WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Consultation on the White Paper on Ending Homelessness in Wales

October 2023

CONTENTS

SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

Context

The White Paper, published alongside this IIA, sets out a range of proposals for changes to law, to end homelessness in Wales.

Prior to considering the proposals in this White Paper it may be useful for the reader to familiarise themselves with part 2 of the Housing (Wales) Act 2014 (HWA 2014). This Act provides the current legislative framework which governs homelessness services and is referred to throughout. Many of the proposals within this document relate to reform of this piece of legislation.

At the start of the Covid-19 pandemic, the Welsh Government put additional funding and guidance in place around provision of housing or temporary accommodation for local authorities to ensure that no-one was left without suitable accommodation and support. The Homelessness Monitor: Wales 2021 report funded by Crisis highlighted homelessness as a high priority in Wales before the pandemic, with an independent Homelessness Action Group developing the basis of a high-level Action Plan. However, the 'no one left out' approach implemented during the pandemic has brought the importance of addressing homelessness into sharper focus.

The Ending Homelessness in Wales High Level Action Plan 2021 – 2026 outlines that the housing crisis created by the pandemic has provided a unique opportunity to make radical changes to homelessness prevention systems and processes in Wales.

The proposals set out in this White Paper are based on recommendations and advice provided to the Welsh Government by an Independent Expert Review Panel, convened by the Minister for Climate Change to review existing legislation on ending homelessness in Wales, and to provide specific recommendations for reform. The proposed reforms are rooted in the lived experience of homelessness and, in addition to this, views expressed during engagement events with local authorities, housing associations, third sector organisations have been taken into consideration.

A summary of the proposed reforms

The White Paper will first set out the background and policy context for the proposed reforms before outlining our proposals under the following themes:

- Reform of existing core homelessness legislation.
- The role of the Welsh public service in preventing homelessness.
- Targeted proposals to prevent homelessness for those disproportionately affected.
- Access to housing.
- Implementation.

Impact

This is a draft Integrated Impact Assessment (IIA) of the proposals contained in the White Paper. The draft IIA is a developing document, and we are seeking additional and alternative evidence to help inform our proposals. A revised IIA will be published alongside any future Bill and revised in line with the evolving proposals.

The most significant positive impacts of our proposals include:

- The risk of homelessness is prevented at the earliest possible stage and responsibility for identification and prevention is shared across the Welsh public service.
- The local housing authority offer a person centred, trauma informed service that is led by the needs of the client, wherever possible.
- The system will be easier to access and, for those who need it, will offer more co-ordinated, multi-agency support to meet a range of support needs.
- Standards of temporary accommodation on offer will be improved and further improvement will take place over time.
- We will maximise use of social housing to end homelessness and utilise a range of other options.
- Targeted actions will be taken to improve the experience of those most likely to be affected by homelessness.

Long term

These proposals form part of a long-term transformation process to the homelessness and housing system, as set out in the Programme for Government and Cooperation Agreement. The reforms will support the Welsh Government long term policy aim of Rapid Rehousing (those who are homeless are able to obtain long term housing quickly, increase their own self-sufficiency, and stay housed) and sustain the significant practice change achieved in response to the Coronavirus pandemic.

Prevention

These proposals will support the breaking of negative cycles and identification and mitigation of underlying causes of homelessness through a preventative, partnership working approach. The Strategy for Preventing and Ending Homelessness (2019), states that the Welsh Government's vision is a Wales where we work together to prevent homelessness and to ensure that it is rare, brief, and un-repeated. As pledged in the updated Welsh Programme for Government 2021-26, the proposed reforms aim to "fundamentally reform homelessness services to focus on prevention and rapid rehousing". This will involve identifying those at risk of homelessness and referring to relevant support services for meaningful intervention before cases reach crisis point.

Collaboration

The Welsh Government's Ending Homelessness Action Plan recognises that homelessness is a cross-sector priority and issues relevant to homelessness require an 'all public services' response. We will work with local authorities to introduce a multi-agency response to provide sufficient support services, particularly for those with complex needs.

Involvement

Section 5 of The Well-being of Future Generations (Wales) Act 2015 indicates that a public body must take account of the importance of involving people who reflect the diversity of the population of Wales in making decisions that interest or impact them. Engagement work with those who have lived experience of homelessness has informed the proposed reforms. As the homeless population of Wales is diverse and complex, this engagement has included consideration of the intersection between homelessness and the protected characteristics outlined in the Equality Act (2010).

Integration

The White Paper is grounded in the lived experience of homelessness. Funded by the Welsh Government, Cymorth Cymru have worked with over 300 people who have experienced homelessness, including those living in temporary accommodation, young people, care leavers, survivors of abuse and people in prison. Furthermore, to ensure the voices and experiences of people with protected characteristics informed this work, Tai Pawb were commissioned to undertake focussed engagement work with asylum seekers, refugees, disabled people, Black, Asian and Minority Ethnic people, Gypsies and Travellers, older people and LGBTQ+ people.

We have also undertaken a range of stakeholder engagement work with the third sector, local authorities and Registered Social Landlord (RSLs) and specialist stakeholder engagement on a range of subjects including homelessness and violence against women and domestic abuse and sexual violence, the role of health and social care, mental health and substance use, disability and the Criminal Justice System.

Cost and Savings

A draft Regulatory Impact Assessment (RIA) is published alongside the White Paper, together with this draft IIA. The draft RIA sets out an initial cost and benefit assessment of the options to proposals for changes to law, to end homelessness in Wales.

Mechanism

The proposal is to bring forward primary legislation. A Regulatory Impact Assessment will be completed alongside the Bill.

