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Consultation on homelessness – Autumn 2022
Ymateb gan: Tai Pawb
Response from: Tai Pawb



promoting equality in housing
hybu cydraddoldeb ym maes tai

Tai Pawb

Response to:

Homelessness

Local Government and Housing Committee

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For further information about this paper please contact:

Name: David Rowlands

Position: Policy Manager

Email: [REDACTED]

Telephone: 029 2278 8956



Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. Our vision is a “Wales where everyone has the right to a good home.” We operate a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector. We are also part of a coalition called “[Back the Bill](#)”, which seeks to establish the legal right to adequate housing for **all citizens** in Wales.

For further information visit: www.taipawb.org

Charity registration no. 1110078

Company No. 5282554

1 Introduction

- 1.1. Tai Pawb welcomes the opportunity to respond to this consultation regarding the use of temporary accommodation in Wales. The use of [temporary accommodation](#) has grown from 2,226 households between January and March 2019 to 4,464 households between January and March 2022; an increase of just over 100%. But this growth has not occurred in isolation, rather symptomatic of a wider housing crisis in Wales. Unforeseen circumstances such as the Covid pandemic, Afghan and Ukraine refugee crises have contributed to this growth, but longer-term structural issues such as lack of supply of social homes, high private sector rents and use of inappropriate temporary accommodation are the root cause. As we enter a recession and a potential return to austerity, cases of homelessness will likely rise. Understanding Wales' use of temporary accommodation now, including its impact, cost and alternatives, are necessary to help plan in the short to medium term – and to importantly understand what we can do longer term in prevention.
- 1.2. In completing this consultation response, Tai Pawb has sought the views of a number of member organisations, including Cyfannol Women's Aid, and used insights from people currently living in temporary accommodation. We've sought insight from colleagues in Shelter Cymru and support its submission to the call for evidence. While we are not a service provider, we've focused this response on areas particularly relevant to our remit around inequality and human rights.
- 1.3. Our response considers temporary accommodation to include all forms of short-term accommodation collected by Stats Wales, including B&Bs, hotels, refuges, hostels, and short term private and social lets. Some of which are more appropriate than others for

temporary accommodation. For instance, while B&Bs are very rarely appropriate, stays in supported accommodation such as refuges and hostels can be beneficial for some, including those fleeing domestic abuse or sexual exploitation. Tai Pawb recognise that these forms of temporary accommodation are necessary, should continue and require investment, even in light of a focus on rapid rehousing.

- 1.4. This consultation focuses on temporary accommodation in Wales currently. Yet the scale of its use reflects a longer-term failure of the Welsh housing system. Not on behalf of providers, charities, or local authorities, but the lack of a long-term housing plan. **Tai Pawb strongly believe incorporating a universal right to adequate housing will resolve this.** Recent [Independent research](#) has identified incorporating a universal right to adequate housing will save £11.5 billion over a 30-year period in Wales, compared to costs of £6.5 billion. Savings of £2 billion could be achieved by local authorities, with a reduced reliance on temporary accommodation. Incorporating the right to adequate housing would mean more investment in housing, more focused and appropriate temporary accommodation so when homelessness occurs, it is 'rare, brief, and unrepeated'. While the right to adequate housing is not the focus of this response, we feel its necessary to recognise the impact it could have on reducing the use of temporary accommodation in the long term.

2 Temporary accommodation in Wales; understanding the figures

Increased use of less appropriate forms of temporary accommodation

- 2.1 Traditionally, temporary accommodation is a short-term service for people who need somewhere to live to prevent rough sleeping, which sometimes includes help to sustain tenancies, develop life skills or receive support. While its use has increased by over 100% in three years, this rate of growth is not equal across all accommodation types.

Whereas B&Bs have increased by over 474%, refuges and hostels have increased by 18%. This means the least suitable forms of temporary accommodation are where the biggest growth has been, which is where this consultation will largely focus.

Tai Pawb recommendation – continued and increased investment in temporary accommodation that provides (tailored, suitable) support for those that need it.

