expert by experience)*

*"I'm being punished for leaving an area that wasn't suitable for me where I'm not safe." (Expert by experience)*

*"It might be deemed as poor decisions, but it's a trauma response." (Frontline worker)*

*"Intentionality can often completely disregard a person's mental health need, certain responses to trauma, a learning difficulty, or their lack of ability to do the right thing. The law can fail to realise that it exists to protect and support vulnerable people in vulnerable situations." (Frontline worker)*

*"With a case like that you have to look at what else is going on, it might have been a decision between rent, or food in their children's mouths. There are very few who would intentionally make themselves homeless. People need help to understand the situation." (Frontline worker)*

*"There needs to be more understanding of why people might end up making themselves homeless, most not know the consequences, need to look at it more compassionately, people need to be listened to and understood, there are reasons why people are in this situation and they need help." (Frontline worker)*

We wholeheartedly, and without hesitation, support the proposal to abolish the intentionality test. For too long we have seen the immediate and long-term damage it does to people's lives, as illustrated by the comments above from experts by experience and frontline workers. This test receives international criticism because it excludes people from getting the help they need, and forces people onto the streets. It is an outdated element of our current legislation, that could not be further from the trauma-informed approaches promoted by the Welsh Government and many other public bodies over the last decade. The health impacts of being homeless, particularly for people on the streets, are widely known, with a higher prevalence of a range of health conditions and a life expectancy or approximately 30 years less than the general population. The human costs are huge and the impact on other public services, such as health and the criminal justice system, should not be overlooked.

Our conversations with both experts by experience and frontline workers exposed the huge problems with the assumption that a person has deliberately made themselves homeless. So often this is a symptom of an unmet support need, unsuitable accommodation, a call for help, fear of abuse, exploitation or criminal activity, and in some cases, people genuinely thinking they are doing the best thing to avoid falling into debt. The threat and use of intentionality should not be the answer to these challenges, particularly as it drives people onto the streets and into unsafe environments. Instead, we should be considering what has caused someone to become homeless, and how to best provide support to alleviate it now and avoid it in the future.

in 2024/25 there were only 87 intentionality [judgements](#) recorded by local authorities in Wales, with just nine local authorities recorded as utilising this test. This represents 0.7% of the 13,287 people who were deemed homeless and eligible for help in 2024/25.

While the Expert Review Panel agreed that intentionality should be abolished, we are aware that some local authorities are opposing its removal. During the panel's discussions, concerns with abolishing intentionality were primarily related to people 'manipulating' the social housing allocation system and frontline staff facing threats and violence. While we agree that frontline staff must be safe in the workplace, intentionality is not the appropriate mechanism to achieve this. Following the White Paper consultation, this issue was discussed further by a reconvened Expert Review Panel. The panel maintained its position that intentionality should be abolished, but agreed that the Welsh Government could explore how to provide protection from violence within another part of the

legislation. This has been addressed in section 36 of the Bill, while the concern relating to ‘manipulation’ of the social housing allocation system has been addressed in section 20 of the Bill.

63. *The abolition of the intentionality test will not come without challenge, and we recognise the concerns of local authorities. The Bill contains a range of additional provisions (including the deliberate manipulation test, the violent and threatening behaviour test and provision for non-response to repeated attempts to make contact), which aim to address the feedback raised. (Homelessness and Social Housing Allocation (Wales) Bill Explanatory Memorandum)*

In light of these proposals, which address local authority concerns, there is no good reason to retain intentionality.

## Local connection (11)

*“Many people want to move out of area as they have connections to drug use or violence in their local area. The current law does not take this into consideration and people are trapped in a cycle of homelessness due to being unable to move away from their past if they don't have local connection outside their area. It's a ridiculous rule that prevents people from getting the help they need.” (Expert by experience)*

*“How can cycles be broken if you can't move somewhere else?” (Expert by experience)*

*“Sometimes you need to leave an area to be safe.” (Expert by experience)*

*“You have to go back to where you're running away from.” (Expert by experience)*

*“Some of us don't want to come back to our home county. Because I was born in [county] I have to come back here. I don't go into town much, there's days when I'm really nervous. I asked if I could go to Bangor or Wrexham but I was told no, you have to go to your own area. I'm nervous about my safety. I want to go somewhere where no-one knows me and get on with my life.” (Expert by experience)*

*“I have worked with a number of vulnerable clients who have wanted to move out of the borough due to risks from others, concerns about drug/alcohol relapse etc, but due to no local connections outside of their current borough, they have not been able to move to a more desirable area.” (Frontline worker)*

During our engagement with experts by experience and frontline workers, we heard numerous examples of people who faced disadvantages as a result of local connection rules. This was particularly relevant to some groups of the population, including LGBTQ young people, veterans, care experienced people, people leaving prison, people who had experienced abuse or exploitation, and people who were trying to recover from addiction or prevent further interaction with the criminal justice system.

During the Expert Review Panel's deliberations, local authorities felt very strongly about the need to retain local connection, due to fears about some areas becoming overwhelmed by presentations if it was removed. While we continue to be concerned about the impact of local connection, especially on people in the groups listed above, this was an area of the legislation that we were willing to compromise on, in order for the Expert Review Panel to reach consensus across all of the recommendations. We understood and sympathised with the concerns raised by our local government colleagues and therefore agreed that local connection would remain, but exemptions or special cases would be considered for groups who were particularly disadvantaged by this test.

We are disappointed that additional exemptions are not included in the Bill. We understand that making law on this issue is complex, particularly with cross-border considerations, but we would have preferred to see greater flexibility for the groups we have identified above. We do, however, welcome the ability for the Welsh Government to make regulations to exempt other groups in the future. Our other concern about this section of the Bill is that it may exclude people without a local connection from receiving help from homelessness services. We would like to see this addressed before the Bill is passed, either through an amendment or statutory guidance.

## Help to retain suitable accommodation (18)

*“Support in community is crucial.” (Expert by experience)*

*“Long term support needed.” (Expert by experience)*

*“Permanent accommodation is the beginning not the end.” (Expert by experience)*

*“Would still want to access support after moving into settled accommodation.” (Expert by experience)*

It is widely recognised that having a place to call home is just one part of preventing or alleviating homelessness. Support services have a critical role to play in ensuring that a person does not lose their existing home, or does not experience repeat homelessness once they find a new home.

[Research](#) conducted by Cardiff Metropolitan University outlined the human and financial benefits of housing support services, with improved outcomes for people receiving support and a net benefit to public services such as health, social care and criminal justice of £1.40 for every £1 invested.

We therefore warmly welcome the proposed duty to help retain suitable accommodation and believe this to be an element of the Bill that has widespread support from all stakeholders. In particular, the provision of support is a key factor in encouraging housing associations to allocate more of their properties to people within the homelessness system. While many people do not require any support, the legal duty to provide support to people with an assessed need will be vital in giving social landlords the confidence to do this.

The guidance that accompanies this part of the legislation will be important, as will the need to ensure that local authorities have sufficient resources to commission and provide support to applicants. The only element that causes us concern is that the support will be restricted to a period of twelve months. Some people may require longer term support and we would like local authorities to have the discretion to extend the period of support.

## Unacceptable behaviour that brings duties to an end (20)

**Threatening and violent behaviour:** As the organisation that runs the Frontline Network Wales, we frequently hear about the risks and challenges facing frontline homelessness and housing support staff in Wales. Their jobs expose them to a huge amount of vicarious and first-hand trauma, and they have reported increased complexity of needs within services over the last few years. These workers must feel safe when undertaking their roles and should not be subject to the threats or reality of violence in the workplace.