SECTION 8. CONCLUSION

8.1 How have people most likely to be affected by the proposal been involved in developing it?

The White Paper is rooted in the lived experience of homelessness with over 300 people who have experienced or been at risk of homelessness contributing their insights and expertise to their development.[1]

Cymorth Cymru engaged with people living across Wales, including those living in temporary accommodation, young people, care leavers, survivors of abuse and people in prison across Wales to provide evidence about the reality of being homeless in Wales. [2] To ensure that any intersection between homelessness alongside protected characteristics was identified early, Tai Pawb were commissioned to engage with people with protected characteristics including asylum seekers and refugees, disabled people, Black, Asian and Minority Ethnic people, Gypsies and Travellers, older people and LGBTQ+ people [3]

We also sought to engage with dependent children under 16 in partnership with Children in Wales. Unfortunately, this project was unable to engage directly with children and young people due to sensitivity and ethical issues. Relevant stakeholders were engaged and have informed the White Paper. We hope to commission additional work through the consultation period to engage children and young people.

The following stakeholders have also been engaged: Regional Partnership Boards, The Commission on Welsh speaking communities, NHS strategic planning, Public Health Wales, the Welsh Government Health inclusion group, RSLs, local authorities, the third sector, the Ending Homelessness National Advisory Board and Childrens Commissioning Consortium Cymru.

Engagement with people with lived experience of homelessness will continue, alongside wider stakeholder engagement.

---

[1] Experts by Experience (cymorthexperts.wales)
[2] Experts by Experience (cymorthexperts.wales)
[3] Experiences-of-homelessness-Final-Version-PDF.pdf (taipawb.org)

8.2 What are the most significant impacts, positive and negative?

The reforms also provide an opportunity to generate significant savings for both local housing authorities and their public service partners over the longer term. The reforms will formalise the internationally recognised Rapid Rehousing approach and strengthen evidence-based practice, shown to be most effective in reducing core homelessness. This practice includes maximising prevention efforts, expanding the responsibility for homelessness to the wider public service, increasing social housing allocations to homeless households and providing tenancy support for those who are most vulnerable to repeat homelessness.

The proposed reforms laid out in the White Paper aim to establish a more trauma informed, person-centred approach to the delivery of homelessness services and contribute towards the Welsh Government's goal of ensuring homelessness is rare, brief and unrepeated. In research involving people with lived experience of homelessness and accessing homelessness services, the following common challenges were identified:

- Difficulty in having situations understood or resolved.
- Repetition/reinforcement of past trauma when accessing different services.
- Barriers to self-advocating and/or providing evidence.
- Communication and join up issues between housing and wider public services.
- The need for engagement from external agencies.

One of the main impacts of the proposed reforms is that, through the implementation of personal housing plans, services should become more personalised and allow individuals to have more choice and input in their cases. This should remove some of the aforementioned barriers for individuals around self-advocating and/or providing evidence that could improve their situation. The use of personal housing plans will also promote a more collaborative approach between services and service users, encouraging service users to engage more in their cases and is in line with the Welsh Government's wellbeing objective to involve people.

In addition to this, an extended prevention duty from 56 days to 6 months or when a Possession Notice is received will allow services to strengthen their work around the prevention of homelessness. Under this proposed reform homeless service staff will be able to act sooner to take reasonable steps to secure accommodation or ensure that accommodation does not cease to be available. This will help towards creating a more resilient Wales where housing services are better positioned to address the impacts of crisis situations.

Extending duties to wider public services e.g., health, substance abuse, education, social services etc. should result in improved join up and create a person-centred system where service users can be referred to the correct services to ensure that their

individual needs are managed appropriately. Situations that lead to homelessness or risk of homelessness can also be better addressed through a multidisciplinary approach as homelessness is not just a housing issue and other factors are often involved. Identifying signifiers of future risk of homelessness at an earlier point will allow meaningful intervention to take place earlier. This should cause instances of repeat presentation to local authority housing services to become less frequent as individuals will be receiving the support that they need to sustain accommodation.

Introducing targeted preventative measures for disproportionately affected groups will help to make support from housing and homelessness services more accessible. Proposed reforms that could contribute towards this are the removal of the "priority need" and "intentionality" test and the amendment of the "local connection" test to better allow consideration of protected characteristics and the circumstances of the applicant. The removal of "priority need" and "intentionality" tests will encourage a more trauma informed response to homelessness that does not challenge people to prove their level of need and does not determine people as being deserving or undeserving of help.

The Welsh Government also aims to improve access to housing by proposing the removal of those with no housing need from social housing registers. Although the positive impact of this would be that people with housing need are prioritised and may experience shorter wait times for social housing offers, there may also be negative implications. It is possible that local authority housing staff may face push back from local politicians due to some communities having an interest in retaining people who have lived in the area for a long period of time. Additionally, this change may not have as significant an impact as intended if the correct type of housing stock is not available.

8.3 In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**
- **avoid, reduce or mitigate any negative impacts?**

The proposals set out in the White Paper contribute to a number of the seven well-being goals prescribed in section 4 of the Well-being of Future Generations (Wales) Act 2015, as summarised in the list below:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

The reforms set out in the White Paper offer the opportunity to contribute significantly to a fairer, healthier and more equal Wales, alongside broader a contribution to each of the seven well-being goals and the Welsh Government's well-being objectives, by addressing the inequality of outcome and other difficulties faced by some of those experiencing or at risk of homelessness.

The proposed reforms will assist housing services in implementing a more preventative, trauma informed and person-centred approach. The objectives of this are to maximise choice for service users and improve accessibility of services for those with complex needs. Focusing on the needs of the person first will help to tackle barriers to having specific needs understood. This will contribute towards the commitment of creating a more equal Wales and a more prosperous Wales as it aims to address the difficulties faced by those with protected characteristics, complex needs and past trauma with the goal of ensuring that they are able to achieve equality of opportunity for the support they need.

Poor mental and/or physical health is a notable cause of homelessness, with 33% of homeless people in Wales reporting their current homelessness was caused by a health problem.[4] The impacts of experiencing homelessness on physical and mental health can also be significant and life limiting. Homeless people have higher mortality ratios compared to the general population and are twice as likely to die as the general population from heart attacks and chronic heart disease.[5] The average age of death registered among an estimated 741 deaths of homeless people in England and Wales in 2021 was 46 for men and 42 for women, around 30 years lower than the general population. In relation to mental health, one of the most significant causes of death registered among homeless people aged 20 to 49 years was intentional self-harm.[6] Additionally, a study by Public Health Wales found that developing maladaptive coping behaviours in teenage years, or earlier, could lead to homelessness in later life.[7]

Improving provision of safe, stable environments to live in and multidisciplinary support from public services can help to mitigate negative impacts of homelessness on physical and mental health and manage underlying causes of homelessness related to health. Addressing the health issues associated with homelessness will help us to work towards the well-being goal of a healthier Wales.

