

Agenda – Equality, Local Government and Communities Committee

Meeting Venue:

Committee Room 5 – Tŷ Hywel

Meeting date: 14 July 2020

Meeting time: 13.30

For further information contact:

Naomi Stocks

Committee Clerk

0300 200 6565

SeneddCommunities@senedd.wales

Informal pre-meeting

(13.30–14.00)

In accordance with Standing Order 34.19, the Chair has determined that the public are excluded from the Committee's meeting in order to protect public health. This meeting will be broadcast live on www.senedd.tv

1 Introductions, apologies, substitutions and declarations of interest

(14.00)

2 Inquiry into Covid-19 and its impact: evidence session on homelessness

(14.00–15.00)

(Pages 1 – 28)

Rhys Gwilym-Taylor, Senior Policy and Public Affairs Officer, Crisis

Jennie Bibbings, Campaigns Manager, Shelter Cymru

Katie Dalton, Director, Cymorth Cymru

Break

(15.00–15.15)

3 Inquiry into Covid-19 and its impact: evidence session on housing

(15.15–16.15)

(Pages 29 – 60)



Clarissa Corbisiero, Director of Policy and External Affairs / Deputy Chief Executive, Community Housing Cymru

Matt Dicks, Director, CIH Cymru

Cllr Andrea Lewis, Housing Spokesperson, Welsh Local Government Association

Jim McKirdle, Housing Policy Officer, Welsh Local Government Association

Calum Davies, Welsh Policy & Public Affairs Officer, National Residential Landlords Association

4 Paper to note

(16.15)

(Page 61)

4.1 Correspondence from the Deputy Minister and Chief Whip regarding the evidence session on 14 May – 30 June 2020

(Pages 62 – 67)

5 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of the meeting and items 1 and 2 of the meeting on 16 July 2020

(16.15)

6 Inquiry into Covid-19 and its impact: consideration of evidence

(16.15–16.25)

7 Consideration of correspondence with the Llywydd regarding the Renting Homes (Amendment) (Wales) Bill

(16.25–16.30)

(Pages 68 – 73)

Document is Restricted

We welcome the opportunity to provide insight into the effect of coronavirus on individuals experiencing (or at risk of) homelessness and on services that provide support for individuals in Wales. Our focus is on the systems and framework changes that can help Welsh Government transition to a housing-led approach to ending homelessness, as recommended by the Homelessness Action Group, as a key part of its ongoing response to the coronavirus.

We suggest the committee considers these questions relating to homelessness and the coronavirus outbreak:

- What work is ongoing on a national and local level to assess the needs of the cohort of people newly accommodated from the street to understand the support and accommodation needs and provide for those needs to ensure that everyone is able to move on to more permanent accommodation as soon as possible?
- What further changes are needed prevent more people from becoming homeless in the short-medium term, and in particular once lockdown measures are eased?
- What actions can the Welsh Government take to working with the UK Government on measures to prevent homelessness among some groups including action on evictions, support for those with no recourse to public funds and using housing benefit to pay rent?
- Following the legal, operational and funding changes that have occurred as a crisis response to the outbreak, what progress can Welsh Government and its partners maintain after the crisis to help realise its ambition to end homelessness in Wales (i.e. making homelessness rare, brief and non-repeated), as per the Homelessness Action Group's recommendations that it has accepted in principle?

Homelessness and the coronavirus

People experiencing homelessness, particularly those sleeping rough, are among the most exposed and at risk to coronavirus. People sleeping rough are for example, three times more likely to experience a chronic health condition including asthma and chronic obstructive pulmonary disease (COPD). People also face greater difficulty following the public health advice to socially distance and, if necessary, self-isolate due to either a lack of accommodation or the accommodation not being suitable for this (e.g. being overcrowded).

For many individuals and households this outbreak has added to existing pressures. Households already facing mounting pressures of low wages and high rents, housing benefit not covering the costs of rent, a shortage of truly affordable housing, and multi-agency support not being in place are at greater risk of homelessness in the current circumstances.

The emerging trends and themes from our research (to be published shortly) suggest that services are providing support for an increased number of individuals, some of whom have greater and more complex support needs. In addition, the challenges reported by services include difficulties in accessing wider statutory services, such as mental health and substance misuse services, challenges with hunger and access to food, and challenges with moving people on from temporary accommodation into suitable permanent housing.

Summary

Our submission is structured as follows:

- **The short-term actions** and measures Government and Local Authorities can take to move individuals currently in temporary accommodation onto more permanent housing.
- **The medium term actions** and measures Government can take to prevent people from becoming newly homeless as a result of the Coronavirus.



Senedd Cymru | Equality, Local Government and Communities Committee

**Inquiry into COVID-19 and its impact on matters relating to the Equality,
Local Government and Communities Committee's remit**

A response from Cymorth Cymru

1 July 2020

About Cymorth Cymru:

Cymorth Cymru is the representative body for providers of homelessness, housing and support services in Wales.

Our members provide a wide range of services that support people to overcome tough times, rebuild their confidence and live independently in their own homes. This includes people experiencing or at risk of homelessness, young people and care leavers, older people, people fleeing violence against women, domestic abuse or sexual violence, people living with a learning disability, people experiencing mental health problems, people with substance misuse issues and many more.

We act as the voice of the sector, influencing the development and implementation of policy, legislation and practice that affects our members and the people they support. We are committed to working with people who use services, our members and partners to effect change. We believe that together, we can have a greater impact on people's lives.

We want to be part of a social movement that **ends homelessness** and creates a Wales where everyone can **live safely and independently** in their own homes and **thrive in their communities**.

Website: www.cymorthcymru.org.uk

Twitter: [@CymorthCymru](https://twitter.com/CymorthCymru)

Contact:

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1. Introduction

1.1 Cymorth Cymru welcomes the opportunity to contribute to the Committee's inquiry. We have focused on the impact of COVID-19 on the homelessness, housing and support sector.

1.2 Our members have faced unprecedented challenges over the past few months, making significant changes in order to respond effectively and continue to deliver safe, high quality services to thousands of people across Wales. In this response we will outline the key challenges, the response from government and its partners, and our views about the future.

1.3 The importance of home

1.3.1 This pandemic has highlighted the importance of the 'home' in providing safety, stability and security to people during this period. It has also exposed the stark inequalities facing people who do not have a home to call their own, those who are living in unsuitable or precarious accommodation, and people who experience violence and abuse in their home.

1.3.2 What do we mean by a good home?

- **Accessible** to disabled people and adapted for independent living
- **Affordable** rent or mortgage payments and running costs
- **Connected** physically, socially and digitally with access to services, support and outside space
- **Culturally adequate**
- **Good condition** inside and out
- **Safe from harm and abuse** in the home and surrounding neighbourhood
- **Secure and stable**
- **Sufficient space** and well designed

1.3.3 Having somewhere to live that encompasses all these elements is fundamental to personal dignity, individual wellbeing and, as the recent crisis has demonstrated, maintaining public health. Moving over 800 people into emergency accommodation, for instance, and providing them with a secure and safe environment in which to live has been essential in lowering community transmission of COVID-19. However, it has also highlighted some of the shortcomings of our current system. It is imperative that we learn from this experience and reduce the housing inequalities faced by people in Wales, so that we are better equipped to face future pandemics.

1.3.4 As we look towards the future, we strongly advocate for measures to ensure that everyone has a good quality home and the support they need, as this will be a foundational element in tackling not only COVID-19, but also ending homelessness for good.

2. Impact and key challenges

2.1 Impact on people experiencing homelessness and VAWDASV

2.1.1 As described above, COVID-19 has highlighted the importance of having a safe and secure home in which people are able to practice social distancing, have access to adequate hygiene facilities and can self-isolate from other people, thereby preventing the spread of the virus. Unfortunately, many people did not have access to these basic requirements at the start of the pandemic and were therefore much more exposed to the risk of COVID-19.

2.1.2 **People sleeping rough:** This has been hardest felt by those sleeping rough, as aside from lacking the protection that a home affords, they are also more likely to have underlying health

conditions – including respiratory illnesses¹, placing them at a higher risk of falling seriously ill with COVID-19 than the general population.

- 2.1.3 **Emergency and other forms of shared accommodation:** COVID-19 has demonstrated that some types of emergency accommodation such as floor space and shared rooms are not adequate due to people's inability to practice social distancing and self-isolation. Communal washing and food preparation areas have also posed challenges to people's ability to maintain hygiene practices and avoid transmission.
- 2.1.4 **Hidden Homelessness:** Many people who were living in precarious housing situations, such as 'sofa surfing' have had to present to homelessness services during this pandemic. This has exposed the difficulties facing many people who were previously hidden from sight and weren't captured in homelessness statistics. This has particularly affected younger people who are more likely to have been in precarious accommodation prior to outbreak of the virus².
- 2.1.5 **Victims of violence against women, domestic abuse and sexual violence (VAWDASV):** Home has been presented as a place of safety during this pandemic, with politicians urging us to stay safe by staying at home. However, for too many people their home is associated with abuse and violence. Evidence from Welsh Women's Aid suggested that perpetrators have utilised lockdown restrictions to increase coercive and controlling behaviour. People experiencing domestic abuse have been in lockdown for three months, spending twenty four hours a day with their abuser, unable to escape or call for help. In addition, people have had less interaction with health, education and other public services, which could have identified them as at risk of abuse.

2.2 Impact on the homelessness, housing and support sector

- 2.2.1 **Staffing levels:** COVID-19 has impacted staffing levels, with some staff members having to self-isolate with COVID-19 symptoms and others being in the shielding category. This has led to staff shortages in some services and required local authorities and providers to redeploy staff and/or use agency staff as cover. The introduction of the Test Trace Protect system has also led to concerns about whether increased numbers of staff will need to self-isolate, should someone living or working within the accommodation project test positive.
- 2.2.2 **Personal Protective Equipment (PPE):** The virus had a huge impact on access to, and availability of, PPE and hygiene products. At the onset of the outbreak access to supply varied greatly across Wales as the sector struggled to meet this new demand. In the early stages of this pandemic a number of local authorities did not receive the stock they had anticipated, and this had a knock-on effect on the ability of support providers to access it. Most had to source stock themselves to top up what, if any, was provided through central local authority stocks. They also faced difficulties in balancing the urgency to procure PPE with concerns about whether supplies were safe and of good quality, as most support providers do not have PPE procurement expertise. There were also issues with security of supply, with delivery dates being delayed, or even cancelled, in some instances. This was sometimes due to stock being re-allocated to the NHS in England. There was also initial confusion regarding how and when PPE should be used, as the official four-nation government guidance was focused on health and social care settings. Support providers wanted to ensure that people using and delivering services were safe from transmission, but did not want to divert stock from the NHS if it was not necessary.

¹ <https://www.gov.uk/government/publications/health-matters-rough-sleeping/health-matters-rough-sleeping>, this study covers England only but is reinforced by Cymorth Cymru's Health Matters report in Wales

(https://www.cymorthcymru.org.uk/files/5115/1791/4790/Cymorth_Cymru_Health_Matters_report.pdf)

² <https://www.bbc.co.uk/news/uk-wales-52561650>

- 2.2.3 **Testing:** Getting staff tested from across the homelessness, housing and support sector has been difficult during this pandemic. There has been an inconsistent response across Wales, with confusion about the process that needs to be followed, and the priority of different sectors. We are not disputing the effort put in, or the progress made, but it has been a significant source of concern for our members. Testing has been viewed as vital in reducing the need for unnecessary self-isolation and therefore staff shortages in services.
- 2.2.4 **Move to digital methods of support:** Due to the stringent lockdown rules, our members have had to transform their delivery models in order to ensure that people could continue to receive support. While some services, such as supported accommodation and outreach, have maintained an element of face-to-face delivery, many have moved to virtual and phone support. This had placed strain on providers' existing digital infrastructure, but they adapted quickly and have continued to deliver vital support services. The longer term impacts of this type of support are not yet known, but we know that providers have had concerns about barriers to digital inclusion for people using services, and particularly those on low incomes who can't afford access to tech and devices. Providers have worked very flexibly to overcome or address these challenges, but there are concerns about the extent to which people using services are able to build trusting relationships and share their more pressing issues and worries over a telephone or video call, rather than face-to-face.
- 2.2.5 **Increase in referrals:** Many providers told us that they have seen an increase in referrals since the outbreak. This is due to a variety of reasons, including the precarious nature of the job market, relationships and housing status. Understandably, the pandemic has been a very stressful time for many households, with family or relationship breakdown being one of the consequences. Some local authorities have noted an increase in presentations from young people and Llamau have told us that there has been a 50% increase in calls to their youth homelessness helpline since the lockdown period. Family breakdown and the unsustainable nature of sofa surfing during the pandemic are thought to be key factors.
- 2.2.6 **Mental health and wellbeing (people using services):** COVID-19 has had a significant impact on people's mental health and wellbeing. Many people using homelessness, housing and support services have been living in unsuitable accommodation and face many other challenges such as mental health problems, domestic abuse and/or addiction issues. The outbreak of COVID-19 is an additional stress to everyone, but for many of the people our members support, this is an added stress on top of the traumas they have already experienced. Isolation, boredom and frustration are also having a significant impact on people's wellbeing. Many have found it hard to access mental health services due to the service capacity issues and the increased demand as a result of COVID-19.
- 2.2.7 **Mental health and wellbeing (staff):** Lots of staff have had to deal with the added pressures of short-staffing and redeployment to other services. Many are still delivering face-to-face services and having to manage the health risks and anxieties associated with this. Some are dealing with extremely challenging circumstances in emergency accommodation, as hundreds of people have brought in off the streets and housed in new environments, living under COVID-19 restrictions and trying to cope with trauma, mental health problems and addiction. Staff who are working from home are having to cope with feelings of isolation due to a lack of social contact and support networks. They continue to experience secondary trauma through the support work they deliver, but do not have the benefit of being able to go back to the office and talk things through with colleagues.
- 2.2.8 **Communication of COVID-19 restrictions:** Some providers noted that people using their services had experienced difficulty in understanding the COVID-19 guidelines and how they applied in Wales, particularly when the UK Government diverged from the policies of the

other nations. Wales is heavily reliant on the London-based media for its news, and their failure to communicate the differences in policy across the UK has not helped.