We therefore support the principle of protecting staff from “threatening and violent behaviour”. However, we want to emphasise the importance of ensuring the guidance sets out how local authorities should approach this decision, and the need to take a trauma-informed approach. We know that many people in the homelessness system have experienced significant trauma, often since childhood, and this can have a significant impact on their emotional regulation and ability to trust people and services. The guidance should carefully consider the thresholds that are applied to this decision, the training and seniority of staff taking and signing off this decision, the steps that are taken before the decision, what unmet support needs have contributed to violent or threatening behaviour, and whether alternative routes to meeting unmet support needs (particularly via the provision of support services and co-operation / case coordination by other agencies) could result in a more positive outcome for the person and the authority. We must ensure that people who do not pose threat to staff are not shut out of a system that is supposed to help them.

**Destruction or serious damage to property:** We have a number of concerns about the clause relating to the destruction or serious damage to property. As outlined in the previous paragraph, traumatic experiences, including adverse childhood experiences, are very common in the among the homeless population and can have a significant impact on emotional regulation. While we do not condone the damage of property, we know this can occur when a person is traumatised, feels

under threat, is having a mental health crisis, or is experiencing an adverse reaction to substances. We are concerned that this could lead to someone losing their ability to access accommodation and help, further traumatising them and reducing their ability to engage positively with support services. Secondly, we are concerned that this could disproportionately affect people experiencing domestic abuse, as it is not uncommon for perpetrators to cause damage to belongings and property as part of their abusive behaviour. It would be unacceptable for a victim / survivor of domestic abuse to be excluded from the homelessness system due to the actions of their abuser. While we would not expect a local authority to do this intentionally, we know that domestic abuse can be complex, is not always disclosed, and can be hidden due to fear and coercion.

**Impact of ending the duty:** In all of the circumstances in which the duty can be ended, serious thought should be given to the impact of this decision. Ending a duty in its entirety means that the person will not be able to access any accommodation or support within the statutory homelessness system, which is a significant punishment. While protecting staff should be of upmost importance, the guidance in relation to the approach taken by local authorities, considerations of trauma and abuse, and the interpretation of 'special circumstances' and 'reasonable excuses' should be carefully considered in the context of a trauma-informed approach.

Another key consideration is how long a person would be excluded from the statutory homelessness system, as this is not clear in the legislation. The guidance should set out how people can request a re-assessment and be able to demonstrate that they no longer pose a threat to frontline staff. Again, ensuring that people have access to the support they need to overcome challenges and deal with trauma will be critical. Ending a duty does not make the person or their needs disappear, but it does make it more likely that people will be on the streets and in need of more acute, emergency services from a range of public services in the future.

## The role of public services

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### Duty to ask and act (21)

*"One of the biggest things that could happen is for all services to play their part." (Expert by experience)*

*"Help. Understand, support, not assume." (Expert by experience)*

*"Other services could have got involved sooner." (Expert by experience)*

*"In my situation, I feel like social services could have done more to prevent me from being homeless. They knew what problems I had going on at home and how much it all was affecting me I had to live between friends because I didn't want to go home due to what I was going through but social services forced me to go back home. If social services had done something sooner rather than later, I think I would be in a different position now." (Expert by experience)*

*"I was engaged with the GP and substance misuse services before I became homeless. They were fully aware of my circumstances but didn't do anything to prevent it. They waited for it to happen. I could have been referred on for help [to prevent homelessness]." (Expert by experience)*

*"If there is a legal duty, it can hopefully play a really good part, even if it's just statutory services. We're willing to go for anything that works more positively for the individuals we are supporting." (Frontline worker)*

*"Being connected with those services can make such a difference. It's so important we work together. We're all here for the good of the person, we need to remember that." (Frontline worker)*

*"It's a headache on times when we feel we up against closed doors, fighting against mental health and housing needs, with the trauma the person has gone, is going through." (Frontline worker)*

*"It is really hard to get interaction with them, they don't want to take people on, they do not accept that these people need help. Maybe this is due to a lack of staff or resources?" (Frontline worker)*

It is widely accepted that homelessness is not simply a housing issue, and requires action from a wide range of public services. The Homelessness and Social Housing Allocation (Wales) Bill marks a significant step in ensuring that a wider range of public services play their part, rather than relying predominantly on local housing authorities. We strongly welcome the ‘ask and act’ duty within the Bill and believe this will be key to earlier intervention and improved prevention of homelessness. If a wider range of public bodies are able to identify people experiencing or at risk of homelessness, and act upon it, then far fewer people should become homeless. This should reduce the pressure on local authority homelessness teams and reduce the demand for costly, and often unsuitable, temporary accommodation. This, in our view, is one of the most important parts of the Bill.

However, we have a small concern that the legislation, as currently drafted, does not include a specific requirement to inquire whether a person is experiencing or at risk of homelessness, which we view as a critical part of the ‘ask’ part of this duty. It appears as though this step is assumed, rather than spelled out in the text of the Bill. We are worried that this could result in services not being proactive in inquiring about homelessness, which means that the other elements of this part of the Bill (i.e. to act) will only happen if it is very obvious that the person is homeless or at risk of homelessness. We believe this can be resolved with a small amendment to the legislation, or at the very least a clear instruction within statutory guidance to address our concern.

Implementation will require training for the public services listed in the Bill, and resources to ensure that it is effective, but this section of the Bill is a huge step towards ensuring that a wide range of services play their part in preventing homelessness.

## Specified public authorities (21)

### Co-operation (32)

*“Siloed work – each service acting separately. I would have wanted my notes shared with other agencies. There is a lack of joining up the dots.” (Expert by experience)*

*“Substance misuse services need to work better with housing.” (Expert by experience)*

*“Mental health support in prison is useful but waiting lists in the community are really long. By the time you get to see them your mental health has deteriorated too much.” (Expert by experience)*

We are extremely pleased to see both devolved and non-devolved public services listed in section 21 and section 32 of the Bill, and welcome the positive work between the Welsh and UK Governments to agree that key parts of the criminal justice system are part of this list, as well as Jobcentre Plus and the Secretary of State for Defence. The ‘ask and act’ duty, alongside the expanded list of bodies subject to the co-operation duty, will significantly improve the approach to preventing and alleviating homelessness in Wales, and we strongly support these elements of the Bill.

However, there are some key services and agencies missing from the lists of public bodies in section 21 and section 32.

**Primary care:** While we are delighted that health is included in the list of public bodies, we are very disappointed that primary care is excluded. We appreciate that general practice is a contracted service and therefore operates differently to most parts of the NHS in Wales. However, primary care is the part of the health system that people most frequently come into contact with, and therefore provides the biggest opportunity for the early identification and prevention of homelessness. We are not convinced that these concerns can be addressed by assurances about plans for the GP contracting process, and instead strongly believe that primary care should be included in the list of bodies subject to the ‘ask and act’ and co-operation duties.

**Education:** We are extremely disappointed that education is not included in the list of public bodies subject to the ‘ask and act’ and co-operation duties, despite this being in the Expert Review Panel’s recommendations. While we do not hold a particular view on which organisation – whether that be schools and colleges, or the local education authority – should be listed, we strongly believe that education should be included in some form. We understand the Welsh Government believes that existing legal requirements related to safeguarding and the welfare of children are sufficient, but we are concerned that these are not specific to homelessness. We also appreciate that there is very good practice taking place in some schools, but as with all good practice, this is likely to be variable and often reliant on passionate and committed individuals, rather than being systemic. We therefore believe that a nationally applied duty would ensure that this issue is given the prominence and importance in all parts of Wales.

