

Papur 3

Paper 3

Bevan Foundation response to the Equality, Local Government and Communities Committee's inquiry into COVID-19 and its impact on matters relating to its remit

Introduction

The Bevan Foundation is an independent, charitable think-tank that develops solutions to poverty and inequality. We are grateful for the opportunity to respond to the Equality, Local Government and Communities Committee's call for evidence to support its scrutiny of Covid 19 and its impact on matters relating to its remit. Our extensive work on poverty and inequality provides us with some insights into the difficulties faced by children living in low income households at this time and issues facing migrant communities and cohesion issues more generally. These impacts are likely to be significant and varied. Given our experience and expertise, our response will focus on the impact of Covid 19 on 3 of the broad policy areas that falls within the remit of the committee. Our is divided into main sections and will explore each of the following areas:

- Migration and Community Cohesion
- Tackling Poverty
- Housing.

Migration and Community Cohesion

Migrants, community cohesion and Covid 19

The Bevan Foundation has just completed a project exploring the experiences of migrants living in Wales and how they can be better integrated into our communities. Although the report, *Shared ground: integrating migrants in Wales*,¹ was completed shortly before the coronavirus outbreak, a number of the issues we identified are likely to be heightened as a result of Covid 19.

During our work we heard migrants who have experienced or witnessed racist abuse. We found that in recent times, driven by Brexit, many EU citizens had faced some form of abuse or discrimination. Just before we went into lock-down we became aware of anecdotal reports of abuse towards Chinese members of the community. During lock-down this has decreased as there are fewer people 'out and about'. However, we are aware of online hate speech and social media comments that have been made since the pandemic, including some abuse that has been targeted at the Muslim community. While this is harmful to community cohesion now, there are also concerns that as we come out of lock-down people may again become targets of racist abuse as people look to apportion blame to particular communities.

We found that many migrants live very isolated lives. Some only engage with a limited number of people and that will often be a family unit or other people with their ethnic group. As we have seen during this crisis there has been much local activism, however many migrants will have not have existing social connections within their communities and will face communication challenges if they cannot converse in the majority language, and do not have the regular support networks that transcend their local community.

Many migrants rely on support groups. This is particularly the case for asylum seekers and refugees who often rely on these groups for friendship and also practical forms of support such as food, counselling and health and education advice. We know that this support is a lifeline, but many support groups have had to close their doors and are not able to provide that direct service.

Communicating messages around Coronavirus, social distancing, health advice and guidance and financial support is crucial for all communities across Wales, however migrant groups may face even

¹ Bevan Foundation, *Shared ground: integrating migrants in Wales* (April 22, 2020)

greater barriers. Communication with migrants can be difficult during normal times, particularly those who do not speak or have any level of English and are isolated. Often, they will rely on support groups or other community members for help or other more informal communication methods – to attend doctors' appointments and visiting, attend other appointments and translate written material. Some will have the choice of formal interpretation, but this can be poor, and translators often do not have the right skill set to provide the right level of service.

The ability to communicate has long-term implications for integration. Many migrants attend ESOL classes or community conversation classes to improve their language skills. As a result of Covid-19 physical meetings are no longer happening, and it is unlikely that they will return at the same time as schools and it could be several months before they return to normal. Even prior to the lock down we were aware of high numbers on waiting lists, and this will increase pressure on the system once they return. This gap in provision could also severely hamper and set-back learners progress and we are aware of different learning abilities which may make it difficult for some to learn successfully at home. Also, people need to feel motivated, and this motivation could drop off if they are not required to speak it as they are not conversing with people in their daily lives.