---

[4] Watson I, MacKenzie F, Woodfine L and Azam S. (2019). Making a Difference. Housing and Health: A Case for Investment. Cardiff, Public Health Wales.
[5] Watson I, MacKenzie F, Woodfine L and Azam S. (2019). Making a Difference. Housing and Health: A Case for Investment. Cardiff, Public Health Wales.
[6] Deaths of homeless people in England and Wales - Office for National Statistics (ons.gov.uk)
[7] Watson I, MacKenzie F, Woodfine L and Azam S. (2019). Making a Difference. Housing and Health: A Case for Investment. Cardiff, Public Health Wales.

Rapid Rehousing and maximising prevention efforts are among the most effective policies for reducing core homelessness.[8] Moving towards a system that incorporates these two elements among others will help to create a Wales that is more resilient.

A cohesive community is defined as one that is able to adapt to change, focused on the well-being of the people who live there with access to key services and where people can do the things that matter to them[9]. The Welsh Government's commitment to ending homelessness as well as proposals that aim to create a shift towards viewing homelessness as more than just a housing issue will challenge public perspectives around homelessness, promoting more positive relationships and empathy within communities.

In 2020 the UN reported that 1.6 billion people worldwide lived in inadequate housing conditions, with about 15 million forcefully evicted every year, indicating that homelessness is a global human rights issue. [10] The UN highlights preventing and eliminating homelessness as a "minimum core obligation [of States] to ensure the satisfaction of, at the very least, minimum essential levels of each of the rights" under the **International Covenant on Economic Social and Cultural Rights.**[11] By reforming the current legislation to allow for earlier preventative measures to be applied in cases of homelessness, the Welsh Government will be working in accordance with this and demonstrating global leadership in how Wales responds to the issue of homelessness.

8.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

Following the launch of the White Paper, the Homelessness Prevention Legislation Team will engage in a consultation period. All responses to the consultation will be reviewed and used to refine the proposals further as part of the process to develop a range of reforms including legislation in this area. Revised versions of the IIA and RIA will be published to accompany any future Bill. We will conduct regular engagement with stakeholders to discuss emerging issues.

We will develop an implementation plan for the proposals during the legislative development phase, with stakeholders and at its conclusion. This will include monitoring and evaluating impacts.

---

[8] The Homelessness Monitor: Wales 2021 | Crisis | Together we will end homelessness
[9] Cohesive-Wales-Topic-1.pdf (futuregenerations.wales)
[10] First-ever United Nations Resolution on Homelessness | DISD
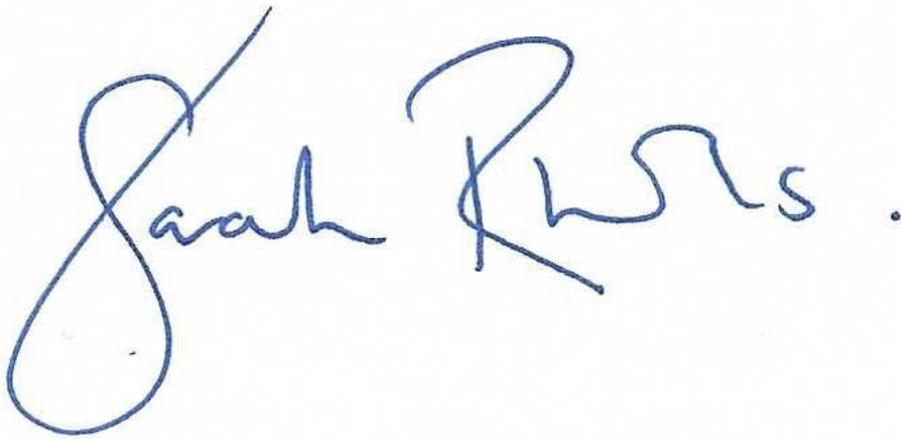[11] Homelessness and human rights | OHCHR

SECTION 9. DECLARATION

Declaration

I am satisfied that the impact of the proposed action has been adequately assessed and recorded.

Name of Senior Responsible Officer / Deputy Director:

Sarah Rhodes

Department: Housing Policy

Date: 2 October 2023

FULL IMPACT ASSESSMENTS

A. CHILDREN'S RIGHTS IMPACT ASSESSMENT

1. Policy objectives

1.1. The White Paper is a step on the journey to meeting a Programme for Government commitment to "*Reform housing law and implement the Homelessness Action Group's recommendation to fundamentally reform homelessness services to focus on prevention and rapid rehousing*". It draws on *The Strategy for Preventing and Ending Homelessness (2019),* the *Ending Homelessness in Wales High Level Action Plan 2021-2026,* the report of the Expert Review Panel and several pieces of research which are set out in the sections below.

1.2. Under Part 2 of the Housing (Wales) Act 2014, people residing with dependent children, young people aged 16 to 17 and young people aged 18-20 who were looked after or fostered at any time while under the age of 18 or who are at particular risk of sexual or financial exploitation are categorised as being in priority need for support to access housing. The White Paper proposes changes to the 2014 Act which aim to fundamentally reform homelessness services to focus on prevention, early intervention and Rapid Rehousing.

1.3. Welsh Government's vision is to create a Wales where the Welsh public services work together to prevent homelessness and, where it cannot be prevented, to ensure that the experience of homelessness is rare, brief, and unrepeated. To deliver this and following a public consultation on the White Paper, a Bill will be developed. The intention of the Paper's proposals is to benefit people of all ages on a prevention and early intervention basis via the enabling of a one Welsh public service, person-centred and trauma-informed system. A whole system, whole person approach will see public sector services working in partnership with housing services to identify those at increased risk of homelessness at earlier stages in order to address individual needs and, where possible, prevent homelessness. Early intervention will help to ensure that children and young people have access to the support they need and, where possible, do not reach crisis stage.

