



White Paper on Ending Homelessness in Wales

Wales Safer Communities Network response, submitted 15/01/2024

1. Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes

2. What are your reasons for this?

The Network welcomes the proposals in the white paper and the Welsh Government's ambition to end homelessness. The focus on a more collective public service approach with core teams across public services working together is supported as is the focus on greater partnership working with better access to referral mechanisms and the proposals to include additional groups to the list of exemptions in terms of connections to communities, particularly the inclusion of veterans.

However, there are concerns amongst Network members with the ability to deliver these proposals, particularly in terms of the availability of housing stock both private rental and social housing and the additional pressures on existing services, as well as the need to ensure that there is a comprehensive programme of training and support for practitioners.

3. Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

None identified.

4. Do you agree with our proposal to abolish the priority need test?

Yes

5. Do you agree with our proposal to abolish the Intentionality test?

Yes

6. Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

The Network welcomes the aim to move towards a person centred approach. We agree with the proposals and the suggested additions to the list of exemptions, particularly the inclusion of veterans and co-habitees and those at risk of or subject to domestic abuse. The Network also notes the considerations around "special circumstances" criteria for exemptions and would support the list of proposed groups, as well as the strengthening of the end-to-end reconnection service where



applicable. One area of concern for the Network is the additional demands and costs these proposals would place on existing services and the need to understand the impact of these changes prior to implementation.

7. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

None identified.

8. Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes. The Network agrees to these proposals in principle as they identify that the causes and consequences of homelessness are wide-ranging and require a collective response from a variety of partners. The Network would emphasise the need to develop a comprehensive and coherent training programme to support colleagues in implementing this approach as well as establishing a clear understanding of the additional demand it would create.

9. Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

We agree with the list of proposed relevant bodies and the consideration to include schools. We also agree with the suggested aim to include non-devolved bodies – as listed – in order to promote a collective partnership approach to reducing levels of homelessness.

10. In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

Yes

11. What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

The move to a wider public service approach will require additional training and guidance to ensure there is a consistent approach from all stakeholders and to ensure that there is clear understanding of roles and responsibilities.

12. In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

The Network welcomes this proposal as individuals with complex needs require access to services to regulate their lives to maintain their accommodation. The aim



to expand this to a wider public service responsibility is fully supported by the Network as there is currently real concern across Councils in Wales with regard to maintaining current levels of service provision by themselves.

13. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

None identified

14. Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

None identified

15. What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

Nothing additional identified

16. Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

Whilst the aim of the proposals is welcomed, the main challenges relating to available housing stock and the imposition of additional legislation will add to already stretched service provision which may impact on current service levels and on those that require support.

17. Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

We agree with the proposals to strengthen existing corporate parenting responsibilities in order to provide effective support but in doing so there needs to be an acknowledgment of the current pressures and challenges on service provision, and the wider aim of the legislation to ensure that a more collective approach is required so that the focus to support individuals is not just the remit of the local authority.



18. Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts?

We agree that 16 and 17 year old should be allowed to hold occupation contracts and would reflect the rights and responsibilities that already exist for individuals within this age bracket.

19. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

None identified.

20. To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

We agree in principle with the proposals to increase the suitability and standards of accommodation. However, as the success of this approach is dependant on the capacity of current housing stock levels to meet these new levels of suitability, there is uncertainty whether ability to meet the demand created by these new suitability standards will be achievable in the short term.

21. To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

We agree in principle with the proposal of ensuring people experiencing homelessness are allocated long-term suitable accommodation as quickly as possible. However, as the consultation points out, there is not enough social housing to meet the needs of those on waiting lists so whilst the ambition is welcomed, the reality may mean that these requirements may create additional pressure and tension between local authorities and RSLs, when the aim is to improve that relationship.

22. To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

Whilst the proposals around short-term availability and the associated safeguards are welcome as they provide flexibility and additional options to support those in need, there needs to be a clear understanding of the additional demand this would create as well as the availability of these additional housing options.

23. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to



access to housing. Are there any costs and benefits we have not accounted for?

None identified

24. To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

The ambition set out in the White Paper is welcomed and the general aims of the proposals set out in the White paper are supported. However, as the consultation highlights, they are being proposed in an environment which is exceptionally challenging for public services in Wales and there needs to be careful consideration of how these changes will be implemented on already stretched services. The White Paper sets out a clear ambition for a more a more collective approach to reducing homelessness in Wales and the Network would suggest that this collective approach is also considered in terms of the implementation of these proposals to ensure that there is no negative impact on current service provision in this area.

25. What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

None identified.

26. The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

None identified

27. What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. a. Do you think that there are opportunities to promote any positive effects? b. Do you think that there are opportunities to mitigate any adverse effects?

The ability to have access to information in Welsh will help reduce stress and anxiety of those who need support to navigate the processes involved.

28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

The Network supports the ambition and principles proposed within this consultation, both in the aim to develop a collective approach to reducing homelessness and the measures to widen the criteria for inclusion. The main concern from Network members is the ability to deliver these proposals considering the pressures and



challenges on existing services and the current level of housing stock which will be a defining element in delivering these proposals. With this in mind, Network members have identified that to maximise success, there could be a phased approach to implementing these proposals to reduce impact on existing services, provide effective support to those who need it and create a long-term sustainable approach to reducing homelessness.

29. Do you live in Wales?

Yes

30. Do you have a business interest in Wales?

n/a

31. Please provide the first part of your home postcode, e.g. CF10

n/a

32. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Mark Brace, Head of the Wales Safer Communities Network

33. Organisation

Wales Safer Communities Network (hosted by WLGA) This is a response on behalf of the Wales Safer Communities Network which has membership from 22 Councils, 4 OPCC, 4 Police, 3 Fire and Rescue Services, Probation, Public Health Wales, Third Sector, Welsh Local Government Association and Welsh Government. This response was developed following an engagement event on the 12 December 2023. Members of the Network may submit their own response with more specific local information and points relevant to them specifically.

34. If you want to receive a receipt of your response, please provide an email address.

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