Many migrant workers are working in key positions in Wales, for instance many are currently working in the care sector, providing vital support to elderly and vulnerable people in their own homes or other settings. Many will also be employed by agencies, be employed in casual positions or on zero-hour contracts, and many already face financial hardship as a result. Whilst many workers will have had their jobs protected through the UK Government's furlough scheme, many will have seen their wages reduced as a result and migrant workers could have been disproportionately affected. Thousands of other workers have lost their jobs despite the scheme, whilst some workers have seen their hours reduced, and others, such as the newly self-employed have been required to turn to the social security system for support yet we found in our work that many migrants face issues and discrimination from this system, and people told of occasions where they have been turned away for support because of the immigration status.

Asylum seekers in particular will be financially affected by Covid-19. They currently receive just over £35 per week. Already struggling before Covid-19, they often rely on attendance at support groups etc. for additional items of food, clothing and personal items. With small amounts of money many will not be able to do 'big' shops or shop online in the same way as others, and as such will find it more difficult to comply with social distancing guidance.

Many migrant families will be restricted to their homes, which could be unsuitable and overcrowded with very little realistic opportunity to self-isolate, particularly if anyone in the household developed symptoms. Worryingly, many children from migrant households will be home-schooled for many months, however we found that many families do not speak English at home or cannot speak English therefore it will be extremely difficult for them to carry out tasks sent home by the school and language development could be affected by this gap.

Lastly the progress of the European Union Settled Status Scheme (EUSS) has been impacted by Covid-19. Much of the activity of the Citizens Rights Programme was face to face-based support and guidance. We were already concerned that Wales appeared to be behind the rest of the UK in terms of its completed applications, and given the deadline of June 2021 feared that many EU citizens would become irregular migrants as a result – losing some of their rights in the process. This is a major set back as people who need face to face contact to complete the application will now have to wait – particularly those who don't have the digital skills to do so. Further, much of the awareness raising was delivered via drop-ins.

The Actions taken by the Welsh Government, local authorities and other organisations

The Welsh Government, local authorities and other organisations have taken a number of welcome steps to mitigate the impact of Covid 19 on migrants.

In terms of tackling hate crime, the Welsh Government funds the hate crime and support centre which provides support for victims of hate crime. In 2019 it allocated £840,000 worth of funding to the Hate Crime Minority Communities Grant fund over two years which was used to increase capacity at the centre but also provided support for community organisations working with ethnic minority and faith communities to tackle hate crime. A further £330,00 of funding was given to a range of organisations across Wales to increase understanding of hate crime and how to report it, challenge negative attitudes in schools and colleges, and explore restorative justice approaches with perpetrators and a national campaign to reduce the incidence of hate crimes and incidents in Wales. Despite these efforts, in our report *Shared ground: integrating migrants in Wales*² we found that migrants often do not report hate crime. Since the pandemic, organisations have attempted to spread awareness of hate crime and reporting during the pandemic, and activities like the ‘Don’t hate, educate’ programme is now being delivered online. However, more action needs to be taken now to combat online hate speech –which will do lasting harm to our communities.

However, a reactive policy alone cannot deal with some of the divisions which exists within our communities, and we are arguing for a Wales-wide integration framework which aims to bring communities together, to tackle some of the underlying issues and attitudes which exist within our communities. While we are aware that there will be much to rebuild as we come out of this crisis, this will be more difficult if communities do not work together.

We are also calling on the Welsh Government to support a ‘cohesion network’ to ensure that issues affecting migrant groups are considered across the public and private sectors, not just by third sector groups which are supporting them. It should involve housing, health and education providers and importantly employers. Given the need to rebuild our communities after Coronavirus, developing a partnership approach is even more important than when we first recommended this, prior to the pandemic.

In terms of ESOL provision, the Welsh Government needs to consider the impact the pandemic has had on people’s individual learning journeys, but also on those who were unable to access support prior to lock-down. It therefore needs to reevaluate its current approach, taking into account some of the lessons learned from lock-down. For instance to what extent has online learning made ESOL more accessible for people who have work or childcare commitments?

Children who live in non-English/Welsh speaking families should receive additional language support before or when they return to school to ensure they have not been negatively effected as a result of lock-down.