1.4. There are many elements to the White Paper including work to ensure that children and young people are able to live in safe, stable environments, which will have a positive impact on their health, growth, and development. There are specific proposals in relation to:

- clarifying responsibility for duties owed to 16- and 17-year-olds who are homeless or threatened with homelessness
- ending use of the homelessness system as a route out of care
- extending the time period in which individuals can be threatened with homelessness from 56 days to six months or where a possession notice has been served thus increasing time to undertake prevention activity
- the exemption of care experienced young people and families where domestic abuse and other forms of violence and exploitation have been experienced, from the "*local connection"* test.

1.5. The White Paper and resulting legislation will also cover standards and allocation of social housing, with aims to improve the quality and range of temporary accommodation and access to Rapid Rehousing options.

2. Gathering evidence and engaging with children and young people

2.1. Several pieces of work have been carried out of relevance to the proposals in the White Paper. Some of these are referenced below.

2.2. Children in Wales' report on the findings of the Youth Homelessness (under 16) Call to Evidence event in December 2022, outlined sensitivities in reaching out to this group of young people, such as retraumatising them through recounting their experiences. Evidence submitted included Llamau's Upstream Cymru report (2022) which revealed that a majority of local authorities found it difficult to undertake research with 11-16 year olds (the age group covered by Llamau's Upstream Cymru programme) and were unable to provide linked data between education and homelessness. Also, Barnardo's work on homelessness amongst care experienced young people which revealed those living independently under the age of 18 are some of the most vulnerable young people in society. A major finding from the 2022 event was the lack of existing research and participatory work around homelessness with this group of young people. As a result, we will ensure dedicated arrangements with this cohort are made when we design our White Paper consultation programme.

2.3. Cymorth Cymru's Experts by Experience (2023) project, the End Youth Homelessness Cymru, *Don't Let Me Fall Through the Cracks* (2020) report and the Public Health Wales report *Preventing Homelessness in Care Experienced Individuals* (2020) all highlighted considerable barriers to accessing housing for young people. In addition, End Youth Homelessness Cymru's 2020 report *Out on*

the Streets LGBTQ+ Youth Homelessness in Wales , AKTs 2015 research '*LGBT Youth Homelessness: A UK National Scoping of Cause, Prevalence, Response and Outcome (2015)'.*and Tai Pawb's 2023 research '*The experiences of homelessness of people with protected characteristics in Wales'* looked at housing and homelessness challenges relating to LGBTQ+ young people and the other protected characteristics. Throughout the process of finding help to secure housing and trying to avoid homelessness, the following issues were raised:

- low confidence in approaching local authority housing services
- having to repeat experiences to various sector professionals and feeling judged and stigmatised and not supported by the system
- the stretched availability of resources in terms of staffing and funding
- the lack of support including signposting from other parts of the public sector: social services, mental health services/CAMHS, education and youth services
- poor communications between the different parts of the public sector and as a result, with children and young people
- low understanding of the specific needs of LGBTQ+ young people who are shown to be disproportionately represented in the homelessness data with many hidden from the view of public services. Low understanding of gender identity
- people with no recourse to public funds (NRPF) and the complexity of legislation, policy and guidance governing their rights and entitlements at the UK and Wales levels
- the stretched availability of suitable temporary accommodation and the use of places such as night shelters
- conflicts between different parts of the public sector over responsibilities
- the unaffordability of permanent housing

2.4. A major finding was that young people often felt their concerns and needs were not taken seriously and that more could be done to prevent homelessness whether or not the children and young people were part of family groups.

2.5. Related to this, the Wales Centre for Public Policy (WCPP) report on preventing youth homelessness (2018) noted that actions to prevent homelessness among children and young people could be strengthened, supported, enforced, and defended through legislation and social policy. The current emergency-focused response to homelessness was found to be failing young people as opportunities to intervene early are being missed, and services often fail to transition young people out of homelessness quickly. This could potentially be a result of the current 'silo'-organised bureaucracy involved in

these processes, which do not facilitate a whole system response to meeting young people's needs. The same review recommends that services engage with young people early and often in planning processes that address their housing stability and necessary wrap-around support, the removal of time-consuming practices would help in simplifying the system so that more meaningful engagement with service users can take place.

2.6. Shelter's report; The impact of homelessness and bad housing on children's education: A view from the classroom and the Welsh Government report : Absence from school amongst children living in homeless household have also informed the White Paper in relation to the role of education.

3. **Analysing the evidence and assessing the impact**

3.1. One of the main aims of the White Paper is to shift the homelessness system towards a stronger emphasis on prevention and early intervention. As highlighted in the aforementioned research, children and young people feel this is as an area that could be improved on. The research has directly informed the Paper's proposal to extend the currently prescribed length of time to undertake prevention activity from the current 56 days to six months or where a possession notice has been served. A positive effect of this on children and young people is that it will reduce their risk of becoming homeless while preventative actions are taken.

3.2. The proposals aim to remove "priority need" and "intentionality" tests and amend the "local connection" test to better allow consideration of the circumstances of the applicant. The aim of this is to develop a more person-centred and trauma-informed approach to delivering homelessness and housing services that does not challenge people to prove their level of need and does not determine people as being deserving or undeserving of help. This would also have a particularly positive impact on young people over 18, who would no longer need to prove that they are in the priority need category for young people aged 18-20 who were looked after or fostered at any time while under the age of 18 or who are at particular risk of sexual or financial exploitation.

3.3. The White Paper also sets out the aim to explore further, through consultation, whether the Renting Homes (Wales) Act 2016 should be amended to allow 16-17 year olds to be occupation contract-holders, which would broaden the accommodation options available to this group.