**Police:** The police are one of the key agencies that interact with people experiencing and at risk of homelessness, as well as with homelessness and housing support projects across Wales. We would therefore urge the Welsh and UK Governments to reach an agreement for the inclusion of police in the list of public bodies in section 21 and section 32.

**Home Office:** There continues to be a significant risk of homelessness for people who are asylum seekers and refugees, particularly given the recent shortening of the notice period to leave Home Office accommodation when someone has been granted refugee status. We therefore believe it would be extremely helpful for the Home Office to be on the list of public services subject to the ‘ask and act’ and co-operation duties.

## Targeted prevention

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### Young people leaving care (23, 24)

| *“Young people are being bounced between social services and housing.” (Frontline worker)*

Care experienced people are at a far higher risk of homelessness compared to the general population and we strongly support all of the elements of the Bill that seek to address this inequality. During our engagement with experts by experience we heard from several people who felt that they had been ‘bounced’ between homelessness services and children’s services, with neither addressing their housing needs. We therefore warmly welcome the clarification offered by this part of the Bill that social services should take the lead in ensuring young people leaving care have a safe place to call home. We also welcome the duty on social services and housing to develop joint protocols, with the hope that this will ensure that young care-experienced people get the help and support they need to access and maintain a safe and secure home.

### Persons in particular need of support (25)

| *“GPs should have the right to intervene with a support package prior to evictions using a multi-agency approach such as is used with safeguarding. This would effectively raise a safeguarding issue for an individual at risk of homelessness, and in an ideal world would trigger a response from a future ‘Homeless Prevention & Mental Health Taskforce’ who could then step in on behalf of the patient.” (Expert by experience)*

| *“They didn’t make any plans for mental health or substance use services on release.” (Expert by experience)*

| *“I’ve got instances where it has worked really well, where agencies have come together and formed wrap around support – mental health, substance misuse services, probation - and it has worked really well. But on the other hand, it depends who is working within those organisations. Some individuals who are multi-agency oriented, where people understand importance of working together. Then come up against others who don’t work together as well.” (Frontline worker)*

*“Recently had an individual who was very, very complex. She was on the street, put back into prison, but there was contact within prison, probation, and the council, so when she was released we were there to go and pick her up to do wrap around support immediately which worked so well. It was amazing and what it should look like. Another time she went to prison but was released without them telling anyone, with nothing in place, no input from services, so it broke down very quickly.” (Frontline worker)*

As illustrated by the quotes above, there was huge support among experts by experience and frontline workers for better partnership working between agencies when people had multiple and often complex support needs, or were in touch with a number of different public services. There was a strong sense that agencies are often poor at communicating with each other, and this led to support being uncoordinated and people slipping through the net. Experts by experience and frontline workers also felt that this resulted in people having to repeat traumatic experiences unnecessarily, and missed opportunities to provide joined-up support and address people’s needs holistically.

We were given many examples of where housing or homelessness services had asked other public services to step in to avoid a crisis from developing, but didn’t get the response they needed. Sometimes this was due to capacity and sometimes it was because the housing or homelessness professional wasn’t taken seriously, despite them seeing people daily and being able to spot the signs of a crisis. On some occasions this led to people not getting the help they need and being at far greater risk of homelessness and/or hospitalisation.

However, there are some fantastic examples of partnership working in some parts of Wales, where people’s needs are met holistically and crises are avoided. However, this is too often dependent on individuals who are passionate and dedicated to partnership working, and is too rarely built into the system. We therefore strongly support this section of the Bill and its aims to better coordinate support for people who need the support of multiple agencies.

Our only feedback on this particular section of the Bill is that the emphasis is on the local housing authority to ‘make arrangements to promote co-operation’ including the development of a protocol for handling cases of people in particular need of other support services. While it may be entirely appropriate for the local housing authority to be the lead agency, we question whether this section of the Bill should compel other public services to respond and contribute positively to the coordination and development of a protocol for people in particular need of support.

## **People in the secure estate (26, 27)**

*“On the day of release, you don’t know where I’m going to be.” (Expert by experience)*

*“Coming out of prison – so desperate for help but felt like doors were being slammed in my face.” (Expert by experience)*

*“Prison told me everything was in order, that I’d have somewhere to go. I had an end date for my BASS hostel stay. But the day before no one knows what is happening. Couldn’t get hold of the council or probation. No one knew what was happening. Do I pack, do I not? Then the BASS accommodation got extended.” (Expert by experience)*

*“When I got out of prison the local authority gave me a tent and I lived in it for three weeks. It’s stressful getting out of prison as it is. I felt vulnerable, it’s embarrassing. I should have a roof over my head. I’m worried the same thing is going to happen when I get released this time. They are setting you up to fail. Should be able to register in advance with the council [for housing].” (Expert by experience)*

*“Lost my property when I went to prison. My property wasn’t stored properly, I lost photos of my children and the only photo I had of my child who died.” (Expert by experience)*

*“I had half an hour to pack. I took a suitcase and my mum’s ashes. I lost everything else. There’s no compassion. Your belongings are your life. Without them you feel like just another number.” (Expert by experience)*

*"I was only in jail a year and would have liked to put my property in storage. I lost my cooker, fridge, everything. When I came out of all I had nothing." (Expert by experience)*

We know that people in the criminal justice system are disproportionately affected by homelessness, with many people entering prison without a home, and others losing their home during their sentence. We undertook two visits to a prison and two visits to probation support services during our engagement with experts by experience for the Expert Review Panel, and accommodation was the most pressing issue raised by the people we spoke to and the professionals working with them.

We therefore welcome the clarification provided in this section of the Bill that information, advice and assistance should be provided to people within the secure estate, not just people leaving the secure estate. We also welcome the amendment related to the protection of people's belongings during their time in prison. As illustrated by the quotes above, we spoke to several people who lost incredibly important personal belongings when they entered prison, which had a significant impact on their wellbeing, as well as people who felt that their loss of belongings set them up to fail when they were released back into the community.

It is also worth highlighting that other parts of the Bill will benefit people in the secure estate, namely the increase in the prevention period to six months, the duty to ask and act, the expanded list of organisations subject to the co-operation duty, and section 25 (persons in particular need of support). The Welsh Government's Post Custody Accommodation Working Group, involving stakeholders from devolved and non-devolved bodies, is also focused at delivering improvements to partnership working and practice in this area.

### **Definition of abuse (28)**

We warmly welcome the expansion of definition of domestic abuse to include controlling or coercive behaviour, economic and psychological abuse. We also welcome specific references to Modern Slavery Act 2015 and Protection from Harassment Act 1997 to ensure that people who experience exploitation, stalking and harassment are able to access the help they need.

### **Duty to seek the views of homeless persons (29)**

As the organisation that led the work to engage with over three hundred experts by experience in the development of the Expert Review Panel's report and recommendations, we are delighted to see section 29 in the Bill, which places duties on both the Welsh Government and local government to seek the views of people with lived experience.