Another area where we believe steps could be taken by the Welsh Government to help migrant families more generally is through the promotion of support schemes that are available to low income families in Wales. Schemes such as the Council Tax Reduction Scheme and the Discretionary Assistance Fund already provide vital support to thousands of families across Wales, but may not be as widely known amongst migrant communities. Some migrants may feel they are not eligible particularly if they have faced discrimination when trying to access financial assistance in the past. As we come out of lock-down these families may continue to struggle, and it is vital that our frontline staff are not discriminating on the basis of migrant status. We are aware that the Welsh Government will be delivering training on migrants’ rights, and this needs to be rolled-out urgently so migrants do not face unnecessary financial hardship.

² Bevan Foundation, *Shared ground: integrating migrants in Wales* (April 22, 2020)

We also believe that there is a role for the Welsh Government to play in putting pressure on the UK Government to make changes to the UK-wide asylum system. Firstly, we agree with the growing number of charities, including the Welsh Refugee Council, that the UK Government should increase the amount of financial assistance asylum seekers receive, which should be brought in line with Universal Credit.

We also believe that there is now a stronger case for lifting the ban on asylum seekers being able to work. We think this would be extremely worthwhile and would follow a number of other countries who have done this in response to the pandemic. In our report, we made the case for providing more meaningful voluntary activities for asylum seekers and refugees who cannot work and in some European Countries they have sought to provide asylum seekers with voluntary roles to support the response to Covid-19. In the short-term the Welsh Government along with local authorities and others could engage asylum seekers in this way.

In terms of EU citizens, the Welsh Government should do all it can to protect their rights by making the case to the UK Government to, at the very least, extend the timeline of the application to compensate for the time lost due to Covid-19.

Tackling poverty

The impact of Covid 19

The most recent data on poverty in Wales was published on the 26th of March, as the nation was beginning to come to terms with the new lockdown measures introduced to control the spread of Covid 19. The newly released data was for the 2016/17 to 2018/19 period, providing a snapshot of poverty in Wales at the eve of the Covid 19 outbreak.

The data showed that for the three year period to 2019, 23% of people in Wales lived in poverty,³ approximately 700,000 people.⁴ Even before the Covid 19 outbreak people living in poverty were at a greater risk of being in poor health, whilst children growing up in poverty were less likely to achieve the top grades in school than their peers from higher income households. The impact of these inequalities has been starkly highlighted by the virus itself with the mortality rate for Covid 19 being nearly twice as high in Wales's most deprived areas compared to its least deprived.⁵

The virus has not only highlighted the impact of existing inequality on society. Covid 19, alongside the lockdown measures put in place to stop its spread is likely to have exacerbated the issues that so many families trapped in poverty were already facing. Not only do the lockdown measures mean that thousands of people who are already trapped in poverty face deepening hardship, many more risk being pulled into poverty alongside them.

16% of Wales' employees work in business that have been ordered to close as a result of the lockdown.⁶ The economic consequences of Covid 19 mean that many thousands of other workers, working in sectors that have not been directly impacted by social distancing measures have also been

³ Stats Wales, 'Percentage of all individuals, children, working-age adults and pensioners living in relative income poverty for the UK, UK countries and regions of England between 1994-95 to 1996-97 and 2016-17 to 2018-19 (3 year averages of financial years)' available at - <https://statswales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/Poverty/householdbelowaverageincome-by-year>

⁴ Stats Wales, 'People in relative income poverty by tenure type' available at - <https://statswales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/Poverty/peopleinrelativeincomepoverty-by-tenuretype>

⁵ ONS 'Deaths involving COVID-19 by local area and socioeconomic deprivation: deaths occurring between 1 March and 17 April 2020' (1 May 2020) available at - <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/deathsinvolvingcovid19bylocalareasanddeprivation/deathsoccurringbetween1marchand17april>

⁶ Bevan Foundation, 'State of Wales Briefing: Risks and Impact of Coronavirus' (March 27, 2020)

affected. Whilst many workers will have had their jobs protected through the UK Government's furlough scheme, many will have seen their wages reduced as a result. Thousands of other workers have lost their jobs despite the scheme. The most recent data shows that the number of people claiming Job Seekers Allowance and Universal Credit had doubled between April 2019 and April 2020, with nearly all the growth happening in the last month.⁷ Other workers have seen their hours reduced, whilst some, such as the newly self-employed have fallen through the cracks in the system and have been required to turn to the social security system for support.