- 2.2.9 **Challenges within accommodation:** While lots of people have managed to adapt to COVID-19 restrictions, it has proved difficult for many. Service providers have faced huge challenges with encouraging people to understand and comply with social distancing and self-isolation guidelines. There have also been instances of anti-social behaviour, particularly in emergency accommodation, with some examples of criminal activity. It is widely recognised that some of the issues are related to people's experiences of trauma, mental health problems and/or addiction issues, and services have tried to take a compassionate and trauma informed approach. However, it has been an extremely challenging time for providers of accommodation and support as they have tried to keep everyone safe and well.
- 2.2.10 **Availability of accommodation:** The changes to the interpretation of the legislation regarding priority need and vulnerability during this crisis has been welcome, as nobody should be left without housing during a pandemic – and we cannot turn our backs on people afterwards. However, we do recognise that there have been implications for local authorities as higher numbers of people have qualified for the legal duties, particularly in a system where housing is scarce. As the pandemic has progressed, and people continue to present to homelessness departments, the lack of accommodation has been a significant cause for concern. This underlines the importance of providing enough social housing to meet the needs of people in Wales.
- 2.2.11 **VAWDASV:** There has been an increase in the number of reported VAWDASV incidences since the implementation of the Government lockdown on March 23rd. Data from the UK level shows an increase a 25% increase in calls and online request for help³. In Wales, Welsh Women's Aid have reported that despite an initial drop in calls, the Live Fear Free helpline has seen a 49% increase in calls, with these calls usually increasing in complexity with case studies showing that call times are now doubling since the lockdown.
- 2.2.12 **Learning Disability issues:** COVID-19 has also affected the Learning Disability and supported living sector. Whilst the issues are largely part of health and social care remit, there are significant crossovers into the Equalities, Local Government and Communities Committee's remit. Key issues facing our members in this area have been the challenge of having PPE guidance that is relevant to their setting, of accessing supplies of PPE in a timely and reliable manner, and particular issues around changes to rules around exercise, hospital visiting and support worker accompaniment. These have all been addressed by Welsh Government quickly, but it did underline a situation where guidance seemed to be geared towards domiciliary care or residential care, and not supported living settings.
- 2.2.13 **Additional costs:** The crisis has resulted in a significant increase in expenditure for support providers due to the procurement of PPE, additional staffing costs, essential items for people using services, and investment in information technology to facilitate remote working. One of our third sector members expected additional costs of at least £165K during the first three months of the pandemic, to cover expenditure such as PPE and cleaning supplies, emergency food supplies, resources for people using their services and technology to enable home working.
- 2.2.14 **Loss of income:** Organisations have also lost fundraising revenue as events had to be cancelled due to the outbreak, an income stream which many have used to subsidise their services due to the decreased levels of public funding over the recent years. The organisation referenced above also expects to lose £300K in budgeted income due to the cancellation of fundraising events and decreased community fundraising. Another issue

³ <https://www.bbc.co.uk/news/uk-52157620>

raised by organisations providing refuge and other forms of supported accommodation is the impact of voids on their finances. Where people are shielding or having to self-isolate in shared accommodation, providers have deliberately left some rooms empty in order to reduce the risks of transmission. However, this has resulted in the loss of housing benefit, which is a critical element of the scheme's financial sustainability.

- 2.2.15 **Longer term financial sustainability:** Many organisations have reached into their reserves to cover initial costs, and have been unsure as to whether these can be recouped. As COVID-19 will likely be a public health problem for the foreseeable future, providers have had to factor in assumptions around social distancing and PPE use into their long term financial planning. The impact of additional expenditure and loss of income during this pandemic is likely to have an impact on organisations' reserves, and therefore their financial resilience and sustainability, in the medium to long term.

3. Response

3.1 Welsh Government

- 3.1.1 **Initial response:** Cymorth raised concerns with senior Welsh Government officials about the potential impact of COVID-19 at the end of February. They asked us to collate a number of scenarios which would highlight the challenges and risks posed to particular groups of people and services. Following this, a meeting of housing and health officials and third sector stakeholders was convened to develop the first piece of COVID-19 guidance for homelessness and substance misuse services in Wales. This also led to the development of 'phase one' of the Welsh Government's response to homelessness during the pandemic. We were pleased with the responsive and collaborative nature of officials' response and this set the tone for their approach throughout the first three months of the pandemic.
- 3.1.2 **Coordination and collaboration:** Since the start of the pandemic Cymorth Cymru has been invited to weekly COVID -19 strategic coordination meetings with the Welsh Government's Housing Directorate, Social Services Directorate and the VAWDASV team. These have enabled officials to keep stakeholders up-to-date on the latest Welsh Government activity and priorities, as well as giving us a space to raise key or emerging issues and challenges facing our members. This collaborative approach has been extremely positive for stakeholders working across these policy areas and has resulted in better communication and coordination between Government and the sector. We have been able to raise issues facing our members throughout this pandemic and have received fairly rapid answers and actions in response to them.
- 3.1.3 **Coproduction of written guidance:** In addition, Welsh Government housing officials have been extremely collaborative in the development of official guidance, often doing so in response to issues raised by us and other stakeholders. We have been involved in the development of guidance on a range of issues, often involved from the beginning of the process. During a period when there has not been time for the usual consultation processes, officials have been extremely collaborative and taken on board our views and challenge.
- 3.1.4 **£10million to provide housing and support:** Cymorth very much welcomed the Welsh Government's £10m fund to provide emergency accommodation⁴ and support for people who were sleeping rough or in unsuitable accommodation. The initial £10m was in contrast to the £3.5m announced by the UK Government for England and made a statement about the Welsh Government's commitment to getting people off the streets and into a safe place.

⁴ <https://gov.wales/10-million-emergency-support-rough-sleepers-wales/10-million-emergency-support-rough-sleepers-wales/10-million-emergency-support-rough-sleepers-wales/10-million-emergency-support-rough-sleepers-wales>

- 3.1.5 We know that housing alone will not solve homelessness and we were really pleased to see the emphasis on providing both housing *and* support with this funding. In addition, it was extremely positive to see the emphasis on *appropriate* accommodation which included self-contained rooms with access to personal bathrooms and hygiene facilities, where possible. We were also very pleased to see the commitment to providing housing and support for people with no recourse to public funds, as they are often excluded from being able to access the services they need.
- 3.1.6 The Welsh Government made this funding available in a flexible and timely way for services during this crisis. This flexibility has allowed services to provide essential support and items, such as personal cooking appliances, cleaning products, digital equipment and subscriptions, and other essential items which have helped sustain people in their accommodation throughout this period. Welsh Government have placed trust in local authorities and services to make the right decisions for the people they support, whilst also providing them with the requisite funds in an open and flexible way, which has been very much welcomed by the sector.
- 3.1.7 As a result, over 800 people have been housed in emergency accommodation and been provided with health care and support. Many have started to receive treatment for addiction and some people have been supported to move on to more permanent accommodation. The response is something that Wales can be extremely proud of.
- 3.1.8 **Sourcing accommodation:** Access to accommodation has varied in different local authority areas, with some looking for additional support to secure additional places for people presenting to homelessness departments. The Welsh Government has provided assistance by having strategic conversations with hotels and then passing details onto local authorities to secure the accommodation as part of their COVID-19 response. Officials have also worked with the National Residential Landlords Association and Rent Smart Wales to put out a call for private rented properties. They have facilitated the registration of private rented sector properties, which should help to increase the availability of emergency and longer term housing available to local authorities.
- 3.1.9 **Removal of legal barriers:** The decision by the Minister for Housing and Local Government to write to local authorities about the interpretation of priority need and vulnerability⁵ was an extremely positive step in removing barriers to access to housing and support. However, this also exposed the need to increase the provision of truly affordable housing to ensure that local authorities have the resources to provide people with the accommodation they need.
- 3.1.10 **Phase Two response to homelessness:** We also welcome the announcement on the 28th May regarding an additional £20m and the plan for phase two of Wales' response to homelessness during the COVID-19 pandemic. It is absolutely essential that the people in emergency accommodation are helped into more permanent accommodation and we support the Welsh Government's ambition to transform homelessness services with a focus on rapid re-housing. This reflects the Homelessness Action Group's major report from March 2020⁶ about how the Welsh Government should end homelessness in Wales. Our Director was a member of this group and we support the plans to enact its recommendations. Although government and the sector has been focused on the crisis response, it is important that this report is not forgotten as we move to recovery and the 'new normal'.
- 3.1.11 **£40million for social care:** The Welsh Government's announcement to provide £40m in additional funding for adult social care to cover additional costs as a result of COVID-19, was another positive response. We are currently in the process of working with Welsh

⁵ https://gov.wales/sites/default/files/publications/2020-04/guidance-for-local-authorities-in-supporting-people-sleeping-rough-covid-19_0.pdf

⁶ <https://gov.wales/homelessness-action-group-report-march-2020>

Government alongside CHC, Care Forum Wales and others on how this funding can be allocated in the most appropriate manner, including ensuring providers can access funding quickly when necessary. By the end of June, there remain providers within supported living who have not received any money from this fund. While we understand the need to ensure good governance and appropriate use of public money, it is vital that this funding reaches the frontline services as soon as possible, to compensate for the significant additional expenditure experienced during the initial phases (and ongoing phases) of the pandemic. It is disappointing that it has taken until the end of May for any providers of supported living to begin receiving payment through this fund (with some still waiting), for expenses incurred from March onwards. We should add, that in response to this, Welsh Government Social Care officials have invited provider and local government representatives to a working group, to establish guidance for any future tranche of funding for social care, to ensure expedited payment.

- 3.1.12 **Third Sector funding:** The announcement that £24m would be made available to third sector organisations⁷ was welcomed. The funds will help third sector organisations in the housing, homelessness and support sector deal with cash flow problems and to pay bills during a period when physical fundraising and others sources of revenue have decreased. However, there continue to be concerns about ongoing costs once this fund ceases to exist.
- 3.1.13 **£500 payment for social care staff:** The decision to provide a £500 bonus for care sector staff, including our members in the supported living sector was welcome. However, many of the people working in the homelessness, housing and support sector do not qualify for this payment, despite their continued work to provide face-to-face support to people through outreach services, supported housing and emergency accommodation during this pandemic.

3.2 Homelessness, housing and support sector

- 3.2.1 **Critical workers:** We would like to take this opportunity to recognise the extraordinary efforts of homelessness, housing and support staff during this crisis. Throughout this period staff have continued to provide face-to-face services, putting themselves and their families at risk in order to help others. As this crisis has demonstrated, workers from these sectors are vital for the health of society as a whole.
- 3.2.2 Our members' employees have helped to house people who were sleeping rough in appropriate accommodation, thereby protecting them and the wider public from possible transmission of the virus. They have worked hard to help people in supported accommodation, refuges, hostels and other settings to stay safe and well. Supported living staff have helped people with learning disabilities live happy, safe and fulfilled lives – whilst following public health guidance. The collaboration between providers and government and the collective efforts of both parts of our membership have played an important part in reducing the spread of COVID-19. This has been an incredibly challenging period and it should not be underestimated how difficult has been for local authorities and their partners. It is important to appreciate the work of local authority, housing and support provider staff during this pandemic and we urge all Members of the Senedd to publicly recognise their efforts and achievements.
- 3.2.3 **Urgency of response:** The pace at which the sector had to respond was extremely challenging, particularly as very little was known about the virus at the beginning of the pandemic. It was unclear what extra resources would be available to tackle this pandemic, but all partners acted quickly to safeguard the health and wellbeing of people using homelessness, housing and support services in Wales.

⁷ <https://gov.wales/welsh-government-boosts-support-valued-charities-and-third-sector-organisations-wales>

- 3.2.4 **Emergency accommodation:** Many local authorities moved quickly to ensure that people who were sleeping rough or in unsuitable accommodation were provided with accommodation and support to protect them from the virus. To have provided over 800 people with emergency accommodation and support is an extraordinary achievement and credit to the commitment and innovative thinking of local authorities and their partners. There have been different approaches in different local authority areas, including block booking large hotels, utilising bed and breakfasts, and securing holiday accommodation. Cardiff City Council, for example, have taken over two hotels and are operating them as supported accommodation with 24-hour staffing on site, ensuring experienced support staff were present alongside less experienced staff deployed from elsewhere.
- 3.2.5 **Local coordination and collaboration:** Some local authorities took a proactive approach by starting weekly COVID-19 coordination meetings prior to official guidance being published. These involved third sector partners who in turn shared their respective crisis response plans in order to enhance knowledge and practice across the sector. The Centralised Coordination Cells, set up in line with Welsh Government guidance, have been key to coordinating the response and being able to respond appropriately to local needs. Local authorities and providers have welcomed the involvement of other public services, such as health and the police, as this has supported the sharing of information and a multi-disciplinary response to emerging issues.
- 3.2.6 **Multi-disciplinary collaboration:** There have been some very good examples of multi-disciplinary working across Wales, particularly with substance misuse services. Cardiff City Council has an established Multi-Disciplinary Homelessness Team⁸ and has built on this to ensure that the large number of people housed in emergency accommodation have had access to health care and support, including dedicated mental health and substance misuse support workers. This has led to a number of people engaging in treatment services for addiction and starting to deal with experiences of trauma and some of the underlying issues that contributed to them becoming homeless.
- 3.2.7 **Crisis planning and adapting service delivery:** Due to the stringent lockdown guidelines and the anticipated impact of the virus on staffing levels, it became clear that services would need to adapt substantially in order to meet people's support needs during the crisis. Our members started crisis planning before lockdown began, prioritising services, identifying people delivering and using services who were at particular risk to the impact of the virus, training staff in alternative services, setting up clear lines of communication, considering adaptations to accommodation and setting up digital infrastructure to enable virtual support services. A significant amount of work took place in the first few days and weeks, but support providers responded rapidly and always put people using services at the heart of their plans.
- 3.2.8 **Encouraging compliance with lockdown:** Many providers have adapted their services in response to the challenges of COVID-19 and helping to encourage people to comply with social distancing and self-isolation measures, as we have outlined in our practice report⁹. Local Authorities have been open to these changes and have played a key role in facilitating them. These changes include:
- **Practical changes** to services and new protocols, including changes to physical space and developing cleaning and hygiene protocols.
 - Ensuring people have **access to essential items and support**, such as food supplies and cooking equipment, financial support, healthcare and pharmacy support.
 - **Keeping people active and engaged** including physical activity, mindfulness, art materials and activities to alleviate boredom.