### **Temporary accommodation (31)**

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*"There were no cooking facilities in TA, how was I going to feed the kids?" (Expert by experience)*

*"We shared one bedroom, four of us, youngest was only 9 months." (Expert by experience)*

*"Placed into accommodation with no support, no food, more stress added as don't know how long to stay there. Other clients staying caused more issues." (Expert by experience)*

*"Out of borough - no cooking & washing clothes facilities no respect no privacy nowhere to store my belongings after losing my last tenancy no support no empathy didn't know where I was going until the day before no time for making arrangements to move." (Expert by experience)*

*"Doesn't feel safe. I don't feel stable (like I can relax). Can be noisy or chaotic with other tenants." (Expert by experience)*

*"[There's] no kitchen, no laundry and people are there for a long time, 18 months unable to cook and wash laundry on site, a client with a Learning Disability, it has set him back a lot." (Frontline worker)*

*"Travel lodge, all in one room, then they were evicted [from the hotel] due to the rugby, moved to another travel lodge, one room, no fridge, no cooking facilities." (Frontline worker)*

It was clear from our engagement with experts by experience that people's experiences of temporary accommodation can be very poor and it is often unsuitable for their needs. While this is a symptom of the current crisis in our housing market, and local authorities are working extremely hard to improve the quality of temporary accommodation and increase the supply of permanent homes, this will continue to be a challenge for the foreseeable future. We therefore welcome the duty on the Welsh Government to provide regular reports on the use and condition of temporary accommodation. The Expert Review Panel recommended a period of three years, yet the Bill requires the report to be produced every five years. We would have preferred a shorter period to ensure it is scrutinised more frequently, but we also appreciate the Welsh Government's desire to align these reports with other housing-related assessment, planning and reporting timeframes.

## Access to social housing

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### Cooperation between social landlords and local housing authorities (33)

*"To find a permanent place to call home is everything." (Expert by experience)*

*"People need security in their lives." (Expert by experience)*

*"I'm 20 years old and I've spent a year with two kids in a hostel. That's a 20th of my life." (Expert by experience)*

*"Temporary accommodation is like a prison but you don't know when you're going to be released." (Expert by experience)*

*"Takes far too long to be housed, more social housing needed, more support for vulnerable people." (Expert by experience)*

*"My clients are now being told to go private (when the PRS is also unaffordable and saturated) as the waiting list is 2+ years. We also have people in hostels/supported accommodation who have been there for over two years and still without any hope of being offered housing." (Frontline worker)*

We welcome this section of the Bill, as the majority of experts by experience described how difficult it has been to access social housing, often resulting in very lengthy stays in temporary accommodation. While building a significant number of new social homes should continue to be a priority, the allocation of existing and new social homes to meet the needs of people experiencing homelessness is just as important. The recent [Homeless Monitor Wales](#), published by Crisis, also shows that increasing social housing allocations could make the biggest difference to homelessness in Wales.

We want to make it clear that many social landlords are already doing excellent work in this area and contributing a huge amount to the prevention and alleviation of homelessness. They are allocating a high proportion of their properties to people experiencing homelessness, delivering trauma-informed, person-centred support to people who need it, and providing properties for supported housing and Housing First.

However, we know that this is not the case in all parts of Wales. While the data on allocations is poor and should be improved, where it is available, it often highlights a huge variation in practice across different social landlords. The [research](#) commissioned by the Community Housing Cymru, the Welsh Government and the Welsh Local Government Association as part of the Expert Review Panel's work showed that allocation rates varied between 23% and 60%.

In an ideal world, this element of the legislation would not need to be utilised. In fact, we do not expect it to be used very often, as we know that most social landlords are making a huge contribution already and have excellent relationships with local authorities. However, we believe it is a useful tool for local authorities to be able to call on, if they are not getting a reasonable response when trying to secure a home for someone experiencing homelessness.

### Qualifying persons for allocation of social housing (35)

While we understand the rationale behind this section of the Bill, we are concerned that it could lead to some people being taken off the social housing waiting list when they have a genuine need for social housing. It provides an opportunity for people to slip through the net, and we know that this can often disadvantage people who are marginalised and feel less confident to challenge the decisions of public services. An alternative approach to better understanding urgent social housing need could be analysis of the different priority groups or banding within a social housing waiting list, rather than removing people from it. We are also concerned that this provision opens up the possibility for particular groups to be discriminated against in the provision of social housing.

### Deliberate manipulation (36)

We are uncomfortable with the deliberate manipulation test, but we accept this as one of the compromises associated with the worries that local authorities have about the abolition of intentionality. We are concerned about how the deliberate manipulation test will impact people with experience of trauma, and would argue that people who are perceived to have made themselves homeless may well be in distress and/or have an unmet support need.

However, we view the deliberate manipulation test at the allocations stage as a preferable option to intentionality, which shuts people out of the statutory homelessness system, stops them from getting the help they need and often forces people onto the streets.

We urge the committee to seek clarification about how this will operate in practice, particularly with regards to whether this will shut people out of social housing indefinitely, or for a specified period of time. We also believe that clarity is required about whether this only affects the preference associated with homelessness, and does not affect the reasonable preference associated with other categories, such as medical or welfare needs (or the proposed new reasonable preference category for people leaving care). Finally, the guidance should ensure that a trauma-informed approach is taken to the decision-making process and unmet support needs are identified.

### Preference for young people leaving care (37)

We strongly support this section of the Bill, given the increased risk of homelessness and lack of support systems associated with people leaving care. We would have preferred this to apply to care-experienced people for the whole of their lives, as they often face life-long disadvantage, however we are happy to support this proposal in its current form.

### Housing registers (38)

*“Nobody seems to know how the allocations work [...]. It’s a lucky dip.” (Expert by experience)*

*“There’s a lack of transparency on what accommodation is being offered.” (Expert by experience)*

We strongly support this section of the Bill. While the majority of local authority areas in Wales have common housing registers, we heard evidence that people in the other three areas face unnecessary complexity and a lack of transparency when they are trying to navigate the social housing system. We therefore welcome the move to ensure all twenty-two areas adopt this approach.

We also welcome the requirement for accessible housing registers, as we heard from a number of experts by experience who had particular access requirements, and found themselves waiting a long time for social housing, as the local authority was unable to identify appropriate provision in the local area.

Ein cyf/Our ref JH/PO/504/25

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15 October 2025

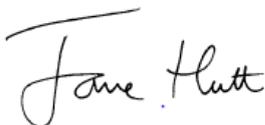
Dear John,

Thank you for the question you asked in the Senedd on Wednesday 24<sup>th</sup> September regarding improving the provision of Gypsy and Traveller sites in Wales.

In my response I promised to write to you, and members of the Local Government Housing Committee, with an update on progress against the recommendations made by the committee. Please see that update attached.

I hope this information is helpful in updating the Committee's recommendations.

Yours sincerely,



**Jane Hutt AS/MS**

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

Cabinet Secretary for Social Justice, Trefnydd and Chief Whip

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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.