3.4. The proposals aim to improve collaborative working and communication between the different public sector services that have a role to play in all people (including children and young people's) lives. The aim is to make homelessness

a shared responsibility across public services, that improved account is taken of the wider life journey including, for example, schools and colleges, mental and physical health and wellbeing, care-experience, substance abuse, interactions with the youth justice system etc. If more parts of the public sector work together then the risks of homelessness can be identified at earlier points.

3.5. The proposals aim to provide greater clarity around where duties to support children and young people rest, with the aim that fewer children and young people will feel that there is a "battle" between services over which part of the public service is responsible for them and at what stage.

3.6. The proposals aim to make Housing Services more accessible to all, particularly individuals with protected characteristics such as those who are young and old, LGBTQ+, Black, Asian and Minority Ethnic people, disabled people etc. A more person-centred and trauma-informed approach necessitates the simplification of processes within the whole system, more frequent communication and improving the accessibility of language used when communicating with all people including children and young people.

3.7. The proposals will also consider allocations arrangements and the standard of temporary accommodation and housing, with the aim of moving towards a process of Rapid Rehousing into permanent accommodation in line with already published guidance. The aim here is to introduce a system where people can access settled accommodation quickly and limit disruptive moves and long stays in temporary accommodation.

4. **What participatory work with children and young people have you used to inform your policy? If you have not engaged with children and young people, please explain why.[12]**

4.1. Participatory work with children was attempted as part of our policy development, in partnership with Children in Wales. Unfortunately, Children in Wales were unable to identify anyone to participate in the work. We are working with research colleagues to identify alternative options to undertake such engagement throughout the consultation period.

4.2. All research referenced here has been used to inform our policy in relation to children and young people, specifically in respect of 16 to 17-year-olds.

---

[12] Article 12 of the UNCRC stipulates that children have a right to express their views, particularly when adults are making decisions that affect them, and to have their opinions taken into account.

4.3. WCPP's 2018 report identified a gap in knowledge related to structural preventative activities. Further research and concept building is needed to better understand the unique effects of particular kinds of structural interventions (e.g., poverty reduction strategies and homelessness prevention legislation) on young people who are homeless or at risk of becoming homeless.

4.4. In our White Paper consultation activities, we will consider WCPP's recommendation above as part of our work to engage with children and young people. We will provide further detail on the arrangements we make to work with these cohorts including working with the CRIA team to identify suitable Third sector partners we can work with, especially those who support these cohorts in relation to the protected characteristics.

5. Analysing the evidence and assessing the impact

5.1. In order to mitigate and/or reduce any negative effects, we will review the CRIA and other impact assessments throughout our work as well as any new research, so that we remain aware of the issues and challenges to the rights of children and young people that could arise. This will ensure that the work being undertaken complies with The Rights of Children and Young Persons (Wales) Measure 2011 in giving due regard to the United Nations Convention on the Rights of the Child (UNCRC) and its Optional Protocols.

5.2. Additionally, the Homelessness Prevention Legislation Team have drafted a Risks and Issues Log that will be updated regularly to consider new risks that may arise as barriers to or results of ongoing work. This includes outlining short-term and long-term measures to manage or mitigate risks and negative effects of reforms to legislation.

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Article 3 (best interests of the child) Article 9 (separation from parents) Article 10 (family reunification) Article 12 (respect for the views of the child) Article 18 (parental responsibilities and state assistance) Article 19 (protection from violence, abuse and neglect) Article 20 (children unable to live with their family) Article 23 (children with a disability) Article 24 (health and health services) Article 34 (sexual exploitation) Article 35 (abduction, sale and trafficking) Article 39 (recovery from trauma and reintegration)	X		Being able to live in a stable, secure home is central to every child and young person's best interests and development. The proposals aim to introduce a one Welsh public service, whole system, person-centred and trauma-informed approach to preventing homelessness which aims to improve the experience of accessing and retaining suitable housing. Creating this approach to reducing the risk of homelessness will give children and young people a greater range of opportunities with a wider range of public services partners to communicate their needs. The introduction of related streamlined processes which improve the accessibility of services in a more individualised way, will help children and young people feel their views are taken more seriously than under the current system. It is the clear intention of the proposals in the Paper that all of the referenced Articles of the Convention are at least met and that children and young people will be supported to experience these rights and entitlements.

6. Communicating with Children and Young People

6.1. Engagement with children and young people will be commissioned through Third Sector organisations. Child-friendly versions of our work will also be produced. Any reports resulting from engagement with and research involving children and young people will be shared with them once they are published.

7. Monitoring and Review

7.1. The Homelessness Prevention Legislation team have drafted an ongoing risks and issues log, which will be updated throughout the course of the work taking place. This will inform changes that need to be made to our approach to the project or project documents in order to mitigate risks. In addition to this, more information around children's and young people's experiences of homelessness and the how the proposals will impact them may become available to us during the timeframe of the work to deliver the White Paper including the consultation process. We will review and update this CRIA document to reflect any emerging information or changes.

B. EQUALITY IMPACT ASSESSMENT

1. Describe and explain the impact of the proposal on people with protected characteristics as described in the Equality Act 2010.

1.1. Homelessness is a complex issue with a range of causes and consequences. Those who experience homelessness are not a homogenous group and their backgrounds and experiences will vary. However, we know that the risk of homelessness can be exacerbated by broader external factors, including the current cost of living crisis.

1.2. We also know that the cost-of-living crisis is likely to have a disproportionate and cumulative impact on some protected groups. The proposals set out in the White Paper will promote equality through improving access to housing services and working to mitigate discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.

1.3. The White Paper on ending homelessness in Wales sets out a range of proposals for changes to policy and the law to ensure homelessness in Wales is rare, brief and unrepeated. The proposals set out in the White Paper are based on recommendations and advice provided to the Welsh Government by an Independent Expert Review Panel, convened by the Minister for Climate Change, to review existing legislation and to provide specific recommendations for reform.

1.4. The panel has considered evidence from people with lived experience of homelessness and experts in homelessness practice, policy and research. Funded by Welsh Government, Cymorth Cymru worked with over 300 people who have experienced homelessness, including those living in temporary accommodation, young people, care leavers, survivors of abuse and people in prison.