⁸ https://www.cardiff.gov.uk/ENG/resident/Housing/rough-sleeping/what-we-are-doing/Pages/default.aspx#anchor_2

⁹ https://www.cymorthcymru.org.uk/files/5715/9033/0280/COVID-19_practice_guidance_lockdown_guidance_-_Eng.pdf

- **Helping people to stay connected** by purchasing equipment such as internet hubs, mobile phones and other communication devices and supporting digital engagement by creating dedicated social media groups/channels for people using services
- **Regular check ins**, with support providers offering weekly or sometimes daily wellbeing phone calls, and developing befriending call services for those experiencing isolation.

- 3.2.9 **PPE supply:** One of the biggest challenges facing the sector was the availability and cost of PPE for the homelessness, housing and support sector. As a result, Cymorth worked with the Welsh Government and Community Housing Cymru (CHC) to secure a weekly supply of 2000 litres of hand sanitiser from Swansea University for the homelessness, housing and support sector. For the past few months this has been delivered to four regional distribution hubs, each hosted by a housing association, where individual organisations have been able to pick up their supply.
- 3.2.10 Following on from this success, we again worked with CHC and Care and Repair Cymru to secure supplies of Fluid Resistant Face Masks for our members. The procurement process was led by CHC, Linc Cymru and Pobl Group and resulted in over 300,000 masks being delivered to the sector during May and June. The same organisations have also led a procurement process to secure a longer term supply of masks for CHC, Cymorth and Care and Repair members. This supply line will start in July and a range of organisations, including housing, homelessness, VAWDASV and substance misuse support providers will benefit from the price and security of this arrangement.
- 3.2.11 **PPE Advisory Note:** The four-nation PPE guidance was aimed at health and social care services, and was therefore difficult for our members to interpret and apply within their services. We called for additional guidance and worked with Public Health Wales to inform their Advisory Note for housing, health, social care and support settings¹⁰. This has been incredibly helpful and enabled the sector to understand how much PPE they needed, and in what circumstances it is necessary.
- 3.2.12 **Housing First:** During this crisis the Housing First model has continued to help people who would normally be at highest risk of health issues and / or repeated homelessness, safe and well. We have been humbled by the levels of dedication shown by Housing First providers across Wales. In Conwy / Denbighshire, the outreach team continues working with people sleeping rough, whilst using PPE to manage the risk. In areas from Newport to Swansea, from Anglesey to Conwy, providers are still managing to move people into accommodation, adopting working practices that allow them to keep socially distant. Despite significant pressures on staffing to relocation to care in some areas, and sickness in other areas, the support has continued for people, and new people have housed as part of these schemes.
- 3.2.13 The new ways of working have proved difficult, but they are still yielding results. Phone or remote contact through Skype or other digital means are useful, and provide some reassurance of regular contact, but they also are felt to be not as effective in building new relationships in the way that Housing First clients require. Providers of Housing First are committed to making this work, however and are seeing the success of getting >800 people into temporary accommodation as a spring board for working with that cohort using a rapid re-housing or Housing First approach. For example, Salvation Army in Cardiff have been proactive with this opportunity and have already begun building those trusting relationships with an eye on longer-term engagement with Housing First in the future for those individuals. Some providers have reported contact and regular communication with people who have not found it possible to engage with any form of public services for years.

¹⁰ <https://phw.nhs.wales/topics/latest-information-on-novel-coronavirus-covid-19/information-for-healthcare-workers-in-wales/housing-health-social-care-and-support-settings-examples-to-inform-implementation-of-the-updated-infection-prevention-and-control-guidance-covid-19/>

4. The future

4.1 Economic impact and the subsequent effect on homelessness

- 4.1.1 **Economic impact and resulting effects:** COVID-19 is likely to have a significant negative impact on the Welsh economy, and thus result in higher numbers of homeless presentations. Between March 1st and May 12th there were 122,160 individual claimants for Universal Credit in Wales¹¹, a significant increase. The end of the furlough scheme may also have a significant impact on unemployment. The loss of jobs, reduction in income and increasing reliance on the welfare system may result in rent arrears, evictions, and homelessness if people don't have the right support. Our members have told us that a number of people receiving support are losing their jobs. Providers of youth homelessness services have significant concerns about the impact of this pandemic on the employment prospects of young people, particularly those who are care experienced and face other inequalities.
- 4.1.2 The virus will likely have a long term impact on the Welsh Government's finances and in light of the upcoming Senedd elections each party needs to consider its priorities and how these will mitigate any economic fallout from the virus. Significant investment in social housing and multi-disciplinary support services will be essential if Wales is to ensure that homelessness does not increase substantially over the coming years.

4.2 Homelessness, housing and support

- 4.2.1 **Phase Two:** The Welsh Government needs to ensure that the >800 people housed in emergency accommodation are able to transition into permanent housing with access to support, mental health and substance misuse services. The announcement of £20m of funding to transform services and accommodation to facilitate this is very much welcomed and we look forward to working in collaboration with the Welsh Government, our members and partners to deliver this. The process for applying for this funding has been rapid, and put a strain on local authorities and their partners as they have tried to develop their plans. It will be important to ensure that delivery of phase two continues in the collaborative, inclusive, person-centred, multi-agency approach during the phase one crisis response. It must result in sustainable housing-led solutions, based on evidence, which help us to make strides towards the ambition of ending homelessness in Wales. In order to achieve this, we must build on the partnership we have seen in the past few months and use all of the expertise, experience and knowledge that exists across the sector.
- 4.2.2 **Ending homelessness:** In order to end homelessness for good in Wales, housing and support need to be appropriate and accessible to all. While attention has been rightly focused on the crisis, we must not forget about the Homelessness Action Group's report¹² and recommendations. This government, and all political parties in the lead-up to the Senedd elections, should be committed to delivering these recommendations over the coming months and years.
- 4.2.3 **Right to adequate housing:** The impact of COVID-19 has demonstrated that adequate housing is a vital part of the solution to protecting public health. This crisis now provides the Welsh Government the opportunity to re-evaluate the legislation around housing, and incorporate a right to adequate housing for all¹³. This will also help to ensure that nobody has to sleep rough or live in precarious circumstances, thus contributing to the Welsh Government's goal of making homelessness rare, brief and non-recurring¹⁴.

¹¹ <https://committees.parliament.uk/publications/1232/documents/10384/default/>

¹² https://gov.wales/sites/default/files/publications/2020-03/homelessness-action-group-report-march-2020_0.pdf

¹³ <https://www.taipawb.org/wp-content/uploads/2019/06/RightToHousing-Full-ENG.pdf>

¹⁴ <https://gov.wales/sites/default/files/publications/2019-10/homelessness-strategy.pdf>

4.2.4 **Rapid re-housing:** Rapid re-housing is moving people from homelessness into housing without insisting on complex procedures or long waiting times. It recognises that the longer someone is homeless, the more likely they are to stay homeless. Rapid re-housing is on a spectrum, so some people will need a house urgently and then they may need little else. Others may need support whether a low level or high. For those with specific and considerable levels of need, they would adopt the rapid re-housing model known as Housing First. The planned transition towards a rapid re-housing model, as discussed by the Homelessness Action Group earlier this year¹⁵ needs to be prioritised by the Welsh Government to ensure that everyone has access to housing and support, a number of changes will need to be made to implement this:

- Increasing the supply of social and affordable housing stock through continued provision of the Social Housing Grant and increasing the contribution of private developers through enforcement of Section 106¹⁶ of the Town and Country Planning Act 1990.
- Working with social landlords to improve allocations policies and ending evictions into homelessness.
- Working with the private rented sector to increase access to affordable housing, including expanding the private sector leasing scheme.
- Putting empty properties back into use. There are currently 27,000 long term empty private sector residential properties in Wales¹⁷, repurposing these would provide a solution for the current affordable housing stock shortage. Due to the potential long term economic impacts of the pandemic, there may be additional empty buildings that could also be repurposed and incorporated into a rapid re-housing model, such as vacant businesses and residential properties normally used for student housing.
- Removing barriers to access: The crisis has provided an opportunity to revisit some of the barriers to homelessness support including priority need and vulnerability, local connection, as well as protection for renters. We welcome the removal of these barriers but recognise the importance of ensuring adequate housing supply and resources for local authorities to avoid unintended consequences.
- Ensuring people have the appropriate level of multi-agency support to help them to maintain a tenancy, through the provision of tenancy support, Housing First and supported accommodation.

4.2.5 **Future funding:** The £20m funding announced to facilitate the transition of people from emergency accommodation into permanent, sustainable housing solutions will play a big role in helping to facilitate these changes. However, this is only for 2020/21 and we urge the Welsh Government and opposition parties to consider how this can be extended in the next Senedd term to help local authorities and their partners to sustain this work and realise the ambition to end homelessness. The Housing Support Grant will play a significant role in this, and it is critical that it remains ring-fenced in the next Senedd term to ensure that it is directed where it is needed. In addition, we urge political parties to make a commitment to increasing the Housing Support Grant in the next Senedd term, as the sector cannot deliver the ambition of ending homelessness if it continues to face real term cuts in funding¹⁸.

4.2.6 **Psychologically informed approaches:** Across all levels, adopting a psychologically and trauma informed approach to service design and delivery is critical. Many people will likely have experienced new trauma as a result of the crisis, and ensuring that services can support people to deal with these traumas will be important in reducing other social problems such as substance misuse, self-harm and other mental health issues.

¹⁵ <https://www.crisis.org.uk/about-us/the-crisis-blog/wales-action-group-blog-9/>

¹⁶ <https://senedd.wales/research%20documents/gg15-007-planning-section%20106%20agreements/gg15-007.pdf>

¹⁷ <https://senedd.wales/laid%20documents/cr-ld12797/cr-ld12797%20-e.pdf>

¹⁸ https://www.cymorthcymru.org.uk/files/7915/7585/1535/Housing_Marketing_Report_2019_-_Eng.pdf

- 4.2.7 **Access to mental health services:** Ensuring that people who use services, and the staff who support them, have access to mental health support is therefore incredibly important to help mitigate the additional strains brought on by COVID-19. As we enter recovery and the phase two planning, it is essential that people using services have access to mental health services. We particularly encourage the use of clinical supervision in provider settings to ensure highest quality support to address potential vicarious trauma and the resulting negative impacts of burnout, staff turnover, and sickness levels.
- 4.2.8 **Substance misuse support:** This pandemic has seen substance misuse services work very effectively in partnership with homelessness services and this has had an extremely positive impact. However, there have been concerns that this amount of treatment and support will not be possible once the emergency funding runs out. It is essential that these services are funded to continue this work and ensure that people do not return to the streets. We also support the Homelessness Action Group's recommendations on harm reduction, using evidence based practice to improve health outcomes and reduce homelessness.
- 4.2.9 **Planning for more referrals:** In relation to this, Welsh Government needs to consider how it will manage the increasing number of homelessness and VAWDASV referrals and prepare in advance for future increases due to the impact of COVID-19. When the ban on evictions is lifted and the furlough scheme ends, we are likely to see an increase in presentations to homelessness services. We know that public spending cuts and increases in unemployment are likely, and will lead to homelessness. And we know that there are people who have been trapped in abusive relationships during lockdown, and we are likely to see an increase in VAWDASV referrals once restrictions are eased.
- 4.2.10 **Pay and recognition:** We cannot overstate the scale of the challenge that has faced homelessness, housing and support sector during this pandemic period. Staff have worked incredibly hard in supporting people with complex needs and multiple traumas. This work requires high levels of skills and expertise that must be recognised appropriately. We want staff from the sector to be paid at a fair rate in recognition for their work, but this requires an increase in the funding available through the Housing Support Grant. We would also like more public recognition of the contribution that housing support workers have made, and continue to make, to tackling COVID-19 and its impacts.
- 4.2.11 **Commissioning:** In line with the paragraph above, commissioning should be focused on sustainable services that deliver lasting change. This means ensuring that housing and support providers have the resources they need to deliver high quality, person-centred, psychologically informed services that are not cut short by arbitrary time limits. This includes the time and funding resources for staff support, reflective practice and clinical supervision where appropriate. Flexibility and trust is also important and this has been key to enabling the sector's response to COVID-19. The approach shown by commissioners during this period has been very welcome and enabled organisations to operate with flexibility and overcome the many challenges they have faced. We encourage Welsh Government and local authority commissioners to consider how this can be continued to benefit people using services.
- 4.2.12 As local authorities move towards phase two and consider the transformation of homelessness services, commissioners should work in partnership with housing and support providers to consider how these changes can be delivered in the spirit of partnership. Where possible, these changes should be made within existing contracts, to reduce disruption. Services should be given the chance to adapt to local authorities' new vision to ensure that we do not lose the knowledge, experience and expertise of staff and organisations which have been at the heart of service provision for decades.