**Annex A – Welsh Government Updates to Local Government  
Housing Recommendations from February 2025:**

<u>Recommendations</u>	<u>Welsh Government Update</u>
<p><b>Recommendation 1:</b></p> <p>The Welsh Government provides an update on progress made against recommendations in our 2022 report on the provision of sites for Gypsy, Roma and Travellers</p> <p><b>Response: Accepted</b></p>	<p>An update on progress made against the 21 recommendations made by the Local Government and Housing Committee in 2022 can be found as part of <b>Annex B.</b></p>

<p><b>Recommendation 2</b></p> <p>The Welsh Government should provide the Committee with the latest data on the number of transit pitches in Wales and update us on how it intends to increase transitory provision in Wales including how it will ensure that the needs of Gypsies and Travellers are met.</p> <p><b>Response: Accepted</b></p>	<p>There is currently no transit site provision in Wales.</p> <p>One of the Anti-racist Wales Action Plan (ArWAP) actions is to engage with Gypsy, Roma and Traveller community members to identify the need to provide appropriate transit provision.</p> <p>Officials met with all local authorities in January 2024 to discuss taking a regional approach to the provision of transit sites and collection of associated data. The overwhelming feedback was that a nationwide evidence base would need to be commissioned to understand movement of Gypsies and Travellers both in and out of Wales and in and out of local authority boundaries.</p> <p>Welsh Government awarded a contract to Gypsies and Travellers Wales (GTW) to build a national evidence base about the need for transit sites, in collaboration with relevant regional parties and Gypsy and Traveller people. Having this information will help to ensure that transit provision is located appropriately and is accessible to those who need it.</p> <p>This contract will provide an evidence base of the needs of transit provision across Wales, make recommendations for the location of transit provision and provide a suitable model for implementing transit sites.</p> <p>Involving community members in this evidence-based approach is essential to help understanding of the travelling life for families across Wales.</p> <p>Officials will receive a full report in December, after which officials will work with local authorities to discuss plans for transit facilities across Wales.</p>
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<p><b>Recommendation 3</b></p> <p>The Welsh Government should work closely with local authorities and members of the Gypsy and Traveller communities to deliver additional temporary negotiated stopping sites. All negotiated stopping sites in Wales must provide appropriate waste and sanitary services.</p> <p><b>Response: Accepted</b></p>	<p>As part of the transit contract referenced above, the contractor will include discussions and options around negotiated stopping places in tandem with or as an alternative to transit provision. Once we have the final recommendations, we will work with local authorities on the recommendations.</p> <p>Welsh Government provides capital site funding available to local authorities to fund either local authority sites or transit sites. In 2024-25, we extended the eligibility criteria to include the acquisition of land which can be used for new pitches, new sites, transit sites or temporary/negotiated stopping places.</p> <p>In addition, a public consultation on four Welsh Government guidance documents has been completed. One of these, '<i>Managing Unauthorised Encampments in Wales</i>', has been updated to include a three-path approach for local authorities to adopt when engaging with families on encampments.</p> <p>The guidance also supports the development of transit sites and temporary/negotiated stopping places, with a clear emphasis on meeting the family's welfare needs, including the provision of suitable waste management and sanitation facilities.</p>
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<p><b>Recommendation 4</b></p> <p>The Welsh Government sets out how it is monitoring use of the Sites Capital Grant to ensure that funds are being used appropriately and address the needs of Gypsies and Travellers in Wales.</p> <p><b>Response: Accept</b></p>	<p>In 2024-25 Welsh Government made available £3.44m capital funding for local authorities to improve, extend or build new local authority sites, whether residential or transit; and for land acquisition of new sites. The same amount has been made available in 2025-26 financial year.</p> <p>Once funding is awarded, monthly monitoring meetings are held between the Gypsy Roma Traveller grant manager and the local authority to track progress, confirm that agreed works are completed, and ensure that funds are used appropriately to meet the needs of families.</p> <p>Last year, 14 local authorities received capital funding for a variety of site improvements to the value of £1,865 million. These improvements included refurbishment of utility blocks, renovating community buildings, installing electric smart meters, replacing fencing, digital connectivity and improving drainage. So far this year we have approved 14 grants totalling £2.41 million.</p> <p>One example of the positive impact this funding has had is the installation of domestic rate meters at local authority sites in Blaenau Gwent and Merthyr Tydfil. These improvements are welcomed by residents.</p> <p>It is essential that local authorities carry out meaningful consultation with residents to understand their needs before submitting bids for financial support. This is discussed at each Welsh Government assessment panel to ensure engagement and value for money is achieved.</p>
<p><b>Recommendation 5</b></p> <p>The Welsh Government reviews the criteria and application process for the Sites Capital Grant to ensure that it is effectively utilised by local authorities to meet the accommodation needs of Gypsies and Travellers.</p> <p><b>Response: Accept</b></p>	<p>The Sites Capital Grant guidance for 2025-26 was updated earlier this year to place greater emphasis on developing new pitches, ensuring the funding is available to help address the Gypsy and Traveller Accommodation Assessment unmet need across Wales.</p>

<p><b>Recommendation 6</b></p> <p>The Welsh Government should set out how it will work with local authorities to ensure that Gypsy and Traveller site maintenance is undertaken, and how it will tackle local authorities' failure to maintain and improve those sites. As part of this, it should consider how local authorities fund and prioritise Gypsy and Traveller site maintenance.</p> <p><b>Response: Accept</b></p>	<p>The Welsh Government is committed to ensuring that Gypsy and Traveller sites are not only maintained but improved, with dignity, safety and inclusion as non-negotiable principles.</p> <p>Welsh Government works closely with local authorities to promote planned and prioritised site maintenance rather than reactive approaches.</p> <p>To support this, four guidance documents are being reviewed following a public consultation over the Summer. One of these documents, '<i>Managing Gypsy and Traveller Sites in Wales</i>', places stronger emphasis on developing responsive maintenance plans in consultation with residents, with a focus on long-term sustainability.</p> <p>The guidance also highlights the importance of providing clear and accessible channels for families to report issues and seek assistance, empowering communities to actively participate in improving their living conditions.</p> <p>Where funding is sought through the Welsh Government Sites Capital Grant, local authorities must demonstrate meaningful engagement with site residents regarding proposed refurbishments before bids are approved.</p>
<p><b>Recommendation 7</b></p> <p>The Welsh Government should explore how the Sites Capital Grant could be used to support the development of private sites.</p> <p><b>Response: Accept</b></p>	<p>Officials are considering how best to support the development of private sites. Insights from the private planning advice pilot will inform our approach to this recommendation.</p>

<p><b>Recommendation 8</b></p> <p>The Committee Recommends that: The Welsh Government should progress the pilot programme to provide advice to Gypsies and Travellers seeking help to develop private sites as a matter of urgency and update the Committee in three months.</p> <p><b>Response: Accept</b></p>	<p>Buying land that is ultimately deemed unsuitable to turn into a Gypsy and Traveller site as a permanent home for their families has been a recurring problem throughout Wales.</p> <p>The Welsh Government is working in partnership with Travelling Ahead (TGP Cymru) on a pilot project to provide tailored planning advice for families who wish to develop their own site.</p> <p>During this pilot, we aim to better understand the demand of community members in need of planning advice or wanting to set up their own private sites.</p> <p>This 18-month pilot, is a key part of delivering the Anti-racist Wales Action Plan, helping Gypsy, Roma and Traveller families access safe, culturally appropriate accommodation.</p>
<p><b>Recommendation 9</b></p> <p>The Welsh Government should reinstate the Gypsy and Traveller Forum with urgency.</p> <p><b>Response: Accept</b></p>	<p>The Gypsy, Roma and Traveller Stakeholder Group has been reinstated, involving community members, local authorities, third sector organisations and Welsh Government officials.</p> <p>The purpose of these meetings is bringing together Gypsy, Roma and Traveller people with local authorities and voluntary sector organisations, to ensure all our policy work and decisions support the Gypsy, Roma and Traveller communities throughout Wales.</p> <p>This will too ensure that decisions and actions are informed by lived experience and actively support the wellbeing and rights of Gypsy, Roma and Traveller communities throughout Wales.</p> <p>We have awarded a contract to ‘There and Back Again’ to coordinate invitations and reimburse community members for their time and contributions in these meetings.</p> <p>We have already held two meetings of the new Gypsy, Roma and Traveller group in Mid Wales and West Wales. The next meeting is scheduled to take place in South Wales, in October, with North Wales to follow in early 2026.</p>

