

HSHAWB 42 Housing Justice Cymru

Senedd Cymru | Welsh Parliament

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

Bil Digartrefedd a Dyrannu Tai Cymdeithasol (Cymru) | Homelessness and Social Housing Allocation (Wales) Bill

Ymateb gan: Housing Justice Cymru | Evidence from: Housing Justice Cymru

Homelessness and Social Housing Allocation (Wales) Bill

Senedd Local Government and Housing Committee Consultation

A response from Housing Justice Cymru

19 June 2025

About Housing Justice Cymru:

Everyone has the right to a home that meets their needs. The lack of a safe and stable home significantly impacts people's lives. Solutions led by local communities, in strong partnership with the voluntary, community, and public sectors, along with individuals who have lived experience, must be central to changing the housing system.

Our vision is of a community where everyone has a safe and stable home, and feeling they belong.

Our purpose is to unite diverse communities to build personal connections, help people out of homelessness, and create justice in the housing system.

Our values are inspired by the Christian principles of **love**, **nurture**, and **partnerships**.

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1. Overview

- 1.1 Housing Justice Cymru welcomes the opportunity to respond to this important consultation on the Homelessness and Social Housing Allocations (Wales) Bill. We commend the Welsh Government's clear commitment to ending homelessness and creating a compassionate, preventative, and rights-based homelessness system. We particularly welcome the collaborative approach taken in developing the Bill, especially the involvement of Cymorth Cymru and its members and the voices of people with lived experience. However, we believe there are areas where the legislation can go further to meet the needs of sanctuary seekers and to better enable community-led responses to homelessness.
 - 1.2 Housing Justice Cymru delivers vital support to people seeking sanctuary through its Hosting Project and Ukraine Refugee services. The Hosting Project operates in areas including Cardiff, Newport, and Wrexham, where it matches individuals left destitute by the UK immigration system with volunteer hosts who offer a spare room and a safe, welcoming environment. Hosts are carefully vetted and trained, with Housing Justice Cymru providing ongoing support throughout the placement. This community-based approach not only prevents rough sleeping and destitution but fosters mutual understanding and solidarity across cultures.
 - 1.3 Housing Justice has provided over 75,000 safe nights across Wales and London for people seeking sanctuary. Over the past 3 years, HJC has developed Hosting provision as an accommodation solution, facilitating over 60 placements for people to access safe, short-term homes in Wales. Our Sanctuary Support Officers provide ongoing face-to-face support for the sanctuary seekers hosted through our network.
 - 1.4 Additionally, we have supported over 160 Ukrainian Refugees since 2023, helping them to secure permanent accommodation, and assisting the transition from hosting placements to social or private homes. We provide culturally appropriate support to enable people to rebuild their lives in the UK, through creating a sense of connection with their new community, fostering a sense of belonging. Housing Justice Cymru also
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plays a key role in supporting refugees arriving under the Welsh Government's Homes for Ukraine scheme. As many initial hosting arrangements and placements in welcome centres come to an end, the organisation helps Ukrainian families transition into the private rental sector. This includes offering

tenancy support, liaising with landlords, and assisting with language barriers through bilingual staff. Both services reflect Housing Justice

Cymru's commitment to building a nation of sanctuary, where displaced people are met with dignity, compassion, and real opportunities for a stable future.

- 1.5 Housing Justice Cymru also provides our Citadel project in Swansea, Neath Port Talbot, Wrexham and Newport. Citadel is a volunteer-led homelessness prevention project which supports people experiencing, or at risk of homelessness, to find and/or sustain their tenancies and establish a home. Once volunteers are recruited, trained and DBS checked, Citadel Co-ordinators match them with a person referred to Citadel for support. Co-ordinators and volunteers work closely with people who have been referred, identifying their needs and providing personalised support.

- 1.6 Citadel was initially set up to support guests following their move on from Night Shelters. The need for further support, during the initial months of obtaining a tenancy was highlighted by those we support with lived experience of homelessness. Further feedback from people experiencing homelessness showed that more tailored support was needed, which focuses on the person and 'what matters' to each individual. As such, Citadel volunteers provide support to individuals in a flexible way that responds to their specific needs. Volunteers are rooted within their community and help the person to build a sense of belonging.

Key points:

- Wales cannot transform its approach to homelessness and end homelessness for everyone if sanctuary seekers (newly granted refugees and
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asylum seekers) cannot fully access the rights and support laid out in the Bill.