- 4.2.13 In light of the continuing challenges posed by COVID-19, we would also like local authorities to consider offering a moratorium on commissioning for a period of time. This will enable providers to meet the continuing pressures related to COVID-19, and to develop long term plans for services for the future. Where services need to change in line with the Phase Two planning, local authorities should work with existing providers to adapt services rather than lose the expertise and dedication of services.
- 4.2.14 **Collaboration:** The collaborative approach which has been taken by local authorities and their partners has been extremely positive and we hope that this will continue into phase two and beyond. The collaborative approach adopted by providers has also allowed for improved coordination and better use of resources across the sector. We would want this to continue into the future, and all partners should make clear what support they may need for this collaborative approach to be sustained in the long term.
- 4.2.15 **Positive changes and learning:** There have been positive changes made in response to COVID-19 and we would want these positives to be incorporated into longer term practices. For instance, we have heard that some people have welcomed the use of digital technology as a means of accessing support, as they felt it had enabled them to be more open by having some level of distance between themselves and the support provider. In addition, we have welcomed the collaborative and inclusive demonstrated by the Welsh Government and local authorities. Everyone needs to maintain responsiveness to future outbreaks and work with the sector on how they can work mitigate and shield against the worst impacts of COVID-19 for those experiencing homelessness and trauma. It is vital that we take the learning from our response to the first outbreak of COVID-19, and ensure this is applied to any future outbreaks or subsequent waves.

Chartered Institute of Housing Cymru
4 Purbeck House, Lambourne Crescent
Cardiff Business Park, Llanishen
Cardiff
CF14 5GJ



**Chartered
Institute of
Housing**
Cymru

COVID-19 and its impact

CIH Cymru inquiry response

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: www.cih.org

In Wales, we aim to provide a professional and impartial voice for housing across all sectors to emphasise the particular context of housing in Wales and to work with organisations to identify housing solutions.

For further information on this response please contact
[REDACTED]

General Comments

CIH Cymru welcomes the opportunity to provide information to The Equality, Local Government and Communities Committee inquiry into COVID-19 and its impact.

Our response is informed by feedback from our members, our knowledge of the housing industry and expertise from our policy and practice teams.

CIH Cymru supports the development of Welsh policies, practices and legislation that aim to address the key housing challenges we face, to improve standards and supply, promote community cohesion, tackle poverty and promote equality. We promote a *one housing system* approach that:

- places the delivery of additional affordable housing at the top of national, regional and local strategies as a primary method of tackling the housing crisis;
- secures investment to ensure the high and sustainable quality of all homes in a sustainable framework;
- improves standards and develops the consumer voice within the private rented sector
- promotes the concept of housing led regeneration to capture the added value that housing brings in terms of economic, social and environmental outcomes;
- recognises that meeting the housing needs of our communities is a key aspect of tackling inequality and poverty;
- ensures that there are properly resourced support services in place to prevent homelessness and protect the most vulnerable;
- uses current and potential legislative and financial powers to intervene in housing markets and benefit schemes;
- promotes consumer rights & tenant involvement;
- and supports the continued professional development of housing practitioners.

1. Introduction

- 1.1 We will ostensibly be providing evidence to this inquiry on how Covid-19 has impacted the housing sector but our evidence will occasionally cross into other policy areas covered by this inquiry due to the cross-cutting nature of the work of housing professionals and the housing sector in Wales, e.g. Local Government, tackling poverty and human rights
- 1.2 The Covid-19 crisis gives us the opportunity to start thinking differently and more radically, particularly in terms of the value society places on roles and sectors that perhaps didn't get the recognition they deserved in "normal times".
- 1.3 The Welsh Government has, in CIH Cymru's view, made an impressive start to dealing with the issues around housing that the crisis has created, working closely with housing associations, local authorities, private landlords and other housing organisations to ensure that the advice and resource is getting to the right places.

- 1.4 More than 500 homeless people in Wales were found accommodation in the first six weeks of the lockdown, allowing them to isolate and observe social distancing rules. Advice has quickly been given to organisations providing the housing sector with support to ensure they are equipped to help those with complex needs through this crisis. Decisions were quickly taken to protect tenants and reassure them that no evictions would take place during the crisis period – just a few of the issues that the housing sector and the Welsh Government have addressed in collaboration.
- 1.5 But it is clearly evident that a lack of affordable and sustainable housing options for many created a crisis pinch point – how can you isolate yourself from a worldwide pandemic without that most basic of human rights, a sustainable place to call home? It is clear that we need to rethink the concept of homes/housing. We must move away from seeing housing as simply bricks and mortar, or simply as a capital asset. Home is where well-being, both mental and physical, begins. This pandemic, like the aftermath of the two world wars in the 20th Century, has highlighted that housing is, at core, a public health issue – it has to be central to the creation of a healthy, happy and cohesive society. We embarked on huge publicly funded house building programmes after the two wars – the Addison Act and the Atlee Government building programme - we must respond in a similar way to Covid-19.
- 1.6 And we believe that that process must start with the full incorporation into Welsh Law of the right to adequate housing. At a fundamental level, CIH Cymru, along with partner organisations Shelter Cymru and Tai Pawb, believe that the case to fully incorporate the Right to Adequate Housing (as defined in the UN’s International Covenant on Economic, Social and Cultural Rights [ICESCR])¹ into Welsh law was compelling prior to the Covid-19 pandemic and together have been campaigning for the past 18 months for that to happen². However, given the housing crisis and the number of people experiencing homelessness, the Coronavirus has shone an even brighter spotlight on the issue.
- 1.7 The Welsh Government has committed to incorporating elements of that right into the draft Local Government & Elections (Wales) Bill which is currently going through scrutiny in the Assembly. Moreover, this committee has recommended that the Welsh Government put that “Due Regard” element of the right onto the face of the Bill.
- 1.8 Covid-19 has shone a spotlight on the fact that we have the ability to accommodate everyone in our communities if we put our minds to it, achieving in six weeks what we have been talking about for decades, effectively eradicating rough sleeping – but it shouldn’t just be for the duration of a worldwide pandemic!
- 1.9 Radical changes will need to take place, not least an even bigger requirement post-Covid to increase the supply of housing at social rent, as well as a sintermediate. That approach will need to be carved out in collaboration between housing associations, local authorities, volume housebuilders, the Private Rented Sector and the Welsh Government.
- 1.10 But the starting point of those discussions must now surely be that the principle of a “Right to Adequate Housing” for all should be hardwired into the soul of our society through legislation. We need to believe that it is a right and to ensure that we act upon it.
- 1.11 **CIH Cymru calls on the Committee to consider recommending that legislation is brought forward to fully incorporate the Right to Adequate Housing into Welsh law.**

¹ https://www.ohchr.org/documents/publications/fs21_rev_1_housing_en.pdf

² <https://www.taipawb.org/wp-content/uploads/2019/06/RightToHousing-Full-ENG.pdf>

2. Priority Need

- 2.1 This Committee has previously made the case for the abolition of “Priority Need” in a report published in April 2018.
- 2.2 The Welsh Government took a significant step on April 28 this year to, in effect, suspend priority need for the duration of the Covid-19 crisis period by issuing guidance that places all rough sleepers, and those in danger of rough sleeping, into Priority Need.
- 2.3 We would urge the Committee to reiterate its support for abolition as soon as possible to ensure that we don’t return to the “old normal” where those sleeping rough are not considered a priority need when allocating accommodation.
- 2.4 Under the Housing Wales (Act 2014) certain groups of people are identified as ‘Priority Need’ and they have an enhanced right to accommodation. Priority need groups include:
- Pregnant women
 - People with dependent children
 - People who are vulnerable as a result of some special reason such as old age or disability
 - Care leavers aged 18 to 21
 - Armed Forces veterans
 - If a homeless person can demonstrate that they are in a priority need group, they have a right to interim accommodation as well as a right to settled accommodation.
 - If people aren’t found to be in priority need, the council will still help to prevent or relieve their homelessness – but the council doesn’t have to give them interim accommodation. And if the help isn’t successful, there is no right to settled accommodation.
- 2.5 In a significant step from the Welsh Government on the 28 April, new guidance³ from the Housing Minister was issued to local authorities. In effect, it means that that all those who have been emergency housed during the Covid-19 pandemic, or who are in danger of being forced to sleep rough should be considered Priority Need.

In her letter the Minister wrote:

“As Minister for Housing and Local Government I am clear that no one should be without suitable accommodation and support during this pandemic. This includes those, who are currently sleeping rough, and those who are under threat of having to do so, for example, those who are leaving prisons or other institutions without any accommodation to go to, and those who are precariously reliant on others such as people sofa surfing or in unsuitable temporary accommodation.”

The Ministers advice effectively ends priority need for those experiencing homelessness during the Covid-19 pandemic but the Minister went further:

“I hope that some of the accommodation provided in response to this pandemic will become more permanent, so that those people who seek accommodation now, have accommodation available in the longer term. Where this is not possible I hope we can continue the collaborative and creative working to find suitable alternative accommodation for individuals such that this becomes their first step on a journey to permanent housing.”

- 2.6 **We would urge the Committee to recommend the immediate abolition of “Priority Need”**

³ https://gov.wales/sites/default/files/publications/2020-04/guidance-for-local-authorities-in-supporting-people-sleeping-rough-covid-19_0.pdf

3. Health and Housing

- 3.1 Working in collaboration is enshrined in legislation in Wales, yet there are still times when organisations work individually to meet their own objectives and fail to liaise between partners in housing, health and social care. Strong partnerships enable organisations to deliver effective, flexible and safe care for communities at a time of crisis such as the COVID 19 pandemic.
- 3.2 In 2019 the Tyfu Tai Cymru project (part of CIHC) partnered with the UK Collaborative Centre for Housing Evidence (CaCHE) to find examples of services that have been designed and delivered jointly between health, housing and social care. Our [report](#) includes an evidence-based model of six principles which underpin robust and enduring partnerships based on the interviews we held with partnerships across Wales. We launched “Good Health brought Home” in Autumn 2019 at the Public Health Wales conference.
- 3.3 The 15 projects we met were undertaking eight different models of delivery; joint health and housing hubs, social prescribing (eg exercise, group activities), support officers, targeted prevention work, bringing people into local healthcare, hospital discharge, umbrella structures, and health services people can access easily. All of these projects demonstrated partnership working at the centre of the services they were delivering.
- 3.4 Of particular relevance is the issue of safe discharge which is always pressing for the health service, and this has increased with the hospital focus on decreasing the risk of infection spreading by keeping as many people out of wards as possible. Safe discharge relies on people being able to access housing which has limited hazards, is warm and safe (or care-schemes such as rehabilitation, ‘step-down’).
- 3.5 The six principles are: shared analysis of issues, person-centred, leadership, joint budgets, shared interpretation of legislation and recognition of power imbalances between partners.
- 3.6 **We recommend the Committee analyse the extent to which partnerships have been able to withstand the pressure of the COVID 19 crisis, including the role that bodies such as the Regional Partnership Boards have been able to play.**

4 Personal Protective Equipment

- 4.1 Although evidence is still emerging, we know there has been issues accessing PPE for all sectors, including care provided by housing organisations. Frontline housing professionals working in care environments, whether that be in care homes, supported housing, sheltered housing or extra care environments for the elderly, have felt bottom of the list in terms of accessing PPE supplies. They are frontline care and support staff, often on low wages, who provide an invaluable social service. Whilst it is right that PPE was/is going to frontline health service staff the situation shines a bright light on the lack of value we, as a society, place in the valuable contribution that these workers provide in terms of caring for some of the most vulnerable in our communities. Moving forward we must ensure that sufficient PPE is supplied to staff working in these environments. A shortage of PPE has also impacted on and limited access to homes by Care & Repair staff as well as those checking safety issues such as gas safety checks.
- 4.2 Moving out of lockdown, frontline housing staff in all settings – whether care environments, supported housing on general need – are more likely than most to come into face-to-face contact with tenants. We must ensure general supply of PPE in Wales is able to cope with demand.

5 Housing Professionals

- 5.1 The role of housing professionals from all housing tenures as landlords has developed in 2 diametrically opposite ways (they already had these roles but this will have increased)
- Caring for people who are deemed “vulnerable” – delivering essentials such as shopping, prescriptions, regular contact over phone with people who are isolated
 - Regulation of tenants who have been non-compliant with COVID legislation has been an issue, along with management of ASB.
- 5.2 As we are likely to develop apps for track and trace COVID cases, we would ask the committee to consider the extent to which housing professionals will be asked to undertake either of the above roles (carer or enforcer) and how we balance responsibility and public health with expectations of people working in front-line services such as housing.
- 5.3 Tyfu Tai Cymru survey in early 2020 (to be published) found that housing professionals in Local Authorities are predominantly driven by “helping people” (over 60% of 51 respondents). As we celebrate the people whose work is keeping others healthy during a pandemic, we should have wider recognition of this motivation in staff from Local Authorities.

6. Economic

- 6.1 Expected economic impacts – expectations that there will be an increase in evictions because of loss of income for many people. Welsh Government very clear that they want to step in proactively to avoid increasing homelessness as we come out of lockdown.
- 6.2 Private rented sector likely to be affected – landlords are concerned about meeting their costs if tenants are not paying rent.
- 6.3 Major increase in number of people applying for universal credit. Research published by CAB Cymru⁴ on 20 April 2020 found that
- Around 250,000 people in Wales (17% of the total workforce) have already seen their hours cut, been laid off, or made redundant as a result of the Coronavirus outbreak.
 - Four out of 10 (42%) people have lost household income because of this crisis, with nearly one in 14 (7%) losing 80% or more of their household income.
 - One in four people (25 %) have applied or expect to apply for benefits as a result of the coronavirus outbreak.
- 6.4 It is clear we do not yet know the long-term impact this will have on our economy, but housing plays a central role in providing security and safety for communities as well as employment.
- 6.5 As all Governments seek to find ways to rebuild economies that have been badly hit by the COVID 19 pandemic and resulting lockdown we urge Welsh Government to consider the opportunities in setting far reaching targets for the supply of more and better affordable housing. This would create badly needed homes, employment and skills opportunities. Any stimulus packages should look to have housebuilding at the heart and follow the example of the announcement of the Land Release Fund⁵ that will unlock public sector owned land

⁴ <https://www.citizensadvice.org.uk/about-us/policy/policy-research-topics/citizens-advice-cymru-wales-policy-research/new-figures-from-citizens-advice-cymru-lay-bare-the-scale-of-financial-crisis-caused-by-coronavirus-in-wales/>

⁵ https://gov.wales/written-statement-land-release-fund?_ga=2.52811691.243690322.1588783446-1185541978.1547027313

assets to deliver affordable and social housing. Housing can also provide the focal point for the further development of the foundational/circular economy model.