<p><b>Recommendation 10</b></p> <p>The Committee Recommends that: The Welsh Government should ensure that each local authority has a Gypsy and Traveller Liaison Officer.</p> <p><b>Response: Accept in principle</b></p>	<p>Welsh Government is not responsible for local authority staffing decisions; we can, however, encourage local authorities to appoint designated Gypsy and Traveller Liaison officers. We are aware that 15 local authorities already have designated Gypsy and Traveller posts.</p> <p>It is essential for all local authorities to recognise the importance of having a dedicated Gypsy, Roma, and Traveller Liaison Officer to understand the unique needs of these communities are understood and addressed. This commitment by local authorities will foster an inclusive and supportive environment for everyone.</p> <p>A further ArWAP goal is to ‘Set up community mentor or liaison roles for Gypsy, Roma and Traveller people’. Officials are currently considering options on how to develop this initiative.</p> <p>The community mentor roles will include leadership training to ensure that the mentors are well-equipped to support their communities. This training will be identified and led by the mentors themselves, ensuring it is tailored to the community's needs.</p>
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## Annex B – Welsh Government Updates to Local Government Housing Recommendations from August 2022:

<u>Recommendation</u>	<u>Welsh Government Progress</u>
<p><b>Recommendation 1:</b> The Welsh Government should set out how it intends to support local authorities in the provision of sites that are appropriate for the Gypsy, Roma and Traveller communities, including how it will work with local authorities and communities to mitigate the challenges of finding suitable land for Gypsy, Roma and Traveller site accommodation.</p> <p><b>Response: Accepted</b></p>	<p>Welsh Government has a programme of monitoring with local authorities to review their plans to address unmet need identified in their 2016-2022 Gypsy Traveller Accommodation Assessment. These meetings are at ministerial and official level.</p> <p>Welsh Government provides capital site funding to local authorities to fund either residential sites or transit sites. This can fund projects to refurbish existing accommodation, construct new pitches and improve the sustainability of sites for residents. Last year, we extended the eligibility criteria to include the acquisition of land to try and unblock local authority barriers to the provision of sites.</p> <p>Welsh Government has awarded funding to Travelling Ahead (TGP Cymru) to provide private planning advice to communities over an 18-month period in addition to the existing Advocacy and Advice contract). This will help to mitigate the challenges for finding suitable land for Gypsy, Roma and Traveller communities.</p>
<p><b>Recommendation 2:</b> The Welsh Government should set out how it intends to support Corporate Joint Committees and individual local authorities to develop a network of transitory provision, and how it will monitor and ensure progress.</p> <p><b>Response: Accepted</b></p>	<p>Welsh Government has awarded a contract to Gypsies and Travellers Wales (GTW), to provide research in the form of a national evidence base on the needs of transit across Wales. The research will make recommendations around the location and models of transit.</p> <p>Involving community members in this evidence-based approach will help us to understand the travelling life for families across Wales.</p> <p>Officials will receive a full report in December, after which officials will work with local authorities to discuss plans for transit facilities across Wales.</p>
<p><b>Recommendation 3:</b> The Welsh Government should provide an update on arrangements for an independent and trusted advice service for the Gypsy, Roma and Traveller communities, including funding, resource and skills requirement.</p>	<p>Welsh Government has awarded Travelling Ahead (TGP Cymru) to deliver an Advocacy and Advice service to support Gypsy, Roma and Traveller people following a competitive procurement exercise. This contract will be delivered from September 2024 to August 2027.</p> <p>The objectives of the service are to:</p> <ul style="list-style-type: none"> <li>Facilitate equality of opportunity for Gypsies, Roma and Travellers within Welsh society.</li> </ul>

<p><b>Response: Accepted</b></p>	<ul style="list-style-type: none"> <li>• Provide support and connect with expert advice services to help community members integrate effectively into Welsh society, including advocating changes to public processes where necessary.</li> <li>• Support community cohesion through challenging negative stereotypes and fostering good relations between groups.</li> <li>• Empower communities and individuals to have a voice and make representations on their own behalf on policy development and any other issues raised.</li> <li>• Support the Welsh Government to eliminate racism and discrimination and advance equality of opportunity and to offer solutions to the barriers Gypsy, Roma and Traveller people face.</li> <li>• Work collaboratively with Welsh Government to address systemic issues impacting Gypsy, Roma and Traveller communities and designing solutions to resolve issues reflecting the lived experience of Gypsy, Roma and Traveller people.</li> <li>• Fully engage with evaluation of the contract, both evaluation of the contract's performance as well as evaluation with Gypsy, Roma and Traveller service users.</li> <li>• The service is also available to adults, children and young people in the Gypsy, Roma and Traveller communities in Wales.</li> </ul>
<p><b>Recommendation 4.:</b> The Welsh Government should work with local authorities to ensure that they have the necessary resources to fulfil their duties under the Housing Act.</p> <p><b>Response: Accepted</b></p>	<p>Since all Welsh local authorities Cycle 2 (2016-2022) Gypsy Traveller Accommodation Assessments have been approved, officials have regular monitoring meetings to ensure local authorities are meeting the identified need of their communities. The site Capital Grant is available to help them to do that.</p> <p>Officials work in partnership with local authority Gypsy, Roma and Traveller leads to support their day-to-day interactions with community members, through monitoring of their 2016-2022 GTAA compliance, through the Gypsy, Roma and Traveller stakeholder group and through the case work officials become involved with as highlighted by our Advocacy and Advice contract providers.</p> <p>The policy team has a dedicated Gypsy, Roma and Traveller grant manager to support applications from local authorities. Monitoring meetings are set up between the Gypsy, Roma Traveller grant manager and the local authority to ensure all works are undertaken and completed as agreed and funds are being used appropriately.</p>