1.5. Furthermore, to ensure the voices and experiences of people with protected characteristics informed this work, Tai Pawb were commissioned to undertake focussed engagement with asylum seekers, refugees, disabled people, Black, Asian and Minority Ethnic people, Gypsies, Roma and Travellers, older people and LGBTQ+ people.[13] Tai Pawb's report on 'The experiences of homelessness of people with protected characteristics in Wales' (2023) should be considered alongside this Impact Assessment.

---

[13] Experiences-of-homelessness-Final-Version-PDF.pdf (taipawb.org)

1.6. The proposals within the White Paper are rooted in this engagement work and several are direct responses to the views and experiences of the individuals we have worked with.

1.7. The proposals within the White Paper sustain the significant practice change achieved in response to the Coronavirus pandemic and support the delivery of one or more of our key working principles:

- Homelessness should be rare, brief and unrepeated.
- Homelessness service delivery should be trauma informed and person-centred.
- Those who are homeless should be able to obtain long term housing quickly, increase their own self-sufficiency, and stay housed (Rapid Rehousing).
- Preventing homelessness is the responsibility of the entire Welsh public service.

1.8. These broad principles support a reformed homelessness system that is designed to be person centred and needs led. Such an approach will provide broad positive impacts for anyone applying for homelessness and housing assistance with particular emphasis on individuals experiencing vulnerabilities linked to unmet support needs. These benefits include:

Earlier Intervention and prevention

1.9. The White Paper outlines a range of proposed reforms including changes to core homelessness legislation that create a stronger emphasis on prevention of homelessness. Building on the cultural shift prompted by the Housing (Wales) Act 2014, the reforms aim to support earlier intervention with individuals at risk and better address the wide-ranging causes and consequences of homelessness.

Removing barriers for all applicants

1.10. The White Paper proposes changes to the homelessness system to remove certain "tests" which determine whether particular duties are owed by a local authority under the current legislation. These tests relate to " priority need" and whether a person is "intentionality homeless". Amendments will also be made to add flexibility to the test which determines if someone has a "local connection" to the area in which they are making their application. These tests are not person centred and have led to vulnerable people being excluded from homelessness support and contributed to rough sleeping. Our proposals to

amend these tests directly respond to feedback from service users, particularly those who have experienced homelessness alongside protected characteristics. Should proposals to abolish the priority need and intentionality tests be taken forward into future legislation, the White Paper proposes that the relief duty provided by section 73 of the Housing (Wales) Act 2014 is also removed, as the distinction between those with priority need and those without will no longer apply.

Wider responsibility

1.11. The White Paper proposes duties on the wider public service; to identify homelessness, refer individuals to the local housing authority and to extend duty to cooperate to additional public service bodies. These proposed duties will more effectively identify risks of homelessness for all but we believe they will provide particular benefits for those disproportionately impacted by homeless and those who experience homelessness alongside multiple support needs.

Targeted prevention

1.12. The White Paper contains several proposals which seek to mitigate the disproportionate risk of homelessness faced by particular groups. These proposals are strongly based on our equality impact assessment and the feedback of people with lived experience of homelessness, including those with protected characteristics.

1.13. Through the implementation of the proposals laid out in the White Paper, it is intended that housing services and wider public services will work more effectively together to address issues and complex needs that often present barriers or difficulties such as general and mental health, substance abuse, family and partnership relationship breakdowns, experiences of domestic abuse etc.

1.14. The proposed reforms are broad and complex and form part of a long-term transformation strategy to address the pressures in the housing system. Implementation of the reforms will take some time to deliver and local authorities, RSLs and wider partners will need time to prepare for the reforms, including delivery of training, delivery of IT and processes and system set up.

1.15. Also, there are significant issues around housing supply, which will not be addressed by the proposed reforms. The success of the reform is dependent on increased supply and, in particular development of accommodation for specific groups, e.g. single people and large families.

1.16. Below we set out our assessment of evidence in relation to the experience of homelessness alongside the protected characteristics set out in the Equality Act 2010. However, it should be noted that throughout the development of the White Paper we have noted issues with data quality and evidence related to homelessness and wider protected characteristics and, seeking improvements to this is a proposal within the White Paper.

2. Record of Impacts by protected characteristic:

Age

Children and young people up to the age of 18

2.1. UK-wide research in 2014 found that 20% of 16-25 year olds had sofa surfed during the last year, with 16% having done so for more than a week and 4% over three months. It also found that 26% had slept in unsafe places such as cars, night busses or on the streets.[14] Centre point indicates that 129,000 16-24 year olds were homeless or at risk of homelessness in the UK in 2021-2022.[15] Crisis' 2014 report, '*Nations apart? Experiences of single homelessness people across Great Britain*' found that homelessness generally began at a young age, with 50% of respondents first becoming homeless aged 20 or younger. [16] 41% left their accommodation during their first experience of homelessness due to a non-violent dispute. It also found that 1 in 4 people aged under 21 had never lived in permanent housing. The report also highlights that the earlier a person becomes homeless, the greater the likelihood that they will have 5 or more experiences of homelessness.

2.2. In Wales, in 2021/22, 444 16–17-year-olds and 5,519 18-24 year olds approached local authorities for help.[17] In Wales, as of June 2023 3,346 dependent children aged under 16 were in temporary accommodation.[18]

2.3. Crisis and Cardiff University's Nations apart: Experiences of single homelessness people across Great Britain found that 24% of homeless people had been in local authority care.[19]

2.4. The 2015 study of the Experiences of Young Homeless People (SEYHoPe) found that 50% of young people interviewed felt they had experienced some form of abuse. Young homeless people were 7 times more likely to have experienced emotional abuse and 3 times more likely to have experienced neglect.