Better data to guide a better offer

- 2.2 Data available on Stats Wales identifies around a quarter of the households in temporary accommodation contain children. However, the demographics of those using temporary accommodation are unclear. For instance, it isn't known how many of those living in temporary accommodation have a protected characteristic as defined by the Equalities Act 2010. Having this data could help in three ways; firstly, to understand whether particular groups were more likely to be placed in temporary accommodation, or in certain forms of it. Secondly to understand whether people's needs are met through their temporary accommodation placement and help plan for the most appropriate type needed in the future. Figures aren't available for the number of people living in temporary accommodation who are disabled, a study by [Crisis](#) in 2017 found that of those experiencing or at risk of it homelessness, 39% had a disability, almost double the number of people estimated to be disabled in the wider population. Therefore, it is likely that a considerable number of people living in temporary accommodation have a disability. Finally, having this information could also help identify communities of people more at risk of using temporary accommodation, so could help guide preventative work.

Tai Pawb recommendation – Collect better data on those accessing temporary accommodation to ensure current and future needs are met; moreover, that any patterns can be better understood and potentially mitigated

3. The suitability and quality of temporary accommodation

Consideration of human rights

3.1 In 2021, the [Public Sector Ombudsman report](#) highlighted a number of issues within homelessness services including:

- No overt consideration of local authority's duties under the Equality Act – including people with protected characteristics around ethnicity, and disabled people who may need specific, supported, larger or adapted accommodation.
- No overt consideration by local authorities of human rights when placing people in temporary accommodation.

The impact of not having rights considered when allocating accommodation include:

- Location - people placed in temporary accommodation, which is near a perpetrator of domestic violence, near other negative influences or away from services or support networks.
- Type of accommodation - Lack of adapted or accessible accommodation, or placements for larger families.
- Clustering - Vulnerable people placed in accommodation together leading them at risk of developing substance misuse issues and then being evicted as a result of this.

3.2 Not considering people's rights can have consequences. Not just does it affect their wellbeing but their ability to rebuild their lives. Dealing with homelessness is hard enough, let alone in accommodation that isn't right for you. The Public Sector Ombudsman report recognised unsuitable accommodation as a key cause in the breakdown of some temporary accommodation. In a worst-case scenario, rather than

preventing homelessness, unsuitable accommodation can lead to it; impacting lives while also leading to additional costs to public services.

Examples of inappropriate placements

- 3.3 Cyfannol Women's Aid's experience of temporary accommodation around B&Bs is mixed. While some placements are acceptable, many are less appropriate. For example, a mother with two young children placed in accommodation above a pub, not only without cooking facilities but the landlord wouldn't allow them to leave their room after 7pm. As well as impacting the family's wellbeing, this impacted their finances due to having to eat the majority of meals out. (Cyfannol paid for a couple of days B&B costs while they were able to source alternative accommodation through the refuge network).
- 3.4 In another instance, vulnerable women were placed in a building with a man who had a known history of exploiting women. Clearly, this is not appropriate. As a result of this, Cyfannol now review all accommodation offers for vulnerable women and if necessary, take the decision to pay and place them elsewhere to ensure their safety. While necessary, this takes valuable resources from being used elsewhere.

Temporary accommodation and disability

- 3.5 Little research is available on disability and temporary accommodation in Wales, but a study in England highlights some of the challenges faced by disabled people living in temporary accommodation. These can include rooms that are not fully accessible for washing facilities (i.e. handrails). Fire doors being too heavy to move or windows not being easy to open. Respondents also reported difficulties when placed on floors without all required amenities when lifts were not working, leading to instances of people falling down the stairs as a result.
- 3.6 While the research above is based on experiences in England, they are from the same types of temporary accommodation used here in Wales. The growth in use of temporary accommodation, means it is much

harder for local authorities to ensure that placements are appropriate, which is why more robust processes are required.

Tai Pawb recommendation – A fuller and more detailed process considering local authorities’ duties in relation to human rights is required to prevent inappropriate accommodation and plan for better placements. (Additionally, a baseline and ongoing data set would help to better understand how many disabled people are accessing temporary accommodation).

4. Options to increase the supply of affordable and appropriate housing in the short to medium term to reduce the use of temporary accommodation

Refugees and people with no recourse to public funding

- 4.1 A proportion of the people currently being housed in temporary accommodation are refugees, while people with no recourse to public funding may also be placed in some forms of temporary accommodation. Tai Pawb in partnership with Oasis is currently undertaking an innovative project which will place refugees and people with no recourse to public funding in a rental property, to deliver a sustainable housing solution. If successful, this could provide an alternative to temporary accommodation. More information on this project can be found [here](#).