<p><b>Recommendation 5:</b> The Welsh Government must ensure that the Housing Act is effective in providing suitable sites for Gypsies, Roma and Travellers. It should therefore set out how it intends to tighten its monitoring of the implementation of the Act.</p> <p><b>Response: Accepted</b></p>	<p>As part of the Gypsy and Traveller Accommodation Assessment (GTAA) process, officials meet regularly with local authorities to hold them to account for their duty in meeting the need they identified in their GTAA.</p> <p>These monitoring arrangements have also included raising awareness of the £3.44 million Capital Sites Grant. As a result, uptake during this financial year has led to £2.4 million being approved so far.</p> <p>Section 104 of the Housing (Wales) Act 2014 gives Welsh Ministers the power to direct the authority to exercise its powers under section 56 of the Mobile Homes (Wales) Act 2013. This is a power Ministers will consider using if it appears that local authorities are not making all reasonable efforts to meet their duties.</p>
<p><b>Recommendation 6:</b> The Welsh Government should provide further information about how and when it will use its powers to ensure that local authorities deliver on their duties under the Housing Act.</p> <p><b>Response: Accepted</b></p>	<p>The escalation process is assessed considering timelines for planning activities by local authorities, ensuring Welsh Government officials are kept informed of any potential risks or delays. If progress is unsatisfactory, officials will request an update from local authorities, emphasising their statutory duty. This ensures accountability and timely resolution of issues.</p> <p>If a resolution cannot be found, officials will brief Ministers, who may wish to escalate this with Council leaders.</p> <p>Section 104 of the Housing (Wales) Act 2014 gives Welsh Ministers the power to direct the authority to exercise its powers under section 56 of the Mobile Homes (Wales) Act 2013. This is a power Ministers will consider using if it appears that local authorities are not making all reasonable efforts to meet their duties.</p>
<p><b>Recommendation 7.</b> The Welsh Government should set out its plans, including timescales, for evaluating the effectiveness of the Anti-racist Wales Action Plan in helping to provide sites for Gypsies, Roma and Travellers.</p> <p><b>Response: Accepted</b></p>	<p>The ArWAP was refreshed in 2024 and includes new actions and timelines with goals and actions to improve outcomes for Gypsy, Roma, and Traveller people.</p> <p>These actions and goals are embedded across numerous policy areas who are responsible for reporting on outcomes for Gypsy, Roma and Traveller people to the ArWAP External Accountability Group (EAG).</p> <p>The External Accountability Group for the ArWAP now includes 2 members with expertise in the Gypsy, Roma and Traveller policy area. Their participation will aid in evaluating the effectiveness of the ArWAP.</p>

<p><b>Recommendation 8.</b></p> <p>The Welsh Government should provide an update on the timescales for the actions in the Anti-racist Wales Action Plan which are already underway.</p> <p><b>Response: Accepted</b></p>	<p>Officials met with Gypsy, Roma and Traveller stakeholders and community members to discuss the ArWAP refresh in May 2024. Feedback from community members were that the actions were too complicated, and the language needed to be simplified.</p> <p>The actions were revised and approved by in December 2024. Following the refresh, one new action was included related to community mentor/liaison roles. The remaining actions were simplified and timescales reviewed. Of the fourteen actions, six have been completed and one is nearing completion. Five goals remain in the policy development stage.</p> <p>An additional action was incorporated to address the availability and readiness of relevant powers under the Housing (Wales) Act 2014, which commits Welsh Government to respond appropriately should circumstances change.</p> <p>Key updates include:</p> <p><u>Gypsy, Roma and Traveller Stakeholder Group:</u></p> <p>One of the most immediate actions was to set up a Gypsy, Roma and Traveller group which has now held two hybrid meetings with community members, stakeholders and local authorities in Aberystwyth and Llanelli. The next meeting is scheduled to take place in South Wales in October, with North Wales to follow in early 2026.</p> <p>This group includes members of the community. ‘There and Back Again’ who has been awarded the contract to coordinate invitations and reimburse community members for their time and contributions.</p> <p><u>Transit:</u></p> <p>The transit research contract has been awarded to Gypsies and Travellers Wales (GTW) to provide research and recommendations around where transit provision would be most suitable across Wales and what this could practically look like. Involving community members in this evidence-based approach will help in understanding the travelling life for families across Wales and prevent social exclusion of this community. Recommendations are due to Welsh Government by December 2025 and will be shared with relevant local authorities following this.</p>
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	<p><u>National Training Programme:</u> Taye Training has been awarded the contract to deliver Gypsy, Roma and Traveller training to all 22 local authorities. This training is currently being co-developed with Gypsy, Roma and Traveller community members, which will be rolled out from April 2026 for three years.</p> <p><u>Private Planning Advice Pilot:</u> An 18-month private planning pilot is being delivered by Travelling Ahead (TGP Cymru) to provide tailored planning advice for families who wish to develop their own site.</p> <p><u>Guidance Documents:</u> Officials have revised four guidance documents pertaining to the Gypsy, Roma and Traveller community and all have now been consulted on.</p> <p>In correlation to the public consultation, third sector organisations were commissioned to engage directly with Gypsy, Roma, and Traveller communities to explore what these guidance documents mean to them.</p> <p>The final guidance has been informed by over 200 interviews from this community, whose voices have been listened to and reflected in the final guidance, which are to be published in the coming months.</p>
<p><b>Recommendation 9:</b> In reviewing the sites guidance, the Welsh Government should explain how it intends to engage with the Gypsy, Roma and Traveller communities to ensure that design and location needs of communities are better reflected in the guidance.</p> <p><b>Response: Accepted</b></p>	<p>In parallel with the public consultation of four Gypsy and Traveller guidance documents for local authorities, my officials awarded contracts with two Gypsy, Roma and Traveller organisations to undertake facilitated engagement work on these draft guidance documents to inform their development.</p> <p>These documents include:</p> <ul style="list-style-type: none"> <li>• Managing Gypsy and Traveller Sites in Wales</li> <li>• Designing Gypsy and Traveller Sites in Wales</li> <li>• Undertaking Gypsy Traveller Accommodation Assessments</li> <li>• Managing Unauthorised Encampments</li> </ul> <p>Due to the high level of community engagement, the forthcoming publication and distribution of these final documents to local authorities is intended to support them in their responsibilities to meet the needs of Gypsy and Traveller communities.</p>

<p><b>Recommendation 10:</b> The Welsh Government should conduct a review of all guidance relating to the provision of sites for Gypsy, Roma and Travellers.</p> <p><b>Response: Accepted</b></p>	<p>All Gypsy and Traveller guidance documents have been reviewed and are currently undergoing final updates, following the public consultation and community engagement.</p> <p>Capital Site Guidance was also reviewed for 2025-26 and will again be revisited for 2026-27.</p>
<p><b>Recommendation 11:</b> The Welsh Government should provide further details on the learning and development support that will be provided to local authority elected members on Gypsy and Traveller communities' culture, needs and strengths. This should include details on: who will receive the training; timescales; how it will be resourced and delivered; and whether it will be a statutory requirement to undertake the training.</p> <p><b>Response: Accepted</b></p>	<p>Taye Training has been awarded the contract to deliver Gypsy, Roma and Traveller training to all 22 Local authorities. This training is currently being co-developed with Gypsy, Roma and Traveller community members.</p> <p>The delivery of these training sessions to all local authorities will commence from April 2026 over a 3-year period. A mock training session will be delivered to community members and Welsh Government in December 2025.</p> <p>Officials will liaise with Taye Training regularly throughout the development stages.</p>
<p><b>Recommendation 12:</b> The Welsh Government should set out how it intends to evaluate the impact of the training for local authority elected members on Gypsy and Traveller communities' culture, needs and strengths.</p> <p><b>Response: Accepted</b></p>	<p>Welsh Government is committed to ensuring that our national training programme for local authority elected members has a real and positive impact on understanding Gypsy and Traveller communities' culture, needs and strengths.</p> <p>The contract with our training provider includes an evaluation of the content and delivery of the programme.</p> <p>This evaluation will include feedback from participants and evidence of improved engagement with Gypsy, Roma and Traveller communities.</p> <p>We will use the findings from this evaluation to inform future policy and practice, and we are committed to sharing these outcomes with stakeholders to ensure transparency and continuous improvement.</p> <p>This work forms part of our wider commitment under the Anti-racist Wales Action Plan.</p>