- Wales cannot be a Nation of Sanctuary or achieve its outcomes set out in the Strategic Equality and Human Rights Plan 2025 to 2029 if we continue to allow people with no recourse to public funds (NRPF) to be destitute on our streets without access to homelessness services or housing.
- To prevent and break the cycle of repeat homelessness, models that deliver a community response to ending homelessness should be rolled out across Wales to capitalise on the added value that harnessing the strengths of the community can bring – both in terms of creating an increased sense of community belonging and the added value delivered to the well-being of volunteers.
- Homeless prevention and support go beyond housing; services such as legal advice and language support are equally important for people to find and sustain a tenancy.

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

- 2.1 Wales is facing a deepening homelessness crisis that urgently calls for new and robust legislation. Over 11,000 people are living in temporary accommodation across the country—an all-time high that includes a growing number of children and families. People trapped in temporary accommodation often remain in this limbo for months, even years, as the supply of affordable, permanent housing fails to meet demand. Adding to this is the number of people who cycle back into homelessness due to inadequate follow-up support, revealing critical gaps in the current system.
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- 2.2 Therefore, Housing Justice Cymru welcomes the new legislation as critical action is needed if we are to ensure that homelessness is rare, brief and unrepeatable. However, we are concerned this Bill does not contain provisions that respond to the needs of sanctuary seekers in Wales, particularly those who are made destitute by the UK immigration system. For those sanctuary seekers who are left with no recourse to public funds and no clear route to stability, they remain some of the most vulnerable people in Welsh society. With no clear pathway to secure housing, Wales's ambition to be a Nation of Sanctuary remains just a 'notion' of sanctuary instead.
- 2.3 Whilst there is much in the proposed legislation that we welcome, this Bill must be further strengthened to ensure that the needs of newly granted Refugees and Asylum Seekers are addressed as we cannot end homelessness for everyone in Wales if we do not include sanctuary seekers. Similarly, we cannot achieve the National Equality Objectives set out in the Welsh Government's [Strategic Equality and Human Rights Plan 2025 to 2029](#) of creating a Wales where has equitable access to high quality public services and where their human rights are protected, promoted, and underpin all public policy if our legislation to end homelessness omits sanctuary seekers.

3. What are your views on the provisions set out in Part 1 of the Bill - Homelessness (sections 1 -34)? In particular, are the provisions workable and will they deliver the stated policy intention?

- 3.1 We welcome the proposal to abolish both priority need and the intentionality test. This represents an important step towards a rightsbased approach to homelessness where support is provided based on need, not legal categorisation. However, we are concerned that these changes will still not enable many asylum seekers – particularly those with No Recourse to Public Funds (NRPF) condition – to access secure accommodation and support. This risks perpetuating a two-tier system
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in which sanctuary seekers remain at high risk of street homelessness, destitution, and exploitation.

- 3.2 The Welsh Government's Nation of Sanctuary Plan and its ambition to end homelessness for everyone are laudable. However, this legislation falls short of those goals if it does not address the structural exclusions faced by those seeking sanctuary. If we are to truly become a Nation of Sanctuary, our homelessness legislation must respond to the needs of sanctuary seekers, and ensure they are not left without access to safe housing or support.
- 3.3 We strongly support the proposed extension of the definition of "threatened with homelessness" from 56 days to 6 months. Early intervention is crucial to avoiding the trauma, instability, and cost of homelessness. However, it is vital that this provision translates into practice with local authorities resourced to undertake prevention work with individuals at the point at which they present. An unintended consequence of this extension could result in individuals having to wait even longer for an intervention if current practice continues where a person is required to wait until the end of the prevention period before being provided with housing or support.
- 3.4 At Housing Justice Cymru, our Citadel project demonstrates the transformative impact of sustained, early support in preventing homelessness. Through mentoring, community support, and tailored tenancy sustainment work, Citadel empowers individuals at risk of losing their home to stabilise their circumstances and build resilient lives. Crucially, it also enables communities to play an active role in ending homelessness. We encourage Welsh Government to embed the value of such preventative, relational support models in the implementation of this new prevention duty.
- 3.5 As capacity is stretched, people with low to medium support needs often fall through the gaps. As a result, more and more people are reaching crisis point. A recent report from the Bevan Foundation highlighted that around 20% of people in Temporary Accommodation have been through statutory homelessness services within the last 12
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months¹, indicating that people were unable to maintain a tenancy following Temporary Accommodation, possibly due to a lack of support. There is a missed opportunity if adequate resources are not directed towards ensuring that homelessness is not repeated to help ensure that people leaving Temporary Accommodation, especially those with low to medium needs, are supported to rebuild their lives within their new community. The additional benefit of a model like Citadel which uses volunteers to support those with low to medium support needs is through the way in which it harnesses the strengths of a community-led response, providing an increased sense of belonging for both the individuals in need of support and the volunteer. Citadel not only prevents homelessness for the people being supported but it also serves as a preventative mechanism for the wider population in terms of promoting well-being and reducing loneliness and isolation.