6.6 Combined with economic drivers is the need to achieve the goals of decarbonisation as set out in Prosperity for All (Low Carbon Delivery Plan 2019)⁶

6.7 We recommend the Committee recognise the central role that providing sustainable, affordable and accessible homes for all (including building new homes) can be a driver for economic rehabilitation

7. Homelessness/Rough Sleeping

7.1 The immediate and obvious priority is to ensure that those 'taken off' the streets are not returned to them. Essentially, what is required is a phased plan to relocate people out of hotel and similar accommodation into longer-term secure accommodation, in ways that recognise their support needs (where they have them).

This will require arrangements to ensure that hotel accommodation is not stopped overnight, it will require changes to ensure that all those to be relocated can access housing benefit/universal credit, and it will require administrative support both within local authorities and within the voluntary groups whose expertise will also be required. Councils will need to commission the support arrangements for people who have been placed, to ensure that people at high risk are supported appropriately and effectively with clear pathways.

7.2 Many of these people will have complex needs that will require high levels of housing-related and other support services in order to maintain the tenancy.

7.3 We would urge the Welsh Government to ensure that the revenue support streams are in place to provide these services.

8. Private rented sector and evictions

8.1 The halting of evictions from the private and social rented sectors was a welcome initiative. The new rules mean an extended notice period for evictions and suspended eviction court action, with all court proceedings for evictions put on hold until at least 25 June 2020, regardless of when the landlord applied to court. The clear positive with this measure is that nobody loses their tenancies and becomes homeless during the crisis, but without genuine affordability post-lockdown, the key concern is the near-certainty that thousands of people will find themselves in spiralling rent arrears and/or on the streets.

8.2 Therefore, Welsh Government needs to consider, as a matter of urgency, how it will work with and support landlords in the PRS in the short and medium term to ensure we avoid a spike in the number of evictions

9. Welfare

9.1 Whilst welfare is not a devolved function, it has such a significant impact on affordability and homelessness that we believe it worth pointing the committee's attention to some of the Covid 19 -related impacts

⁶ https://gov.wales/sites/default/files/publications/2019-06/low-carbon-delivery-plan_1.pdf

- 9.2 **LHA rates** The changes to raise LHA rates to the 30th percentile is welcome and will definitely help some tenants - but there is a need to go further still. The governments original justification (2010) for reducing the LHA rate from the 50th to the 30th percentile was that broadly around 30 per cent of private tenants required help with HB across Great Britain - so there was, in theory, enough accommodation available at or below the LHA rate for people who needed to rely on benefit.
- 9.3 Many of those claiming benefits during the pandemic will be people who never expected that they would have to rely on welfare to help pay their rent and who have entered into contracts with rents that reflect the fact that they previously had no difficulty meeting the payments. Further, the coverage of 30 per cent of the market fails to take account of the uneven distribution of private renters. The LHA covers 30 per cent of each rental market area in the UK, but the distribution of private renting claimants across the country isn't uniform - so in some areas the number of private renter households claiming may exceed 30 per cent of the supply (for the appropriate category of dwelling).
- 9.4 Single people aged under 35 (unless they fall within some of the very limited exemptions) will only be entitled to the shared accommodation rate if they live in a (one bedroom) self-contained dwelling. Again, there is a strong case that the arguments justifying this just are not appropriate during the outbreak. As with any other type of household, many of these will be people claiming for the first time, who entered contracts without ever expecting to have to rely on social security. We don't yet know the how many of the new claims are from private renters but the total number from all household types has dwarfed all previous figures in the post war period, including the last two most serious recessions in 1991 and 2009.
- 9.5 The daily onflow of new universal credit claimants - these are people registering to make a new claim (not all of these will be entitled to UC and of those that are only some be private renters). These figures show that the daily on-flow rose steeply after 16 March (the day the UK Government advised against all non-essential contact and travel) from around 9,000 households a day to a peak of 75,000 households on 29th March and then fell steeply again but by the end of April it was still running at around 21,000 new households per day.
- 9.6 The difference between the one bedroom self-contained and shared rate is substantial. There are 22 broad rental market areas (BRMAs) covering Wales, the median difference between the one bed and shared rate is £19.36 per week (circa £84 a month), in 6 out of 22 BRMAs the difference is over £30.00 per week, and in the two highest, Swansea and Cardiff, the difference is £41.06 and £49.71 pw respectively.
- 9.7 Although LHA rates have been raised to the 30th percentile, HB subsidy paid to local authority for HB payments is still based on the January 2011 LHA rates – and although these were based on the 50th percentile in many cases, the 2020 30th percentile rates will have overtaken them. These rates were also subject to a cap of £375 per week which is lower than the new maximum rates for three and four bedroom accommodation.
- 9.8 **Universal credit – five-week wait**
The five-week wait has been the most problematic and reputation-damaging feature of UC. Moreover, it has arguably been the biggest single cause of the dramatic rise in food bank use since 2010. It remains unchanged.
- 9.9 Claimants can access a payment on account (UC advance) but this is repayable over 12 months and merely extends the period of financial stress. And as time spent on benefit increases so do budgeting pressures (e.g. replacement of large essential items). This quickest and simplest solution would be to turn UC advances into a non-repayable grant at least for the first three months (while the work-related conditions are suspended).
- 9.10 **Benefit cap.**

The raising of the LHA rates won't help anyone who is subject to the benefit cap (and in some cases others will benefit from only part of the increase – up to the cap, if not previously capped). The cap was lowered in November 2016 and hasn't been raised since – which means that April 2020 uprating (including the extra £20 per week) has eaten into the amount that is left over for housing costs. The amount for the cap outside London is just £385 per week.

- 9.11 The Westminster Government's justification for introducing the cap was that those with higher living costs shouldn't be relying on welfare and should be looking for work, is difficult to reconcile with the suspension of the work-related conditions during the coronavirus outbreak. The fact that people are no longer in work, are unable to find work or have reduced income, cannot be said to be due to any moral failing.
- 9.12 Those who have just lost their job aren't subject to the cap during the first nine months (the 'grace period') but that doesn't apply to anyone who has earned less than £569 per month in the previous 12 months. Nor would it help, for example a woman fleeing domestic violence with or without her children if she had been without earnings herself (for example due to controlling or coercive behaviour). In these situations, the cap would apply immediately. There is no specific exemption for domestic abuse survivors unless that person falls under one of the (unrelated) exemptions e.g. due receipt of a disability benefit or being pension age. Survivors living in a refuge, hostel or similar supported housing are protected (their HB does not count towards the cap but this rule does not apply to any other kind of accommodation).
- 9.13 The majority of those affected by the cap are single (81.4%) and of those 92.9% are women this rises to 97.6% of single claimants with children. It should be noted that although a child who was born as result of non-consensual conception isn't towards the two child limit, the overall result is that the higher allowance simply means that the woman is more likely to be capped.

10. Social/Affordable Housing supply

- 10.1 It is difficult to know at this stage what the effect will be on the housing market, on rents more generally. Rents may fall in line with people's ability to pay, or they might rise as landlords exit the market and the supply shrinks. Moreover, there may well be a rise in the number of homeowners unable to pay their mortgage and end up facing repossession.
- 10.2 We would urge the Welsh Government to take a holistic one-housing system response to whatever the post-Covid landscape throws at us, to ensure that a wide range of housing options are available in order to soak up a possible short to medium term spike in housing need.
- 10.3 Central to its strategy must be the scaling up, at pace, of the development of social and affordable housing. The current Government has been committed to building more affordable homes with a target of 20,000 new homes by the end of this Welsh parliament term in 2021. The housing sector has committed to this and is on course to meet the target. Prior to the Covid-19 crisis, the government had also committed to scaling up, at increased pace, the development of social and affordable housing, having committed to the implementation of all the recommendations (apart from one on Help to Buy) of the "Independent Review of Affordable Housing Supply"⁷ which was published in May 2019. CIH Cymru has been supporting Welsh Government in the delivery of those recommendations, in particular hosting the workstream on the scaling up of council house building.

⁷ https://gov.wales/sites/default/files/publications/2019-04/independent-review-of-affordable-housing-supply-report_0.pdf

- 10.4 However, the likelihood is that the demand for homes at social and intermediate rent will increase as the economic impact of Covid-19 begins to kick in, exacerbating the pre-Covid landscape where demand was already overwhelmingly outstripping supply. Therefore, Welsh Government needs to be even more ambitious, working with housing organisations to develop radical new approaches to balance both immediate short-term demand as well as the longer-term requirements.
- 10.5 **The home has come into sharp focus during this pandemic. Not least that we cannot isolate ourselves against a global pandemic unless everyone of us has a sustainable housing option. We, as a wider society, need to reassess what we believe housing and the home to be. Clearly it is at the centre of well-being, both from a physical and mental health perspective, and should be viewed more as the starting point of creating cohesive, healthy, happy, productive and sustainable communities. We need to recognise that and ensure that investment is allocated accordingly.**

Julie James MS

Minister for Housing & Local Government

Welsh Government

Cathays Park 2

Cardiff

CF10 3NQ.

1 June, 2020

Dear Minister,



Protect tenants from arrears, evictions and homelessness – An urgent call to Welsh Government for action during and after the coronavirus epidemic

The Welsh and UK Governments have taken welcome action to protect tenants and help them meet their housing costs in the current crisis. Sustaining many people's incomes through the furlough scheme and other measures, and calling a halt to evictions has created a temporary respite for tenants. This provides valuable time in which to find a 'post-Covid' solution to the potential crisis that will occur if there is a substantial spike in rent arrears and evictions when the current protections end.

The Chartered Institute of Housing (CIH) Cymru, working with barrister Liz Davies, has prepared a detailed set of proposals to avert such a crisis. They are described in this paper and set out in detail in the accompanying table.

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Why is a 'post-Covid' solution needed?

Finding a longer-term solution and taking early steps to implement it are urgent for several reasons. First, for the 350,000 households¹ who are tenants of private or social landlords in Wales, a key part of the hardship and suffering during the crisis has been the struggle to pay their rent and worrying if they will be able to keep their home. If society and the economy are to recover from the crisis it is vital that these fears are allayed quickly and thoroughly.

Second, local authorities' and social landlords' resources for dealing with homelessness were stretched before the epidemic, evidenced by a steady growth in the use of temporary accommodation, and could be overwhelmed if there is a sudden growth in evictions due to rent arrears. This is readily apparent from pre-crisis figures. Loss of a home through rent arrears accounted for fewer than 18 per cent of evictions². If even a small proportion of rented households in Wales were to be evicted in a short period due to arrears, a system which is already stretched could be totally overwhelmed.

¹ <https://statswales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-year-tenure>

² https://gov.wales/sites/default/files/statistics-and-research/2019-07/understanding-social-housing-evictions-in-wales_0.pdf

Third, while it is impossible to assess the potential scale of the problem it is easy to see that it could be huge. This is because:

- Around 250,000 people in Wales (17% of the total workforce) have already seen their hours cut, been laid off, or made redundant as a result of the Coronavirus outbreak.(CAB Cymru on 20 April 2020)³
- Four out of 10 (42%) people have lost household income because of this crisis, with nearly one in 14 (7%) losing 80% or more of their household income.(CAB Cymru on 20 April 2020)
- One in four people (25 %) have applied or expect to apply for benefits as a result of the coronavirus outbreak. (CAB Cymru on 20 April 2020)
- UC claims have increased substantially in Wales - March (the day the UK Government advised against all non-essential contact and travel) from around 9,000 households a day to a peak of 75,000 households on 29th March and then fell steeply again but by the end of April it was still running at around 21,000 new households per day
- Private renters in Wales pay an average 29 per cent of their income (after housing benefit) in rents.⁴

Despite the Welsh and UK government's measures, millions of households therefore have reason to fear a financial cliff edge when the protections come to an end.

Fourth, current measures still leave significant gaps in the protection offered. These include:

- Universal credit's five-week waiting period and other delays in accessing it allow arrears to build up.
- LHA rates, though now improved, still fall short of covering many rents.⁵
- Single person households are likely to be at high risk because of:
 - lower standard allowances in UC, for those under 25
 - the absence of a UC work allowance (earned income disregards)
 - LHA rates for under 35s based on shared accommodation even for those living in self-contained dwellings
 - lower minimum age rates for people aged under 25
- UC is not available to all those at risk, because of:
 - income limits that relate to pre-crisis conditions
 - some workers not being eligible for UC if they lose their jobs.

The furlough scheme helps to sustain incomes but has a shortfall of 20 per cent if not made good by employers. When the scheme ends people may lose jobs, have lower earnings than before or have used up their savings. Protection against eviction currently ends in June and even if it is extended landlords are still able to service notices to start the process if arrears accrue, resulting in a potentially massive number of eviction actions within a short period.

Fifth, the burden cannot simply be put onto landlords. While they can be expected to play a role, the diverse nature of landlords means that blanket solutions (such as a freeze on all rent payments during the crisis) are not practicable: they could lead to defaults on mortgages and enforced sales which could deplete the sector just when tenancies are most needed.

³ <https://www.citizensadvice.org.uk/about-us/policy/policy-research-topics/citizens-advice-cymru-wales-policy-research/new-figures-from-citizens-advice-cymru-lay-bare-the-scale-of-financial-crisis-caused-by-coronavirus-in-wales/>

⁴ ONS - UK private rented sector: 2018

⁵ CIH (2018) *Missing the Target: Is targeted affordability funding doing its job?*

What are the main aims of a ‘post-Covid’ solution?