Even some workers whose employers are still operating as normal have faced significant challenges. As many as 10% of Welsh employees don't earn enough to qualify for sick pay, with this being the case for a higher proportion of disabled people and women, leading to a significant cut in income for many faced with having to self-isolate.⁸ Recently published research by the Resolution Foundation highlighted that 68% of households across the UK had seen a reduction in their household income as a result of the outbreak.⁹

These pressures have been especially pronounced for families with children, with research from Turn2Us showing that families with children are more likely to have lost income as a result of Covid 19, with 71% of children living in families where at least one parent has had their employment affected.¹⁰ An additional risk factor for families with children is childcare. Often reliant on schools and grandparents for childcare previously, parents, who would have the option of continuing in work fulltime, are having to reduce hours or be furloughed, and some are even having to take unpaid leave or are losing their jobs.

At the same time that many people have seen their income reduce, their living costs have increased. Faced with spending an increased amount of time at home, households are facing increased utilities bills and the stockpiling of food especially affected those on low incomes, with the Trussell Trust seeing a record spike in the number of people using its food banks at the end of March.¹¹ Families with children have again been especially impacted. Restricted to their homes, without school, access to libraries and often limited access to parks, families are faced with increased bills, as they try to home educate children, as well as keep them entertained. Over 60,000 children in Wales lost access to Free School Meals when schools were shut.¹² Given that some families in receipt of Free School Meals are faced with spending an additional £30 to £40 a week, on food during school holidays, this is a significant benefit families are missing out on.¹³ Furthermore, whilst childcare providers are shut, parents are still being asked to contribute towards their childcare costs or risk losing their child's place when the provider reopens. This may be a particularly pressing concern for parents who have seen their incomes reduced, owing to them having to take on more childcare commitments following the closure of their provider.

⁷ Office for National Statistics, 'H110 Regional labour market: Headline indicators for Wales' (19/05/2020) available at -

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/headline-labour-forces-survey-indicators-for-wales-h110>

⁸ *ibid*

⁹ The Resolution Foundation, 'The economic effects of coronavirus in the UK' (April 30, 2020) available at - <https://www.resolutionfoundation.org/publications/the-economic-effects-of-coronavirus-in-the-uk/>

¹⁰ Turn2us 'Coronavirus pandemic leaves children facing financial crisis' (22 April 2020) available at - <https://www.turn2us.org.uk/About-Us/Media-Centre/Press-releases-and-comments/Coronavirus-pandemic-leaves-children-facing-financ>

¹¹ Trussell Trust, 'Food banks report record spike in need as coalition of anti-poverty charities call for strong lifeline to be thrown to anyone who needs it' (1 May 2020) available at - <https://www.trusselltrust.org/2020/05/01/coalition-call/>

¹² Bevan Foundation, 'State of Wales: Free School Meals and Coronavirus' (29 April 2020)

¹³ Andrew Forsey, Hungry Holidays – Report of the APPG on Hunger (2017) UK Parliament All Party Group on Holiday Hunger