- 3.6** It is vital also that sanctuary seekers can access support to prevent homelessness. Newly granted refugees in Wales face significant hurdles leaving Home Office accommodation, even with the introduction of a new

56-day “move-on” extension. With only eight weeks to secure permanent housing, they face significant barriers in addition to the barriers faced by anyone trying to secure housing in the current housing emergency.

Despite the Home Office’s pilot extension from 28 to 56 days until June 2025, administrative delays and errors—such as late or incorrect delivery of Biometric Residence Permits, e-Visas, or notices to quit— further shortened the effective timeframe, leaving many without crucial

documentation when support ends. As a result, a high proportion of newly recognised refugees require urgent homelessness support.

- 3.7** Although the Welsh Government has limited influence over Home Office policy, action must be taken if Wales is to be a Nation of Sanctuary. As previously stated, we cannot end homelessness in Wales unless we end it for everyone. To exclude sanctuary seekers from the rights and

¹ <https://www.bevanfoundation.org/wp-content/uploads/2024/09/Nowhere-to-call-home-living-intemporary-accommodation-2.pdf>

protections outlined in the Bill undermines Wales's commitment to becoming a Nation of Sanctuary and to equality and human rights.

- 3.8 Whilst we understand the pressures facing local government, it is disappointing to see the 'local connection' test remain within a Bill aiming to transform Wales's approach to homelessness. Our work with Ukrainian refugees has shown that newly arrived individuals often need to relocate to areas where they have family ties, cultural networks, or employment opportunities. Forcing people to remain in areas without these connections increases the risk of isolation, poor integration, and housing instability.
- 3.9 Whilst the White Paper proposed additional exemptions that could have been further extended to include refugees, this opportunity has been missed in the Bill. For refugees who are dispersed without choice across the UK, the retention of the local connection requirement without an exemption for refugees will not support people to rebuild their lives in communities where they want to live. The requirement undermines the policy intentions of enabling integration and creating a Wales where everyone has the opportunity to prosper, as set out by the [Strategic Equality and Human Rights Plan 2025 to 2029](#) and the [Anti Racist Wales Action Plan \(ARWAP\)](#) which includes the Nation of Sanctuary Action Plan.
- 3.10 If the Bill is to retain a local connection requirement, we strongly urge the Welsh Government to include an exemption for refugees and asylum seekers in the Regulations that will accompany the "local connection to Wales" test to determine entitlement to the section 75 housing duty. This would be a compassionate and practical step toward inclusion and integration and would be consistent with Wales's stated commitments to sanctuary and social justice.
- 3.11 We support the introduction of Section 21 to create a new duty on specified public authorities to identify where individuals may be homeless or at risk of homelessness, and then seek their consent to make a referral
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to the local housing authority on their behalf and believe it is vital to strengthening early intervention and cross-sector collaboration. However, we urge that this be accompanied by appropriate training and resourcing for all public services, particularly mental health services, which must be equipped to understand and respond effectively to the needs of people at risk of or experiencing homelessness. For this duty to be meaningful, it must be underpinned by a culture shift across services—recognising housing as a fundamental building block of wellbeing.

- 3.12 The amendment to the Housing Wales Act 2014 to give applicants new rights of review, including an assessment of support required to retain accommodation or overcome barriers to living independently is also welcome. As well as highlighting the need to consider models like Citadel that enable a community response to homelessness provision, this provision may be particularly useful in enabling housing and support to be provided to sanctuary seekers with the no recourse to public funds condition attached to their immigration status.
- 3.13 A recent [legal briefing by Fairways Scotland](#) sets out steps that national and local government in Scotland can take within their devolved competencies to mitigate the harm caused to by UK immigration policy and this extends to housing in many cases. Wales has an opportunity to lead the way in its response to ending homelessness amongst asylum seekers through the provision of accommodation but also through support to help individuals regularise their immigration status.
- 3.14 For people with no recourse to public funds, access to specialised immigration legal advice significantly increases the likelihood of a successful application – one that can open the door to accessing public funding such as housing benefit. However, a recent [report by the Bevan Foundation](#) highlighted that Wales has lost 60% of immigration legal aid, dropping from 15 to just 6 physical locations by 2023. For the people Hosted by Housing Justice Cymru, wait times for a first appointment with a lawyer can often be as long as 12 months.
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- 3.15 We warmly welcome the ongoing commitment to involving people with lived experience in shaping this legislation. The involvement of Cymorth Cymru and its members has been a clear strength of the process so far. We do, however, question the extent to which sanctuary seekers—including asylum seekers and refugees—have been directly involved in the development of this Bill. Their lived experiences of destitution, exclusion from public services, and community-led support models offer valuable insights that must not be overlooked. We encourage the Welsh Government to ensure that these voices are included meaningfully in the final stages of the Bill’s development and in ongoing policy design and implementation.