<p><b>Recommendation 13:</b> The Welsh Government should include community councillors in the commitment in the Anti-racist Wales Action Plan to provide training for local authority elected members on Gypsy and Traveller communities' culture, needs and strengths.</p> <p><b>Response: Accepted</b></p>	<p>Welsh Government's commitment under the Anti-racist Wales Action Plan is to deliver Gypsy, Roma and Traveller cultural awareness training to all local authority elected members and officials across Wales.</p> <p>To help achieve this, Teye Training, working on behalf of the Welsh Government will deliver Gypsy, Roma and Traveller training to all 22 local authorities from April 2026.</p> <p>I wrote to all Elected officials during the summer to provide an update of the work we are doing to support this community.</p> <p>The National Training Programme will be delivered to a range of employees including Elected officials, local authority leaders and any other local authority officials who support this community.</p> <p>I want to ensure that all local authorities in Wales understand the values, needs and lived experiences of Gypsy, Roma and Traveller people, which is why this training will be co-developed and delivered by Gypsy, Roma and Traveller community members.</p>
<p><b>Recommendation 14:</b> The Welsh Government should set out what steps, other than those in the Anti-racist Action Plan, it will take to improve knowledge and understanding of the culture, needs and strengths of Gypsy, Roma and Traveller communities among the wider community.</p> <p><b>Response: Accepted</b></p>	<p>Within the Anti-racist Wales Action Plan, there is an action under the Leadership chapter to set up community mentor or liaison roles for Gypsy, Traveller people.</p> <p>Officials are considering policy options to recruit members from the Gypsy, Roma and Traveller community to step into this community mentor/liaison role. Officials will also be considering mechanisms by which community mentors can be used within local authorities.</p> <p>Addressing the under-representation of Gypsy, Roma, and Traveller voices, mentoring, coaching, and community leadership programmes will increase understanding of racial inequality and strengthen the knowledge and understanding of the culture and needs of the community.</p> <p><u>Winter Fuel</u> Gypsy and Traveller communities, particularly local authority site residents, commonly pay high rates for fuel because their sites are classed as commercial premises. Caravans also have limited options for sustainability and are costly to heat. Some families rely on expensive gas bottles.</p> <p>In 2024-25, Welsh Government provided funding of £500k for a package of winter fuel support to the Gypsy Roma</p>

	<p>Traveller community. This comprised £200k to the Fuel Bank Foundation and £300k to local authorities to support this community during the winter months. Officials are considering a similar model for 2025-26 support.</p>
<p><b>Recommendation 15:</b> The Welsh Government should review whether the existing Gypsy and Traveller Accommodation Assessments process is the most appropriate and effective way of assessing the accommodation needs of Gypsies, Roma and Travellers.</p> <p><b>Response: Accepted</b></p>	<p>The GTAA process was reviewed in 2024.</p> <p>Public consultation of four Gypsy and Traveller guidance documents has taken place, including the 'Undertaking a Gypsy and Traveller Accommodation Assessment' Guidance. Community Engagement has also been carried out to inform the development of these guidance documents to ensure community voices have been incorporated meaningfully.</p>
<p><b>Recommendation 16:</b> The Welsh Government should work with local authorities to review how engagement and consultation with the Gypsy, Roma and Traveller communities during the accommodation assessment process can be improved, including the extent to which the measures and actions within the Anti-racist Action Plan have made a difference.</p> <p><b>Response: Accepted</b></p>	<p>A fully informed Gypsy and Traveller Accommodation Assessment (GTAA) is only achievable through effective engagement with the community. The revised GTAA Guidance strengthens the requirement for meaningful and effective engagement with Gypsy and Traveller communities.</p> <p>Public consultation of four Gypsy and Traveller guidance have taken place, which includes 'Undertaking a Gypsy and Traveller Accommodation Assessment'.</p> <p>This guidance has been informed by interviews with over 200 members of the Gypsy and Traveller community, whose voices have been listened to and reflected in the final guidance.</p> <p>The guidance also considers the impact of the Anti-racist Wales Action Plan, with a focus on how its measures have influenced engagement and consultation practices during the assessment process.</p> <p>I expect positive relationships between all local authorities and communities to underpin all future GTAAs, and my officials will continue to monitor how engagement practices evolve in line with the guidance.</p>
<p><b>Recommendation 17:</b> The Welsh Government should clarify what process is in place to monitor the Gypsy and Traveller</p>	<p>There is a scrutiny process both at official level and at Ministerial level as part of the GTAA cycle process. Once a GTAA is submitted and scrutinised, Ministers can accept reject or accept with modifications, each local authorities GTAA but are expected to continue to deliver against their</p>

<p>Accommodation Assessments on an all-Wales basis in order to gain an understanding of accommodation needs at a national as well as a local level.</p> <p><b>Response: Accepted</b></p>	<p>existing GTAA until the new assessment had been approved.</p> <p>Officials can use the content of the GTAA's, their existing knowledge about the quality of Gypsy and Traveller sites and any casework identified through the Advocacy and Advice contract to discuss specific sites or issues with local authorities.</p> <p>As outlined above, as part of the GTAA process, officials are carrying out regular monitoring with local authorities to hold them to account for their duty in meeting the need they identified in their GTAA.</p> <p>These monitoring arrangements have also included raising awareness of the Capital Sites Grant funding and uptake this financial year to date has been excellent.</p>
<p><b>Recommendation 18:</b> The Welsh Government should conduct a broader review of how the funding for the development of sites relates to the requirements in terms of the standards of sites.</p> <p><b>Response: Accepted</b></p>	<p>Officials review the Site Capital guidance annually to ensure standards are followed and the most up to date information and guidance is included.</p> <p>We have added the option to use the capital grant for site acquisition to further support local authorities to meet their duty to provide accommodation for these communities.</p> <p>As a result of increased market costs, the guidance now reflects the maximum cost per new pitch has been increased from £150,000 to £200,000.</p> <p>We have also removed bidding round deadlines, so that in 2025–26, the bidding process will remain open year-round.</p>
<p><b>Recommendation 19:</b> The Welsh Government should explore all possible options for funding Gypsy, Roma and Traveller accommodation, including whether the criteria for the Capital Sites Grant should be broadened to allow local authorities to purchase land for the development of new sites and how funding could be used to support the development of private sites.</p> <p><b>Response: Accepted</b></p>	<p>As part of the Capital Sites funding for 2024-25, we have added the option to use the capital grant for site acquisition to further support local authorities to meet their duty to provide accommodation for these communities.</p> <p>Officials are currently exploring how we can fund private sites for Gypsy, Roma and Traveller communities.</p>

<p><b>Recommendation 20:</b> The Welsh Government should provide an update on the work undertaken to provide transit pitches across Wales before the Senedd's summer recess in 2023.</p> <p><b>Response: Accepted</b></p>	<p>Please see response to Recommendation 2.</p>
<p><b>Recommendation 21:</b> The Welsh Government should set out how it intends to work with the police and partner organisations to communicate to the Gypsy, Roma and Traveller communities any anticipated changes to plans for enforcing the Police, Crime, Sentencing and Courts Act 2022 in Wales.</p> <p><b>Response: Accepted</b></p>	<p>Officials are members of the Criminal Justice Anti-Racist Wales Subgroup who are working collaboratively with police forces and community representatives to develop protocols for managing unauthorised encampments.</p> <p>A Task &amp; Finish Group has been established, bringing together community members, Welsh Government officials, representatives from all four Welsh police forces and voluntary sector partners.</p> <p>This group is working to finalise the protocols and ensure they reflect the lived experiences of Gypsy, Roma and Traveller communities.</p>

Document is Restricted