The increasing pressures felt by many households are likely to have an impact on their wellbeing. People from low-income backgrounds are particularly vulnerable to economic shocks, with the long-term impact on their health, education and economic outcomes well documented. Many households don't have adequate digital access for home learning and to stay connected, either relying on pay-as-you-go data or having only one, often small, device shared amongst family members. For children, this can have an impact on their education. Recent research by the Sutton Trust highlights the impact this is having on children's education during lockdown. For example, whilst 50% of teachers in private schools report they're receiving more than three quarters of work set for their pupils during this period back, only 27% report the same in the most advantaged state schools, with this dropping to just 8% in the least advantaged state schools.¹⁴

It is not just children affected, however. With public spaces such as libraries and community hubs shut, many people living in poverty have lost access to the support services and technology they rely upon. This does not only make it more difficult for individuals to manage their finances and their social security entitlements, but increases their risk of feeling isolated, with people living in poverty unable to afford the technology many have come to rely on to stay connected during lockdown.

Tackling poverty – the actions taken by the Welsh Government and Welsh local authorities

The Welsh Government and local authorities have taken a number of welcome steps to mitigate the impact of Covid 19 on people who are trapped in poverty.

The recent announcement by the Welsh Government that an additional £11 million will be made available to support the Discretionary Assistance Fund (DAF) and that restrictions on how often an individual is entitled to apply for support is hugely encouraging.¹⁵ DAF already provides vital support to thousands of families across Wales. It is vital that the Welsh Government seeks to promote DAF further amongst the wider public, given that some of the families who are currently struggling may have little experience of engaging with the welfare system or with support agencies.

Another welcomed step taken by the Welsh Government is the decision to make an additional £40 million available to help local authorities deliver support in lieu of Free School Meals, including over school holidays.¹⁶ We do have some concerns however, about the discrepancy in how individual local authorities are using these funds to support families.

Immediately following the announcement that schools across Wales would be shut, local authorities sought to put in place emergency measures to ensure that families in receipt of Free School Meals continued to receive some support. This primarily took the form of "grab and go" food bags, with parents encouraged to attend schools to collect lunch that would be provided for their children in lieu of Free School Meals. The shortcomings of this approach became immediately apparent with anecdotal evidence from a range of local authorities suggesting that only a small proportion of parents were attending schools to collect these meals, due to stigma, a lack of access to public transport following the lock down, and concerns about social distancing. Many local authorities sought to find alternative ways of providing families with support.

¹⁴ Sutton Trust, 'Covid 19 Impacts: School Shutdowns' (20 April 2020) <https://www.suttontrust.com/our-research/covid-19-and-social-mobility-impact-brief/>

¹⁵ Welsh Government, 'Discretionary Assistance Fund receives £11m boost in Wales' (1 May 2020) <https://gov.wales/discretionary-assistance-fund-receives-11m-boost-wales>

¹⁶ Welsh Government, 'Wales has become the first country in the UK to guarantee ongoing funding for children to continue to receive free school meals during the coronavirus pandemic' (22 April 2020) available at - <https://gov.wales/wales-has-become-first-country-uk-guarantee-ongoing-funding-children-continue-receive-free-school>

Local authorities have developed three primary models for providing support in lieu of Free School Meals in line with Welsh Government guidance:

- Direct cash transfers to families
- Food vouchers that parents can redeem at supermarkets
- The delivery of food parcels

Initially, it appeared that the Welsh Government's preference was for families to be provided with vouchers in lieu of Free School Meals, with the Welsh Government seeking to develop a national voucher scheme, in line with the one in place in England. Local authorities would then be able to opt into this system. The Welsh Government have now abandoned these proposals, a step welcomed by the Bevan Foundation. Early feedback from England suggests that the scheme has been difficult to administer. Not all supermarkets have signed up to the scheme meaning parents have to travel considerable distances to shop or visit more expensive stores than they would otherwise do, whilst stigma issues have not been fully removed.