---

[14] Cambridge Centre for Housing and Planning Research, Estimating the Scale of Youth Homelessness in the UK, Final Report, 2015.
[15] The Youth Homelessness Databank | Centrepoint | Centrepoint
[16] crisis_nations_apart_2014.pdf
[17] Households for which assistance has been provided by outcome, age and gender (gov.wales)
[18] Homelessness accommodation provision and rough sleeping: June 2023 | GOV.WALES
[19] crisis_nations_apart_2014.pdf

2.5. 32% had been expelled from at least 1 school and 55% had at least 1 out of school suspension. It was also found that 3 in 5 were currently using 1 or more drugs. 9 in 10 met the criteria for at least 1 psychiatric disorder, despite this, only 35% of young people were accessing services.[20]

2.6. A recent report commissioned by the Welsh Parliament Children, Young People and Education Committee highlighted the link between experiencing homelessness and being a care leaver, stating that 1 in 4 care leavers experience homelessness when they turn 18 (Senedd Commission, 2023, p.51). The report highlighted that local authorities that give priority to housing people with a local connection may have a negative impact on care experienced young people who may have moved around a lot due to no fault of their own.[21] End Youth Homelessness Cymru's Don't Let Me Fall Through the Cracks report also highlights that local connection can be a barrier as care experienced young people form relationships in other local authorities, however local connection rules may mean they are unable to live in an area with that personal connection.

2.7. The report mentions that of the 27 care experienced young people they spoke to, 15 felt that a family or relationship breakdown contributed to them experiencing youth homelessness. If young care experienced people aren't able to be accommodated in an area due to local connection this may mean they may not have their support network around them. However, the report mentions that some young people they spoke to believed that living with others who shared their experience could be a positive option for them, but it was acknowledged this may not work for all.[22] This evidence has directly informed our proposals to add additional groups of people to the list of exemptions from the local connection test to allow for non-familial connections with communities and for targeted prevention to mitigate the risks of homelessness for children and young people and care experienced people.

2.8. Case studies in the Study of the Experience of Young Homeless People indicated that access to mental health and substance abuse services was disjointed and suggest it's important that young people may need extra support in terms of

---

[20] Llamau, Study of the Experiences of Young Homeless People, 2015.
[21] Senedd Commission (2023). *If not now, then when? Radical reform for care experienced children and young people.* Welsh Parliament Children, Young People and Education Committee. Available at: If not now, then when? Radical reform for care experienced children and young people (senedd.wales). Accessed 15/09/2023
[22] Don't+Let+Me+Fall+Through+The+Cracks+-+Full+Report.pdf (squarespace.com)

attending appointments to ensure consistency in treatment.[23] Such evidence supports the need for a holistic approach (a key working principle of the reforms) to ensure that a broad range of needs are assessed and met through the homelessness application process.

Working-age population

2.9. A Public Health Wales' report found that those with lived experience of homelessness tended to be younger, with the highest levels of lived experiences of homelessness amongst 25-34 year olds, followed by 35-44 year olds.[24]

2.10. Although homelessness seems to disproportionately impact younger people, older people may face certain health related issues due to their age which may impact on their experience of homelessness. Older people who contributed to research undertaken by Tai Pawb for the Welsh Government, as part of this impact assessment, experienced difficulty in accessing suitable properties from the council when they approached them for support. The lack of supply of suitable accommodation for their needs, meant longer stays in unsuitable or temporary accommodation for some.[25]

Elderly population

2.11. According to the 2021 Census data for Wales, there are more people than ever before in the older age groups, 21.3% of the population are aged 65 years and over (compared with 18.4% in 2011).[26] Our ageing population may lead to more demand on homelessness services to resource suitable and accessible accommodation that meets the needs of an ageing population in the future.

How will you mitigate Impacts?

2.12. The proposed legislative reforms and non-legislative measures will address homelessness amongst a range of ages.

2.13. It is intended that a person-centred approach will include new duties for those working in relevant parts of the Welsh public service to identify risk factors for homelessness and refer a person with one or more of these risk factors to a local

[23] Llamau, Study of the Experiences of Young Homeless People, 2015.

[24] Public Health Wales, Health of individuals with lived experience of homelessness in Wales, during the COVID-19 pandemic
[25] Experiences-of-homelessness-Final-Version-PDF.pdf (taipawb.org)
[26] Population and household estimates, Wales - Office for National Statistics (ons.gov.uk)

housing authority with their agreement and extend the bodies to whom the duty to co-operate applies. This will help to address issues that can potentially lead to homelessness such as leaving care, problems in education, poor mental and/or physical health, access issues linked with protected characteristics etc. and provide the appropriate support for meaningful intervention to prevent risk of homelessness.

2.14. Stays in unsupported accommodation may have detrimental impacts to the mental wellbeing and health of children. These include living in an environment that they have no control or feeling of ownership over and not having enough space and/or freedom to learn, play and develop. Whilst this White Paper will not address housing supply, the proposals relating to systems reform, allocations and suitability alongside the targeted proposals for children aim to address the research findings related to children and young people. Evidence suggests that a particular issue affecting older people is a lack of suitable accommodation for varying ages (Tai Pawb, 2023).[27] The proposed reforms will not directly address supply issues and its success relies on the Welsh Government meeting its parallel commitment to deliver 20,000 low carbon homes for rent in the social sector. However, the proposals do include provision for accessible housing registers which aim to increase efficiency in placing individuals in suitable accommodation.

2.15. Local Housing Market Assessments provide support to local authorities in assessing the local housing need across Wales.[28] There are also a number of other strategic requirements on local authorities and others which relate to planning, supply and stock. There is an opportunity within these reforms to ensure that the needs of the homelessness population are prioritised in this strategic planning.