The epidemic has exposed the fragility of the private rented sector, in particular, which is ill-equipped to handle the crisis. Ultimately, the solutions must include more genuinely affordable housing to rent, and reform of the private rented sector to provide more security for tenants. But in the medium term, a ‘post-Covid’ solution is required which addresses the scale of the problem just described.

The key requirements of such a solution are that it:

- is as comprehensive as possible, covering all the main groups affected in the crisis and filling the gaps in current initiatives
- minimises evictions and hence the burden of homelessness on tenants and on local authorities
- builds on the steps already taken and makes use of the existing support mechanisms – principally universal credit – if possible without requiring new ones to be developed
- leaves neither landlords nor tenants with intractable financial problems resulting solely from the current crisis
- helps restore or build sustainability in the rented sectors (private and social).

What is CIH Cymru’s ‘post-Covid’ solution?

The table annexed to this paper sets out our proposals for a ‘post-Covid’ solution that aims to meet these requirements. The key points are these:

- **Evictions – temporary protection.** Ban to be extended until evictions can take place safely and the pre-action protocol is in place.
- **Evictions – post-Covid.** Ensure that Welsh Parliament approval of [Renting Homes \(Amendment\) \(Wales\) Bill](#) remains a priority in order to end so-called “No-Fault evictions”.
- **Arrears payments.** Require that payment plans for Covid-related arrears will not result in eviction provided the tenant agrees with and complies with the plan over a timescale of up to two years.
- **Reforms to universal credit.** End 5-week wait; temporary suspension of the benefit cap and the two-child limit; increase LHA to 50th percentile of rents for a limited period; reinstate three month protection for claimants who could afford their rent when they entered into their agreement (available in HB but not UC); end ‘shared accommodation rate’ for under 35s.
- **Rent arrears outside scope of UC.** Increase emergency fund for discretionary housing payments and ensure they are more widely available; tenants to be able to repay arrears over two years – no eviction possible if comply with repayment plan.
- **access to UC because of immigration status.** One-year lifting of ‘no recourse to public funds’ and other restrictions on claiming benefits.
- **Landlords’ loss of rental income.** Similar interest-free loan scheme to that proposed in Scotland; landlords given mortgage holidays on rented properties to pass relief onto tenants.
- **LAs and HAs lose rent income.** Consider one-off payments to stabilise landlord accounts where these can be shown to be needed.

- **Housing Support Grant** - A key part of preventing homelessness and evictions is through services such as those funded by Housing Support Grant. which should continue to be protected in future budgets and provision made for further emergency injection of funds?

Please see the table for more details and further proposals not included in this short summary.

Yours sincerely,

Matt Dicks,

A handwritten signature in black ink, appearing to read 'M. Dicks', written in a cursive style.

Director, CIH Cymru

C.C. Emma Williams – Director of Housing & Regeneration

Table: Measures needed to avoid post-lockdown evictions, deal with rent arrears and avoid a substantial spike in homelessness

Problem	Measures already taken by government	What more is needed now?	What more is needed after lockdown?
Evictions			
Evictions – tenants threatened with homelessness <u>during</u> epidemic	Temporary halt to evictions (until June 25) by staying all possession claims and bailiffs’ warrants. Extension of notice periods to 3 months (from 2 months for s.21 and 4 weeks for other grounds)	Temporary ban to be extended until evictions can take place safely, the pre-action protocol is in place and time has been allowed for landlords/tenants to agree plans for paying arrears; temporary ban to include tenancies without security of tenure (e.g. introductory tenancies)	Advice during possession action to check if tenant entitled to any benefit to help with arrears
Evictions – sudden increase when the temporary ban on possession proceedings is lifted, potentially leading to huge homelessness increase and unrealistic demands on local authorities	Possible ‘pre-action protocol for possession claims brought by private landlords’ to give some protection after that date. Difficulty is that non-compliance with protocol does not prevent possession order being made.	<p>If possession claims are resumed before the end of lockdown, suspend use of s.21 and mandatory ground 8.</p> <p>Legislate to require private landlords and HAs to use only discretionary grounds 10 or 11 for rent arrears, giving courts the flexibility either to decide that possession is not reasonable, or to make a suspended order so that the tenant repays the arrears on terms and remains in possession</p> <p>Provide guidance on what are and are not Covid-related arrears, including a start date and end date, and on a recommended two-year period over which arrears can be paid.</p> <p>Pre-action protocol to include reasonable repayment arrangements and time periods, as well as a referral process to local authorities when possession action begins.</p> <p>LA housing options services should have advisors available at court to pick up people threatened with homelessness</p>	<p>Ensure that Welsh Parliament approval of Renting Homes (Amendment) (Wales) Bill remains a priority in order to provide more secure tenancies and to ensure that the legislation takes effect before epidemic ends.</p> <p>Put a ban on evictions that result solely from Covid-related arrears which have arisen since March 2020 until a defined end date, unless tenants fail to agree a plan to repay arrears within two years.¹</p> <p>Specifically require local housing authorities under their relief</p>

Problem	Measures already taken by government	What more is needed now?	What more is needed after lockdown?
		<p>Legal help should be fully funded; maintain the housing possession duty scheme and extend to all courts hearing possession claims. Provide funding for legal advice on welfare benefits so as to reduce rent arrears.</p> <p>LAs to review temporary accommodation requirements and prepare; additional funding needed. Government to enable private sector leasing, to make more effective provision.</p>	<p>duty to take practical steps to help those unable to comply with repayment plans to secure new accommodation</p> <p>Devise and implement a national plan to ensure there is a duty possession scheme in every county court</p> <p>Collect and monitor more granular statistics (e.g. household type, benefit status) of possession proceedings to better identify high risk groups and adjustments made to policy</p>
Rent arrears and access to universal credit			
<p>Rent arrears from loss of income not covered by present UC scheme - inadequate general allowances and a near six-year freeze put household budgets under severe stress reducing resilience to homelessness</p>	<p>Raised LHA rates to the bottom 30th percentile of local rents (but LHA has not recovered its original levels)</p> <p>Work-related conditions for UC suspended for three months during lockdown can be extended if required</p>	<p>Following reforms to UC should take effect asap:</p> <ul style="list-style-type: none"> • end 5-week wait • temporary suspension of the benefit cap and the 2-child limit • increase LHA to 50th percentile of rents for a limited period² • reinstate three-month rule (present in HB but not UC) when claiming help for first-time housing costs, based on actual rent before LHA starts to bite 	<p>Retain £20 increase going forward and conduct independent inquiry into the general adequacy of UC benefit levels with attention to resilience to homelessness</p> <p>Abolish minimum income floor or extend new business start-up exemption period to two or three years</p>

Problem	Measures already taken by government	What more is needed now?	What more is needed after lockdown?
Notional self-employed earnings rule (the 'minimum income floor') in UC assumes income that claimant does not have	<p>Eight-month suspension of minimum income floor</p> <p>Prisoners on temporary release allowed to claim UC/HB until 12 November (can be extended)</p> <p>£20 per week increase in standard allowance for 2020/21</p>		
<p>Rent arrears among single people under 35 who were not expecting to need UC</p> <p>Very low allowances for under 25s, the zero-rated work allowance and a lower minimum wage (especially apprentice rate) mean people in work get no support even at low levels of pay</p>	<p>No special measures – still affected by the 'shared accommodation rate' limit</p> <p>NB. Budget 2020 introduced limited new exemptions for under 25s (at risk of violence/trafficking, etc.) but these are not due to start until 2023/24</p>	<p>End shared accommodation rate for under 35s – they should get one-bed LHA rate unless actually sharing, when they should get 100% of rent³</p> <p>Temporary partial help for those with reduced earnings just outside UC</p>	<p>Permanently withdraw shared accommodation rate</p> <p>Align standard allowances for under 25s with general benefit rates</p> <p>Reinstate the work allowance for childless households</p>
Rent arrears from loss of income – but income level means	Discretionary Housing Payments (DHPs) can be used to help meet	Increase emergency fund for DHPs and ensure they are more widely available	Tenants to be able to repay arrears over two years – no

Problem	Measures already taken by government	What more is needed now?	What more is needed after lockdown?
still not eligible for UC even when strengthened as above	emergency gaps in housing costs.		eviction possible if comply with repayment plan
Rent arrears from loss of income – no access to UC because of immigration status	None except limited emergency funding via LAs	One-year lifting of NRPF and other restrictions on claiming benefits	End this aspect of the ‘hostile environment’ permanently
Loss of landlord income			
Landlords lose rent income; ability to sustain lettings at risk	Scotland – zero interest loans for small landlords; none in England; payment holiday for buy-to-let landlords whose tenants have lost income - landlords are expected to pass on this relief to their tenants	<p>Similar zero-interest loan scheme to that in Scotland, predicated on no evictions for arrears and agreed plan with tenants to pay arrears.</p> <p>Require any landlords given mortgage holidays on rented properties to pass relief onto tenants.</p>	No evictions for arrears reasons while arrears plan is in place and/or loan is in place and tenant is complying with plan
LAs and HAs lose rent income – social landlord finances destabilised, jeopardising tenant services and new investment	None except changes in UC noted above	Just as the government has made payments to LA General Funds, it should consider one-off payments to stabilise social landlord accounts where these can be shown to be needed.	Compensation scheme to apply to local authority HRAs and registered provider accounts for the year 2020/21 where the landlord can show that it has a potential serious deficit that cannot be eliminated by making other reasonable savings.

Problem	Measures already taken by government	What more is needed now?	What more is needed after lockdown?
			In long term, provide substantial funding to allow social landlords to invest in building safe, secure, social housing
Other tenure issues			
Asylum seekers lose supported accommodation once a decision is made on their case	Suspended evictions from Home Office asylum accommodation	Further delay to and then phasing of evictions to reduce the impact on homelessness services Request LAs to provide homelessness assistance now in cases where an asylum application is approved	
Starting a new tenancy is more difficult because of social-distancing requirements	Right to rent checks can be carried out by video calls, and applicants can send scanned documents by email or mobile app; but full checks on these tenancies are required when restrictions end	Suspend right to rent checks, and halt further roll out, completely for duration of the crisis - Do not require retrospective checks once crisis over.	Retain suspension and rollout until current pending Supreme Court case on discriminatory nature of checks is resolved

References relating to the table:

¹ Nearly Legal has pointed out that this requires reform to both s.8, HA 1988 (especially Ground 8, although probably best extended to the other rent arrears grounds) and s.21, HA 1988 (otherwise landlords will just use s.21 to evict and then seek to cut their losses on the unpaid rent by deductions from the deposit). It would be important to extend the same protections to tenants of local authorities and amend the rent arrears grounds under the HA 1985. And, although they are now rare, Rent Act 1977 tenants should be protected in the same way (see <https://nearlylegal.co.uk/2020/05/a-five-point-plan/>).

² The 50th percentile rent is on average around 9% higher than the 30th percentile rent, the cost would be something less than that because the award if based on the actual rent if that is lower than the LHA figure – and also because in some areas (but not very many) the LHA has reached the maximum figure (and presumably would do so in more areas if it was raised to the 50th).

³ Under-35s are one of the groups where there could be a huge increase in possession cases as things stand because the median gap between UC payments and rent is £37 per week and in many cases a lot higher. Resolution Foundation work ('Risky Business', April 2020) shows that 16-24 year-olds are most at risk of losing their job and least able to do their job from home: "Overall, 2.9 million 16-34-year-olds are in the 'shutdown sectors' group, which comprises notoriously low-paid work. Four-in-ten of those working in retail and whole get less than the real Living Wage."



NATIONAL RESIDENTIAL
LANDLORDS ASSOCIATION

248A City Road
Cardiff CF10 4RG

0300 131 6400

info@nrla.org.uk

www.nrla.org.uk

27/05/2020

Equality, Local Government and Communities Committee
Welsh Parliament
Cardiff
CF99 1SN

Re: Inquiry into COVID-19 and its impact on matters relating to the Equality, Local Government and Communities Committee's remit

Dear Sir / Madam,

Thank you for the opportunity to respond to the above consultation. The National Residential Landlords Association (NRLA) are grateful for this opportunity to give our views as an organisation on this important call for evidence for the Equality, Local Government and Communities Committee into the impact of Covid-19.

We have structured our response into the subject remit areas of the committee accordingly:

- Local government;
- Housing;
- Equalities;
- Tackling poverty;
- Human rights; and
- Any other issues within the committee's portfolio.

We have also included data from our latest survey which chiefly looked at the impact Covid-19 has had on landlords and the sector as well as three case studies where landlords have supported tenants during the pandemic. You will find the survey data under appendix a and the case studies under appendix b.

Local Government

The NRLA recognise that local government in Wales was at the forefront in tackling Covid-19, developing community resilience and in working to develop a coherent and partnership led approach to supporting people during the pandemic.

Council Tax support for landlords with void properties

The impact of Covid-19 will cause significant financial pressure on local government and many of their services that they provide have been reprioritised. The NRLA would be supportive of additional financial support for local authorities in order to support them not only in tackling Covid-19, but to support the many services they perform thereafter.

While recognising local government's financial challenges, we would hope that greater core funding would allow local authorities to be more flexible on their policies towards empty properties and in Council Tax support for landlords operating in the Private Rented Sector. Accordingly, we would like to see Council tax waived on hard to rent properties or those that are left void due to the Coronavirus. We have had feedback from some of our members who have expressed financial hardship as there properties have been left empty during the Coronavirus, which has been especially problematic for Houses of Multiple Occupation.

While the UK Government's support with mortgage holidays has been a relief for relatively few landlords, some of our members have paid off their rental property mortgages but are still heavily reliant on rental income. Any flexibility on Council Tax would significantly help landlords.