To counter some of these short comings the Bevan Foundation has consistently argued that the Welsh Government and Welsh local authorities should provide cash to families in lieu of Free School Meals. We believe that providing cash to families is the most effective way of supporting social distancing, providing families with flexibility and choice, improving convenience for families by allowing them to shop local, reducing stigma and allowing families to prioritise their spending needs.¹⁷ Whilst it is important that the Welsh Government and local authorities continue to provide additional support to families that may fall through the cracks in any cash based system, for example, by supporting local foodbanks, we believe that all local authorities should be providing families with the option of receiving cash in lieu of Free School Meals.

17 local authorities either now do so or have announced plans to introduce such a system soon.¹⁸ Whilst we welcome the moves made by these local authorities, we are concerned that families trapped in poverty in Bridgend, Caerphilly, Merthyr Tydfil, Newport and the Vale of Glamorgan, may be missing out on support they vitally need, due to the fact that their local authorities do not provide them with the option of receiving a cash payment.¹⁹ We believe that the Welsh Government should give a clear steer to these five local authorities that they should provide cash, to ensure parity of support across Wales. In conjunction to this, we believe that it is important that the Welsh Government regularly ask for updates from local authorities about how many children have taken advantage of alternative Free School Meals support. This would allow the Welsh Government to share best practice across authorities and would enable it to identify whether any additional funding will be needed to maximise support.

Other measures taken by the Welsh Government which we welcome include the decision to temporarily remove attendance requirements for young people in receipt of EMA, and the announcement that £3 million will be made available to support children from digitally excluded families.²⁰ Whilst we welcome the announcement of extra support for digitally excluded children, we believe that it is important that the Welsh Government recognises that many children will still continue to struggle to get access to learning materials online and that there is likely to be significant learning loss amongst children from low income households when schools finally reconvene.

In addition to putting new schemes in place we believe that it is important that the Welsh Government and Welsh Local Authorities make a concerted effort to promote all the support services which it is

¹⁷ Bevan Foundation n(10)

¹⁸ ibid

¹⁹ ibid

²⁰ Welsh Government 'Extra £3 million to support digitally excluded learners' (30 April 2020), available at - <https://gov.wales/extra-3-million-pounds-support-digitally-excluded-learners-wales>

providing. In addition to the support schemes already discussed other schemes that Welsh Government should promote extensively include the Council Tax Reduction Scheme, Discretionary Housing Payments and Health Start Vouchers.

We also believe that there is a role for the Welsh Government to play in putting pressure on the UK Government to make changes to the UK wide social security system. As the number of households dependent on the safety net it affords has increased, it is more vital than ever that the social security system provides sufficient support. We welcome some of the steps that have already been taken by the UK Government on this but believe that significantly more can be done. Amongst the reforms that we believe that the Welsh Government should be pushing for include the end of the 5 week wait for Universal Credit, the scrapping of the benefit cap and an increase in the child element of Universal Credit and Child Tax Credits to increase by at least £20 per week.²¹ Such changes would provide a significant uplift in support to households who are struggling, putting more money in families' pockets.

One further area where we believe that the Welsh Government could take action to lessen the impact of Covid 19 on poverty relates to another of the committee's areas of interest, housing.

Housing – the impact of Covid 19 and the actions taken

Housing is the largest living cost faced by most households. Whilst many households have seen their incomes reduce as a result of Covid 19, they must still find enough money to pay for their rent or their mortgage at the end of every month. Indeed many social housing tenants in Wales actually saw their rents increase as restrictions were put in place to control the spread of Covid 19.²² The scale of the crisis has been such that some much welcomed action has already been taken by the UK and Welsh Governments as well as by banks who have provided mortgage holidays for many borrowers.

Action taken by the UK and Welsh Governments have provided vital short-term support for households across Wales. It is welcome that families are safe in the knowledge that landlords are not permitted to evict them whilst lockdown measures remain in place. Many households, however, are likely to be falling significantly behind on their rent, building arrears that might lead to their eviction once lockdown protections are lifted. Such uncertainty causes significant stress for families and may lead to some households prioritising spending their money on rent, rather than on other essential items such as food. These pressures are likely to be most pronounced for households living in poverty.