More funding for innovative solutions

- 4.2 There is a general feeling that a silver-lining to the recent pandemic was to encourage innovation, as local authorities and service providers came together to look at (and provide) alternative ideas in the midst of needing to support people urgently. An ‘innovation fund’ could award grants to front-line charities or service providers to work in partnership with local authorities and use their experience to identify opportunities to innovate and reduce use of temporary accommodation. Solutions could include accommodation designed specifically for women or social

investment to develop more appropriate forms of temporary accommodation.

Investment to purchase social homes

- 4.3 New homes can take a long time to plan, build and complete. An alternative option could be for the Welsh Government to work with providers to create more social housing through grants that allow the purchase of homes from private rentals by social landlords. Given the rise in interest rates and potential fall in house prices, this could be an opportune moment for such an investment.
5. **Progress implementing Ending Homelessness in Wales: A high level action plan 2021-2026, and in particular the move towards a rapid rehousing approach.**
- 6.1 ‘Ending Homelessness in Wales’ outlines steps in how Wales can make homelessness, ‘rare, brief and unrepeated’. Rapid rehousing is fundamental to this approach with the Action Plan stating, “the best way to make homelessness brief is by making sure people experiencing it reach settled housing as quickly as possible rather than staying in temporary accommodation”. Clearly, the current scale of temporary accommodation risks undermining this approach. Tai Pawb would like to make the following observations in relation to this Action Plan and temporary accommodation from the themes raised in this response:

Temporary Accommodation and Human Rights

- 6.2 The Action Plan references consideration of human rights in implementation. Given the evidence presented by The Ombudsman’s Report in 2021 and the evidence presented in this submission, Tai Pawb would question how successfully this human rights approach is being delivered and whether legislative change (i.e. a right to adequate housing) is required to ensure this happens.

Temporary accommodation and lived experience

6.3 The Action Plan states “Policy, service delivery and practice should be informed and shaped in a co-productive manner and by those with lived experience.” Given the evidence in this submission and those of others including Shelter Cymru, Tai Pawb would encourage the continued and amplified use of lived experience to shape service delivery. It is crucial that those who receive services and are accessing temporary accommodation – no matter how brief – are given a voice in shaping what it looks like. Genuine co-production can hopefully lead to a decrease in the use of/length of time spent in TA.

Improved use of data

6.4 The Action Plan refers to “Improving understanding of homelessness and preventative actions through better data and communications/language”. Tai Pawb feel this goal would be supported through better collection of data around temporary accommodation, as referenced in the earlier section of this response.

Smoothing pathways for groups at risk of harm

6.5 In ensuring homelessness is “rare”, the Action Plan references “smoothing pathways for groups at risk of harm”, a group which includes refugees. Tai Pawb’s experience is that there are currently a high number of refugees (amongst other groups) in temporary accommodation, and often the least suitable type such as B&Bs. In being consistent with this desire approach, we would urge that alternative housing options are explored, as highlighted in this submission (joint work between Tai Pawb, The Wallich, Housing Justice Cymru, Oasis and others, as funded by Comic Relief – link above).

The case for good quality supported accommodation

6.6 While rapid rehousing seeks to rehome people as soon as possible, there may be circumstances where longer stays in supported accommodation are beneficial. For instance, people who have suffered from long-term substance use, or women who have been sexually exploited. Rapid Rehousing may lead to less temporary accommodation, but this may not suit everyone. Maintaining investment in good quality supported

accommodation will need to continue, despite rapid rehousing, to ensure these housing options are available for those who need it.

A right to adequate housing in Wales

6.7 The Action Plan sets out a pathway to end homelessness in Wales. Yet the recent increase in use of temporary accommodation, refugee crises and economic recession mean it will be challenging to meet the goals included in this Action Plan. We feel the last few years have shown how challenging it is to resolve the most intractable issues, and very often progress can be threatened by external constraints. While current legislation and policies have made some impact in recent years but haven't ended homelessness yet and given the context of the likely policy environment of the coming decade, and in our perspective seem unlikely too. Instead, Tai Pawb feels that to capitalise on the progress made in recent years to fully address homelessness and inadequate housing, we need to incorporate a right to adequate housing into Welsh law. Doing this will provide a long-term policy and legal framework for all partners to work towards to ensure everyone has a safe, affordable and suitable home. Without this change, there is a risk each future crisis will hit us without a sustainable system or framework in place, and we end up using less effective methods to support people, such as temporary accommodation, which we know are costly and sometimes counterproductive. We look forward to working with the Welsh Government and all partners on the forthcoming Green and White Paper's which will examine this.