4. What are your views on the provisions set out in Part 2 of the Bill – Social Housing Allocation (sections 35 – 38)? In particular, are the provisions workable and will they deliver the stated policy intention?

- 4.1 Proposals under Section 35 to give local housing authorities the discretion to decide what classes of person are or are not “qualifying persons” to manage waiting list figures are concerning. Without further detail, it is unclear to what extent this will disproportionately impact certain people, including those with protected characteristics.
- 4.2 Additionally, allowing a local housing authority to disqualify a person from allocation if they, or a member of their household, has been guilty of “unacceptable behaviour” serious enough to make them unsuitable as a tenant needs carefully consideration and monitoring to protect against biases and discrimination.

5. What are your views on the provisions set out in Part 3 of the Bill – Social Housing Allocation (sections 39 – 43 and Schedule 1)? In particular, are the provisions workable and will they deliver the stated policy intention?

N/A

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

- 6.1 The current housing crisis presents a real barrier in achieving the aspiration set out in this Bill. Without addressing the shortage of homes, we will not ensure that homelessness is rare, brief and unrepeatable.
- 6.2 Housing Justice Cymru's Faith in Affordable Housing (FiAH) initiative seeks to alleviate Wales's housing crisis by converting underused church land and buildings into genuinely affordable homes. A 2025 joint report with the Bevan Foundation, [Regenerating Communities: Affordable Homes from Unused Faith-Owned Spaces](#), reveals how declining congregations have left thousands of worship sites dormant—and how repurposing these properties offers a powerful solution to Wales's acute land shortage and rising homelessness. The joint report argues that even a modest scale of development across Wales could yield as many as 7,000 extra affordable homes by converting disused churches, chapels, and other community buildings. By transforming buildings left to decay into vibrant, affordable housing, the project not only provides new homes for those in need but also revitalises communities, eases financial burdens on churches, and challenges policymakers to adopt flexible, justice-driven land-use strategies.
- 6.2 The Explanatory Memorandum states that prevention rates have stagnated and dropped significantly in the last two years since the introduction of the Housing Wales Act 2014 and that repeat homelessness is high and the system is very expensive to deliver. We need to think differently about how we prevent homelessness and how we break the cycle of repeat homelessness. We also need to ensure that people with lower-level support needs are not overlooked.
- 6.3 At Housing Justice Cymru we are passionate about enabling community responses to addressing homelessness. Our Citadel model is a volunteer-led homelessness prevention project which supports people experiencing, or at risk of homelessness, to find and/or sustain their tenancies and establish a home. Once volunteers are recruited, trained and DBS checked, Citadel Co-ordinators match them with a person
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referred to Citadel for support. Co-ordinators and volunteers work closely with people who have been referred, identifying their needs and providing personalised support.

6.4 Citadel volunteers provide support to individuals in a flexible way that responds to their specific needs. Volunteers are rooted within their community and help the person to build a sense of belonging. Citadel is sometimes described as ‘people helping people’ due to the human response provided by our volunteers, in contrast to support that feels like a service. Our volunteers are matched with individuals at risk of or experiencing homelessness, and through this process a relationship is established which is different from that of a relationship between a traditional support worker and their client. This is underpinned by the mutually beneficial nature of the relationship, as our volunteers themselves report an increased sense of community belonging and a sense of purpose from the support they provide to the person in need of support.

6.5 Despite the impact demonstrated by Citadel, expanding the model to other local authorities across Wales has been a challenge. The outcomes achieved for individuals experiencing or at risk of homelessness together with the added benefits to wellbeing experienced by volunteers and the impact this has on both the individual and the volunteer’s sense of community belonging, it is hard to understand why such models aren’t expanded across Wales.

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

N/A

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

8.1 As previously stated, whilst we support the proposed extension of the definition of “threatened with homelessness” from 56 days to 6 months,

local authorities must be resourced to undertake prevention work with individuals at the point at which they present. Individuals should not have to wait even longer for an intervention if current practice continues where a person is required to wait until the end of the prevention period before being provided with housing or support.

- 8.2 Additionally, if the Bill does not address the needs of newly granted refugees and, in particular, asylum seekers who have been made destitute by the UK Immigration system, we will fool ourselves into believing that Wales wants to end homelessness for everyone. We will fail to deliver on our promise to be a Nation of Sanctuary and fail to uphold our commitment to equality and human rights.

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

N/A

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

N/A