The Welsh Government has already taken some action to ease these pressures in the social housing sector. On April 3rd the Minister for Housing and Local Government, Julie James MS, published a letter to social housing tenants which sought to reassure tenants that there will be support available for rent arrears. The Minister states –

All social landlords have agreed not to take eviction action against any tenants experiencing financial hardship as a result of coronavirus. I have asked them to go further and ensure every tenant can get support when they need it and that no tenants are left with unmanageable debts when the coronavirus crisis is over.²³

Whilst this statement is to be welcomed it does leave many outstanding questions, the most pressing of which is what constitutes, an “unmanageable debt” and how would a tenant/ landlord prove that

²¹ Joseph Wilkes, 'Coronavirus crisis puts 8.5m children in UK a pay cheque away from going without food' (*Daily Mirror*, 23 April 2020) available at - <https://www.mirror.co.uk/news/uk-news/coronavirus-crisis-puts-85m-children-21908857>

²² Steffan Evans, 'Dealing with the fallout of coronavirus – the role of social housing rents' (*Bevan Foundation*, 15 April 2020) available at - [Dealing with the fall out of coronavirus – the role of social housing rents](#)

²³ Minister for Housing and Local Government, 'Letter to all social housing tenants' (3 April 2020) available at - <https://gov.wales/sites/default/files/inline-documents/2020-04/letter-to-all-social-housing-tenants-in-wales.pdf>

that debt was a result of coronavirus? This lack of clarity could see many tenants opt out of receiving support they desperately need. It is vital that the Welsh Government provides greater clarity as to what level of support social housing tenants are expected to receive once the immediate impact of the crisis begins to ease.

There is also a need for greater clarity on what the Welsh Government's medium to long term plans are with regards to the increased debt social landlords will be holding. Increased debt could have an impact on a social landlord's regulatory rating and lead to a landlord breaching borrowing covenants. Asking social landlords themselves to repay the debt would severely impact their ability to construct new social housing and put pressure on them to increase rents further in 2021/22. Will the Welsh Government therefore be prepared to pay down some or all the debt accrued by social landlords over the next few weeks and months? We believe that it is crucial that the cost of covering increased arrears does not fall on the broader tenant body, nor that it should have an impact on the Welsh Government's broader social housing building programme.

Indeed, the current crisis raises fundamental questions about the viability of continuing to ask tenants to cover the costs of constructing new social housing through their rents. As the crisis has demonstrated, at time of financial hardship, those already living on the margins of poverty are often squeezed the hardest. We believe that the time has come to move to a fairer, more sustainable and a more redistributive approach to funding the construction of new social housing in Wales. One way in which this could be achieved is for the Welsh Government to reprioritise its investment in housing, increasing spending on social housing grant, whilst cutting spending on other schemes such as the help to buy programme which has less clear benefits for improving housing affordability.²⁴

Whilst there is a need for more clarity from the Welsh Government about the support that is on offer to tenants in the social housing sector, this need is even more pressing within the private rental sector. Whilst some tenants may be able to draw on the DAF and Discretionary Housing Payments to help them with some of their housing cost, this support is unlikely to be sufficient to support all households struggling with their rent. Whilst we support the Welsh Government's calls to the DWP to relax the eligibility criteria for DHPs in line with the action its taken with regards to DAF, the Welsh Government should also commit to providing local authorities with additional funding to allow them to provide the maximum amount of DHP support over the coming months. Even having allowed for this however, there is a need for the Welsh Government to publish clear proposals on how it will avoid a homelessness crisis within the private rental sector once current restrictions on evictions are lifted.

²⁴ Steffan Evans, *'Time to shift the dial? Is social housing the solution to or cause of poverty'* (Welsh Housing Quarterly, April 2020, available at - <https://whq.org.uk/the-magazine/issue/118/time-to-shift-the-dial/>)