It should also be noted that the payment of rent in many contracts, also covers Council Tax. This is commonly the case for HMOs which is an increasingly difficult factor for landlords which is further evidence of need for council tax support.

Other financial support

Local Government was responsible for much of the distribution of the UK and Welsh Government financial support to individuals and businesses including business rate relief schemes, the Economic Resilience Fund and many other packages of support for small, medium and large businesses including the self-employed.

While these support packages should be welcomed in sustaining businesses across Wales, similar financial support was not applicable to most PRS landlords. This was primarily because HMRC do not recognise landlords as being self-employed and many landlords operate single-handedly and do not employ other people. Access to grants and loans would be welcome to ensure that landlords can continue to provide essential accommodation both during and after the pandemic. Current support for landlords appears to be chiefly centred around the welfare system. However, many landlords would be unfamiliar that this support is open to them and they have limitations in navigating the system for their personal support. Accordingly, we stress the importance of communicating with landlords and drawing to their attention support mechanisms that are currently in place. The NRLA is in a good place to act as a conduit and would be delighted to work in partnership with stakeholders to support landlords in this way.

Our recent survey data shows landlords are operating under incredibly difficult circumstances. If financial support is not open to them like it is for people working in other sectors, then we are very concerned that landlords will consider selling their properties which will further restrict housing options particularly for the low waged and vulnerable groups.

Housing

Paying rent

Right from the start of the pandemic, we have been clear that tenants who are struggling financially to pay their rent, should speak to their landlord as soon as possible. In turn, we have recommended to our members that it is in their and their tenants' best interest if they adopt a flexible and sympathetic attitude towards the payment of rent, should their tenants be struggling. This could include temporarily reducing rents or giving tenants more time to pay rents over a period. However, we would like to make it clear that, where tenants can afford to, rent should still be paid during this difficult time and that this message should be made clear from stakeholders.

Standards and licensing

Local Government plays an important role in ensuring that the legal standards for the PRS are adhered to a sufficient standard. During the pandemic, our members informed us that finding suitably qualified contractors and resources has become increasingly problematic as a result of the lockdown measures. With this in mind, we would welcome a six-month extension for the validity of all gas, energy performance and, for HMO properties, electrical safety certificates, in line with the similar policy on inspection of MOT certificates for motor vehicles.

We are pleased that our requests to pause new local authority licensing schemes has been agreed and that landlords will not be penalised if they are unable to comply with non-essential licensing requirements at this time.

Possession

While we fully understand that unnecessary moves must be avoided at this time and have accepted the temporary restrictions on eviction, we reinforce our view that landlords require possession to their properties in limited circumstances. This could include possession from the tenant where they have engaged in criminal or anti-social behaviour, including not adhering to any measures implemented to reduce the spread of the virus including social distancing measures. Additionally, a landlord may require possession of a property to live in themselves to care for a vulnerable family member as one such possibility.

Equalities

Support for older tenants and those with disabilities

According to the Chartered Institute of Housing, evidence suggests that an increasingly high number of older people and people living with disabilities are accessing the PRS.

Many of these tenants will be particularly vulnerable to Covid-19 and will be shielding from the virus.

We have many examples of our members who have adapted properties to accommodate for the needs of vulnerable tenants. However, we believe that more help will be required for landlords to support vulnerable tenants especially as they are likely to be spending an increased amount of time at the home.

For PRS landlords to be able to accommodate vulnerable tenants who require adaptations to the home, more financial support will be required for landlords to both adapt the home and to remove adaptations should the tenant leave the property.

In order to support vulnerable people with housing options including within the PRS, it would be beneficial if landlords with suitably adapted homes could voluntarily register their property with local authorities, who in turn could recommend vulnerable people into suitable accommodation within the PRS.

Support for tenants living with Autistic Spectrum Disorder (ASD)

The NRLA welcome the relaxation on guidelines for exercise for people living with certain conditions including ASD. We would welcome additional support and guidelines for landlords who have tenants who live with ASD as we recognise the current restrictions are particularly difficult for people with these conditions.

We also received casework from one of our members where a tenant was having difficulty with their young son who had been diagnosed with Attention Deficit Hyperactivity Disorder Syndrome (ADHD) and their behaviour had been reported by neighbours. We understand that many parents have children with certain conditions would ordinarily be living in supported accommodation, and as a result of the virus have been forced to live at home due to closure of residential units.

Tackling poverty

Welfare reform

The NRLA recognise that reform of the benefits and welfare system is a good opportunity to tackle poverty. We further recognise that much of the welfare system is reserved to the UK Government and not within the remit of the Welsh Government. We would recommend that the Welsh Government continues to engage with the UK Government on opportunities to end the five-week waiting time for receipt of the initial payment of Universal Credit, where the delay is putting many vulnerable people into debt. We appreciate that for some time, the UK Government have issued advance payments, however, this puts vulnerable people into further debt.

The NRLA liaise closely with the Department of Work and Pensions (DWP) in discussing policy implications of Universal Credit and its impact on the PRS. We will not use this opportunity to highlight our work with the DWP in this document. However, we would welcome further opportunities to discuss the impact the benefits system has on our sector at an appropriate time.

Turning to issues within the competence of the Senedd, given the significant increase in applications of Universal Credit and other benefits, including individuals who hitherto would be unfamiliar with the benefits system, we would welcome additional funding being afforded for Discretionary Housing Payments (DHP.) Therefore, we are calling for both the UK and Welsh Governments to work together to promote access to DHP, especially those who will not have been through the welfare system before. These groups might have difficulty accessing benefits as they might not be familiar with the welfare system or might be too proud to access support.

As the PRS continues to house a significant number of vulnerable people, it is inevitable that more people will find themselves in such a position as a result of Covid-19. We recognise that DHP is a useful scheme and could be adopted to support the most vulnerable tenants who are not claiming benefits, and who are struggling to pay rent in these difficult times.

Wider support

An unfortunate additional side effect of poverty is poor mental and physical health. The Social Housing Sector can support vulnerable tenants who have a variety of vulnerabilities including poor mental health, support in employment and money matters and access to food and essentials. While on the one hand, we have received many accounts of landlords supporting vulnerable tenants, they do not have the training and resources to support these tenants, in the same way as social housing providers. We would welcome targeted support for vulnerable people living in the PRS as a wider anti-poverty programme to ensure there is a parity in provision with the social sector.

We also welcomed the Welsh Government guidance for both landlords and tenants on what support is available to them during the pandemic and would welcome a continuation of this support after the pandemic. This could include supporting landlords on sign-posting financial support to vulnerable tenants to highlighting foodbanks,

Human rights and other areas within the portfolio of the committee

We recognise that in order to tackle the spread of Covid-19, then regrettably certain human rights and liberties may have to be restricted on a temporary basis. It appears that compliance with social distancing and other measures to restrict the spread has generally been high across Wales. Accordingly, we hope that the committee will consider

the basis of an exit strategy for normal social life to return in Wales as quickly but also as safely as possible.

We believe as part of this strategy, emergency legislation to restrict landlords from being able to start possession proceedings to evict tenants for at least a 3-month period during the crisis should not be extended further.

As restrictions begin to lessen, we would welcome consideration on how court procedures could return in Wales. Due to the closure of courts, we envisage that there will be a considerable backlog in cases, which could frustrate both landlords and tenants who are using the court and tribunal services for housing related cases. By using communication technology and by continuing to adhere to social distancing, we believe the court and tribunal system should return as soon as possible for those cases started before the stay, and for section 8 and other housing disputes to be heard.

Finally, we would recommend the opening of the sales and letting market as it is in England. This we believe could be achieved safely by viewing empty properties and viewing those with people living in them virtually. It would be highly beneficial to reopen the sales and letting sector as many people have had life changing circumstances and can no longer afford the rent or cost of their homes that they once could. Subsequently, they are 'trapped' in a property they can not afford. The sales and letting market also offer significant stimulus to a number of businesses within the Welsh economy.

What is the NRLA?

With over 80,000 members across Wales and England, we're the association created by the completed merger of the National Landlords Association and the Residential Landlords Association.

What does it aim to do?

We aim to unite landlords up and down the country behind one consistent voice in government and deliver previously impossible levels of service for our members. Through innovation and development, we will offer unparalleled benefits and experiences and work tirelessly to update the perception of landlords.

Our services

All NRLA members have access to a plethora of relevant services and specifically selected products, including unlimited use of our landlord advice team, deposit protection options, insurance, tenant referencing and credit checking and specialist mortgages to name a few. Our new industry publication will be available quarterly in both hard and digital formats, keeping you up to date with the latest news, proposals and trends within the sector. The NRLA online forum will provide an opportunity to put your questions, comments and experiences to fellow members and build a network of like-minded landlords.

Policy Officer

Swyddog Polisi

National Residential Landlords Association

Cymdeithas Genedlaethol Landlordiaid Preswyl

Appendix A

1. Wales data

There are 209 current active landlords in the survey whose portfolio is focused mainly in Wales – this is what is meant by “Welsh landlords” from this point forward.

Of these 38 (18.2%) are landlords of a single property, the remainder own more than one property.

2. Rental income streams

Table 1: Which of the following statements most closely reflects your experience since the lockdown began?

	No of responses	Percentage of respondents
01 My tenants have been paying all their rent as usual	70	33.65%
02 There are issues with late rent with at least one tenant, but these ARE NOT related to coronavirus	24	11.54%
03 Rental income has been affected as a result of the coronavirus	79	37.98%
04 I have experienced an increase in void periods since lockdown	5	2.40%
05 A combination of options 03 & 04 above apply	26	12.50%
06 Not clear which of the above apply to me	4	1.92%
Total	208	100.0%

Throughout the presentation of the Welsh data there will be minor differences between the Welsh response and the sample as a whole. So for example here the percentage of landlords whose rental income has been affected by coronavirus is approx. 38% compared to 34% across the whole sample.

It is UNLIKLEY you could say this is statistically important or significant: Especially as when added together 03,04 and 05 in the table above is very similar to the whole sample.

3. Loss of rent

Table 2: What has been your lost income?

	No of responses	Percentage of respondents
01 Equivalent to less than one months rent	12	11.01%
02 Approximately one months rent lost	23	21.10%
03 Two months rent or more lost	47	43.12%
04 Still unclear but losses probable	18	16.51%
07 Other	9	8.26%
Total	109	100.0%

Note the cell counts here are very low.

Those under “Other” are mainly extended voids – properties which have remained empty during lockdown – or where tenant has “done a runner”

4. Legal redress

12.5% of Welsh landlords had outstanding claims suspended (Section 8, Section 21 or both) on March 26th when proceedings were suspended. (This is just 26 landlords in total)

Just SEVEN landlords in Wales (3.4%) have served notice since 26th March – four landlords have served notice for rent arrears three to reclaim property.

5. Tenant requests

Because of software limitations and the complex survey collection process - this question is difficult to extrapolate an equivalent Welsh context.

46% of landlords received at least one tenant request and 90% of all landlords granted at least one tenant request. As with the sample as a whole, landlords, when approached, have been supportive.

The numbers in each cell are also very small – there is no reason for the Welsh response to be significantly different from those for the sample as a whole.

6. Mortgage holiday

There are just eight landlords with Wales-based portfolios (this is the correct way to describe the sample) who have applied for mortgage holidays – a further twelve are considering doing so. Again, the proportions are roughly similar given the low numbers.

7. Rent insurance

10% of “Welsh landlords” have taken out rent insurance policies (which is a smaller proportion than the sample as a whole, but again only 20 respondents).

Not one Welsh landlord has yet attempted to make a claim on that insurance.

8. Accessing property

As with the question of tenant requests, this is difficult to extract single region-based responses.

As with the national sample, around 30% have experienced no difficulties gaining access (or getting a contractor on site).

Gaining access for gas safety certification was the main difficulty landlords cited – there were 24 landlords (11.5%) who cited this as an example.

9. Landlords’ labour market position

Table 3: Impact of lockdown on your non-rental income

	No of responses	Percentage of respondents
01 I am tradesman/woman and my regular work has as good as disappeared because of coronavirus	12	6.25%
02 My non-landlord businesses have had to close as a result of lockdown	20	10.42%
03 I am in employment as well as being a landlord and I have been furloughed	8	4.17%
04 I was in employment but was laid off/made redundant as a result of lockdown	1	0.52%
05 I am in employment/self employment and my work has carried on much as before	47	24.48%
06 None of the above apply to me	104	54.17%
Total	192	100.0%

These figures are broadly similar to those for the sample as a whole – so around one fifth of landlords have faced some form of economic hardship as a result of the virus. (This represents about half of those landlords who are in employment).

10. In it together

Over one-third of all landlords (34%) had looked in on vulnerable or self isolating tenants.

Almost one-in-five landlords said they had offered a rent free period as a way of supporting tenants. This is somewhat less than the sample as a whole – but I wouldn't make too much of this (why would you): I would need to do much more work to be certain the comparison was truly like-for-like.

Appendix B

Case study [REDACTED]

[REDACTED] a landlord operating in the [REDACTED] area, offered his tenants the opportunity to a three-month rent holiday right from the very start of the lockdown restrictions. [REDACTED] owns three HMO properties each with four tenants.

So far two tenants have taken up the offer, while most of his tenants are working from home. Tenants have a mixture of occupations with only two that are students. In addition, [REDACTED] has one commercial property that is rented by an NHS paramedic where he has given a two-month rent holiday.

Case study - [REDACTED]

[REDACTED] is a letting agent for around one hundred and twenty-five modern self-contained properties across [REDACTED]. He has only had four tenants so far who have contacted him with payment concerns.

At the one end of this spectrum, [REDACTED] has met well to do tenants, who on showing their bank statements when they moved in previously – has had a “substantial sum” in the bank. Nevertheless, the Covid-19 pandemic has been life changing for many and the tenant pleaded hardship and wanted a 55% waiver of rent for 7 months. In addition, [REDACTED] has met other hardship cases where the tenant has required the services of foodbanks.

The first tenant was offered a reduction in rent until lockdown is lifted on the understanding that at that time the rent arrears will be addressed by a mutually agreeable payment plan, which he accepted.

The latter tenant, [REDACTED] offered a 50% rent reduction holiday and said he would address a payment plan once she was in a better position. In the meantime, as a letting agent, [REDACTED] arranged as an act of goodwill a food/gift parcel to include basic foodstuffs, toiletries and Easter Eggs for the family.

The tenant was extremely grateful. [REDACTED] daughter dropped the gifts off, and when she explained what she was delivering, the tenant’s young daughter rushed out and hugged [REDACTED] who was doing her best to explain about social distancing!

Case study - [REDACTED]

[REDACTED] are a married couple who are also landlords in the [REDACTED] area. The couple have reported excellent interaction with their tenants right from the start of the pandemic with regular text messages to each tenant to ensure that they are well and are coping with the lockdown restrictions.

Using their own words, the couple have outlined some positive examples of interaction with their tenants during the Covid-19 pandemic.

'Firstly, we contacted the tenants that we had recently increased their monthly rent and told them we were cancelling the increase for the foreseeable future. They were all so grateful but one said he would pay the increase as he was still working and could afford it. When I asked him to reduce his monthly payment he text back "No thanks [REDACTED].. thanks for asking". He's been a tenant for 6 years. He actually bought tears to my eyes, in a good way of course!'

'Another tenant who wasn't too happy with the rent increase but accepted it has decided to decorate through the property himself as we had offered to do it as a sweetener for his increase. He still is paying his usual top up even though we get more LHA for him & he doesn't have to.'

'A few tenants have contacted us with regard to their job situations and we have accepted partial payments and rent holidays, with the understanding that they will catch up once "normality" improves. They all understand that they will have to clear the arrears at some point. We ourselves aren't taking any mortgage holidays and no tenant has asked us if we are.'

'One young couple particularly have been struggling to pay catch-up with their rent since they were involved in a car accident last year and he lost time in work. They were just about caught up when Coronavirus happened, and he has been furloughed. Even so, they just paid April's rent in full. Their words to us "You've been both fab landlords. I will get back to you about DHP and about how much I can pay on the 10th once I know myself. Take care of yourselves both and stay safe x"'

'Another tenant who has totally lost her income has managed to make £100/£150 payments every few weeks. In her words "Thank you for being so understanding".'

Agenda Item 4

Equality, Local Government and Communities Committee

14 July 2020 – papers to note cover sheet

Paper no.	Issue	From	Action point
ELGC(5)-19-20 Paper 5	Inquiry into COVID-19 and its impact on matters relating to the Equality, Local Government and Communities Committee's remit	The Deputy Minister and Chief Whip	To note



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref MA/JH/1873/20

John Griffiths AS/MS
Chair
Equality, Local Government and Communities Committee
Welsh Parliament

30 June 2020

Dear John,

Thank you for your letter dated 29 May requesting further information on the impacts of the Covid-19 pandemic on areas of my portfolio, following my attendance at Equality, Local Government and Communities Committee on 15 May. I have set out the responses to each of your questions under the following headings for ease of reference.

Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV)

As agreed during the course of my evidence session with the Committee, I have attached my response to the correspondence received from Women's Aid in relation to funding for VAWDASV (**Annex A**).

The revenue budget for 2017-18 was £4.5 million while the capital budget was £969k. At that time it was intended that the VAWDASV revenue budget should form part of the flexible funding pilot which would have seen 11 grants brought together into a single grant. The Welsh Government accepted representations from the sector and agreed that VAWDASV funding should continue to be ring-fenced and to increase the budget by £0.5 million in 2018-19.

The revenue budget was further increased two years later, in 2020-21 to £5.25 million. At the same time Cabinet agreed a one-year additional capital grant of £1.2 million to fund disbursed community-based accommodation for those fleeing domestic abuse. This brought the VAWDASV capital grant to £2.169 million in 2020-21. This was confirmed in the final budget agreement in March 2020.

All of the £1.2 million additional capital grant has been allocated through the VAWDASV regional partnerships, although we await final outcomes from Cardiff and the Vale, which opted to procure, rather than grant-fund projects in that region. This, and further detail is laid out in my letter of 28th April in response to Sara Kirkpatrick, the new Chief Executive of Welsh Women's Aid's, letter (**Annex A**).

We recognised the pressures facing the sector as a result of the Coronavirus pandemic and for this reason we discussed with Welsh Women's Aid how the organisation could work with us to provide strategic leadership to the sector. I have made £100k available to the organisation and asked for their proposals which, I understand, they have sent in draft this week.

More significantly, we have taken on board international evidence from previous crises, such as 2009 economic crash, and natural disasters such as the Christchurch earthquake, which shows these tend to lead to an increase in domestic abuse and sexual violence. The restrictions on movements imposed to protect public health is highly likely to exacerbate the impact of the pandemic on the incidence of VAWDASV. For this reason I made a successful application to Star Chamber for a further £1.575 million of revenue funding. This will help specialist service providers develop their resilience to weather the storm of Covid-19 and to prepare for the expected increase in demand for their services.

This year, therefore, the VAWDASV sector has seen an increase in ring-fenced revenue funding from £5 million in 2019-20 to £6.825 million in 2020-21 – a rise of 31.5%. Furthermore, there has been a rise in capital funding from £969k to £2.169 million – a rise of 124%.

Aside from ring-fenced funding, the VAWDASV sector is able to apply to the Voluntary Sector Emergency Fund (VESF) and to the Third Sector Resilience Fund (TSRF). To date the VAWDASV sector has been granted £343,536 from the VESF, with a further joint application from 10 Women's Aid organisations for £171,066 currently being assessed. There have been no applications from the sector to the TSRF, which we have been promoting with the sector.

Much of this funding has been made in response to the exceptional circumstances posed by the Covid-19 pandemic although the increased capital grant was made to relieve the pressures on refuges. While being one-off funding for this year, it will provide ongoing benefits. I believe the training, capacity building and improved resilience that will be facilitated by the additional £1.575 million, together with learning from working during lockdown will also serve to strengthen the sector in coming years.

Sustainable Funding Group for VAWDASV

We are committed to working with our long-standing partners to develop a model for sustainable funding for the provision of specialist services to underpin the delivery of the National VAWDASV Strategy.

My officials presented two proposals to the group for a sustainable funding model last year, one of which was based on the model adopted by the WCVA; the models were not accepted by the group. Eleri Butler (then CEO of Welsh Women's Aid), Natalie Southgate (Cardiff and the Vale Regional Partnership) and Karen Jones (Western Bay Regional Partnership) have also submitted a paper outlining their proposals for sustainable funding.

Since that time, the Sustainable Funding Group has met, with the last meeting held on 12 May. During the meeting members determined that in order to produce and agree a comprehensive sustainable funding model for Wales, we would need to conduct a full funding mapping exercise of VAWDASV provision across Wales. Members of the group agreed to co-ordinate the mapping exercise and officials will collate the responses and present them to the next meeting due to be held in mid-July. This will provide the basis to review the current provision and funding sources and identify any remaining gaps. A new completion deadline will be identified, agreed and set at the next meeting.

Black, Asian and Ethnic Minority (BAME) Communities

I am pleased to update you that the BAME Advisory Group has developed and implemented a Risk Assessment toolkit and also published their Socio-economic Report on 22 June 2020. The First Minister made a statement the same day, welcoming the report, with a formal response currently being prepared. The recommendations from the Socio-economic Report will form the basis of the Race Equality Action Plan for Wales, which is currently being developed, and which will be followed by extensive engagement with communities across Wales.

Elder Abuse

During the Covid-19 crisis, it has been particularly important to safeguard adults with care and support needs. They may be more vulnerable to abuse and neglect as others may seek to exploit disadvantages due to age, mental or physical impairment or illness. We are mindful that many people may not be reached via social or digital media routes. We are therefore seeking alternative means in order to reach this cohort.

The Welsh Government is working with local authorities and other partners to ensure that critical work to safeguard adults at risk remains a priority for services during the outbreak. We know that large numbers of older people for example do not have access to digital technology so I would be keen to ensure that local authorities and their partners continue to offer alternative methods of communications in order to reach the most vulnerable within their communities and to enable them to self-identify.

Officials are continuing to develop appropriate means of communications in order to reach the widest possible audience to highlight and reinforce the message that safeguarding is everyone's responsibility. These approaches intend to support and reinforce the messages already produced by Regional Safeguarding Boards. Officials are working to provide guidance for those who are still operating in communities and may not be trained to recognise the signs of abuse or neglect. The guidance will cover signs to spot and what to do if there is a concern.

Data

Since 6 May, Public Health Wales (PHW) has included ethnicity and key worker status as a field in their Covid-19 rapid mortality surveillance enhanced reporting system.

Around 30% of the deaths notified via the PHW surveillance system did not have ethnicity recorded, and up to 18 June fewer than 10 deaths had been recorded for people from a BAME background. We know this is an undercount. Nevertheless, this is an important step forward in ensuring our surveillance data has this characteristic data.

Additionally, following requests by the Welsh Government, on 19 June the Office for National Statistics (ONS) published figures on the overall number of registered deaths in Wales where Covid-19 was involved from the start of the pandemic to mid-May. The ONS reported there were 44 deaths involving Covid-19 among BAME groups between 2 March and 15 May 2020.

We have also requested that ONS urgently consider the feasibility of extending the data they publish on deaths by occupation to include key data for Wales within their next article (currently scheduled for 26 June 26).

Voluntary Sector

The following table provides information on volunteering in Wales at 8 June 2020.

	No.
Total no. of volunteers registered	31,428
Increase since 1 March	18,071
No. in notified volunteer roles	7,188

The breakdown of total volunteers across Wales by Local Authority is as follows:

	AREA
5139	Cardiff
2512	Swansea
2101	Powys
1817	Newport
1652	Rhondda Cynon Taff
1591	Bridgend
1577	Caerphilly
1377	Flintshire
1374	Carmarthenshire
1275	Denbighshire
1260	Glamorgan
1293	Outside Area
1057	Conwy
1049	Pembrokeshire
902	Monmouthshire
884	Wrexham
868	Gwynedd
843	Torfaen
804	Neath Port Talbot
625	Blaenau Gwent
521	Ceredigion
456	Merthyr Tydfil
451	Anglesey/Ynys Môn

These figures do not take into account the large ground swell of informal community volunteers.

In terms of Emergency Third Sector Funds, charities are being prioritised on need in addition to the type of service being provided. The WCVA have published a list of all organisations supported by both the [Voluntary Services Emergency Fund](#) and [Third Sector Resilience Fund](#). The information is updated on a regular basis and is accessible via the embedded links.

Advice Services

As outlined in my recent response to your Committee Report '*Benefits in Wales: Options for better delivery*', officials are currently working together with UK Government officials, particularly with those from DWP, to ensure all measures being taken by the UK Government to mitigate the impact of Covid-19 are integrated with all current and new support being provided by the Welsh Government.

We will be building on action already undertaken in response to the current crisis when progressing our cross-Government Review of existing programmes and services. This will include further developing a set of principles and values on which a 'Welsh benefits system' will be based, taking account of feedback received during engagement for the Review, and building on the core principles the Welsh Government has already outlined of compassion, fairness, dignity and understanding.

Human Rights

The Contact Tracing App is entirely developed and delivered by NHSX, which is part of the Department for Health and Social Care (DHSC) in the UK Government. It will let people know if they have been near someone who has reported coronavirus symptoms and provide up-to-date guidance. It will also allow them to apply for a test if they start showing symptoms and it will give them the option of providing information to the app directly about their contacts if they test positive.

Human Rights analysis are undertaken as part of every impact assessment, and any questions relating to this should be directed to NHSX and DHSC, who are responsible for the App.

Partially Sighted People Accessing Priority Shopping

Where people can, we advise visually impaired people to seek the help of family, friends and support groups. Some supermarkets have put measures in place to help carers, volunteers and those shopping for others, and all supermarkets have introduced electronic vouchers or gift cards, allowing family, friends and volunteers to shop for others. This is set out at <https://gov.wales/getting-food-and-essential-supplies-during-coronavirus-pandemic>.

Where people do not have support locally, their local authority or local voluntary council can provide practical support.

Autistic Pupils Accessing School Hubs

We appreciate that the uncertainty arising from the unprecedented circumstances we are facing is particularly challenging for children and young people with additional learning needs (ALN) such as autism, along with their families and those who support and care for them. We are committed to doing everything possible to support these learners, parents and carers during this difficult time.

Schools closed for the statutory provision of education on 20 March. Since then, provision in schools and hubs has been available to vulnerable children and children of critical workers. Our definition of vulnerable children includes children with a statement of special educational needs (SEN). Schools have been working closely with colleagues in children's services to identify those who require access to provision. Each learner is considered on an individual basis to ensure that the hub can safely offer suitable provision and meet their specific needs.

We are asking local authorities to consider the needs of all children and young people with a statement of SEN, and to conduct a risk assessment to determine whether they will be able to have their needs met at home with support provided remotely. We have also advised that the assessment should involve parents or carers and the views of the child or young person, and be conducted through a multi-agency approach where possible. We are aware that securing a place in a hub has been difficult for a small number of learners with SEN. We are currently working with local authorities to develop guidance on risk assessments which will issue shortly. These risk assessments should be reviewed within the context of the increasing operation of education settings and in response to any change of circumstance for children, young people and their families.

In addition to the support available via schools and settings, there is a wide range of information available online to help support children with autism during the pandemic. Links to this information are available on the [ASDInfoWales](#) website, including a link to a useful [information pack](#) produced by child health professionals.

I hope this response provides the clarification required by the Committee. Should you require any further information, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jane', with a horizontal line above it.

Jane Hutt AS/MS

Y Dirprwy Weinidog a'r Prif Chwip
Deputy Minister and Chief Whip

Agenda Item 7

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

Document is Restricted