2.16. Disability (consider the social model of disability[29] and the way in which your proposal could inadvertently cause, or could be used to proactively remove, the barriers that disable people with different types of impairments)

Reasons for your decision (including evidence)

2.17. According to the 2021 Census, 21.1% of people are disabled in Wales, a higher percentage than England, where 17.7% of people were disabled.[30]

---

[27] Experiences-of-homelessness-Final-Version-PDF.pdf (taipawb.org)
[28] Local housing market assessment (LHMA): guidance for local authorities | GOV.WALES
[29] Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search 'social model'.
[30] Disability, England and Wales - Office for National Statistics (ons.gov.uk)

2.18. There is limited evidence related to physical impairments and homelessness in Wales, however there is evidence that your physical health impacts on your risk of homelessness. A report by Cymorth Cymru in 2017 found that amongst respondents who were experiencing homelessness, 27% were "permanently unable to work due to long-term sickness or disability", and another 9% "intend to look for work but are prevented by temporary sickness or disability". Cymorth Cymru's report also highlights that 33% of respondents felt that health problems were a primary or secondary cause of their homelessness.[31] Furthermore, an evaluation of the Crisis Skylight service found 39% of members self-reported a limiting illness or disability on first contact with a Crisis Skylight.[32]

2.19. Research by Public Health Wales suggests that individuals with lived experience of homelessness are also more likely to be managing multiple long-term health conditions, with 13% of people experiencing homelessness alongside 2 or more comorbidities (compared with 3% of the general population comparison group) and 17% with 1 comorbidity (compared with 5% of the general population comparison group).[33]

2.20. Crisis' 2022 'Experiences of the Homelessness Reduction Act 2018-2021' focused on England; however it does provide some insights into disabled people's experiences of homelessness. The report found that 22% of disabled participants felt their needs had been met by Housing Options, compared to 38% of the whole housing research sample. It was found that 57% of people with learning disabilities received information and advice to help with their housing issue, compared to 69% of those without a learning disability.[34]

2.21. Online application processes can be difficult for some people with learning difficulties. Disabled people are found to be more likely to be digitally excluded, which might be because of the inaccessibility of technology, that they lack internet access or have low levels of digital literacy.[35] The Equality and Human Rights Commission report, 'Housing and Disabled People: Wales's hidden crisis' highlights that many disabled people find the processes and systems to apply for accessible

---

[31] Cymorth_Cymru_Health_Matters_report.pdf (cymorthcymru.org.uk)
[32] Crisis Skylight: Final Report of the University of York Evaluation (whiterose.ac.uk)
[33] Public Health Wales, Health of individuals with lived experience of homelessness in Wales, during the COVID-19 pandemic
[34] hra.pdf (localgov.co.uk)
[35] housing-and-disabled-people-wales-hidden-crisis.pdf (equalityhumanrights.com)

homes complex to navigate. It's also been raised that accessing advice and information is increasingly difficult particularly for people with sensory loss.

2.22. There are also reports that the lack of supply of accessible homes means disabled people face longer waiting lists and higher risk of needing to move away from their local area and support networks for housing. Disabled people make up a significant proportion of those living in social housing in the UK, with nearly 1 in 4 (24.9%) disabled people aged 16 to 64 renting social housing, compared with fewer than 1 in 10 (7.9%) non-disabled people in 2021.[36] However, according to an Equality and Human Rights Commission report, disabled people tend to face a longer wait to be housed in suitable accommodation.[37]

2.23. There is currently more demand for social housing than supply allows. This may disproportionately impact on homelessness of disabled people who may be in unsuitable accommodation, including temporary accommodation, whilst waiting for a suitable property. This may also result in people accepting an unsuitable property as it's seen as the best of very few options.[38] This could lead to disabled people experiencing repeat homelessness and coming back into the system again as the property isn't suitable for their needs.

2.24. A further issue relates to the paucity of data available on this issue. Only 15% of local authorities in Wales rated the data they held for understanding the current and future needs of disabled people's housing requirements as good (Equality and Human Rights Commission, 2018).[39] Tai Pawb's report looking at the experiences of homelessness of people with protected characteristics in Wales highlighted an instance where a lack of appropriate data on a property meant a home that was previously discounted by staff as unsuitable when it was in fact suitable.[40]

2.25. Issues around data capture were also reported in Tai Pawb's research. Disabled participants describe a lack of understanding of individual personal circumstances and inaccessibility of forms and paperwork. There were also reports that participants felt their occupational therapist reports were being ignored (Tai Pawb, 2023, p.14). Other research mentions that some disabled people will not necessarily see themselves as being ill or having health problems and may not

---

[36] Outcomes for disabled people in the UK - Office for National Statistics (ons.gov.uk)
[37] housing-and-disabled-people-wales-hidden-crisis.pdf (equalityhumanrights.com)
[38] housing-and-disabled-people-wales-hidden-crisis.pdf (equalityhumanrights.com)
[39] Page 29 research-report-115-housing-and-disabled-people-the-role-of-local-authorities.pdf (equalityhumanrights.com)
[40] Page 13 Experiences-of-homelessness-Final-Version-PDF.pdf (taipawb.org)

respond to 'medical' questions in the same way as others, therefore highlighting the importance of looking at individual circumstances.[41]

2.26. Participants in Tai Pawb's research also indicated that their impairment wasn't prioritised as they tried to access services and felt that it should have been.[42]

2.27. The Equality and Human Rights Commission report indicates that there is a lack of understanding around the requirements for different types of impairments. People with physical impairments may be prioritised over people with learning disabilities or people with mental health conditions. However, there is also a lack of understanding around what physical accessibility means for disabled people, meaning that they may be offered unsuitable properties.[43]

How will you mitigate impacts?

2.28. The Expert Review Panel dedicated a session to the experience of homelessness amongst disabled people and Crisis Cymru ran a stakeholder session on this issue.

2.29. Given that research suggests that disabled people find the homelessness system difficult to navigate, the proposed reforms will look to make homelessness and housing services more accessible and consider how current processes can be simplified to make navigating the system easier. This will include more accessible communication around notification duties. Broader work across the Welsh Government to strengthen national implementation of the social model of disability in the Welsh public service will further support our proposals.

2.30. The reforms will set out to formalise a person-centred approach to addressing homelessness and one benefit of this will be that disabled people feel their needs are addressed.

2.31. Although legislation will not directly address the availability of suitable homes and will have limited impact in addressing long waiting times, Welsh Government have committed to 20,000 low carbon homes for rent in the social sector. Local Housing Market Assessments will also provide support to local authorities in assessing the local housing need across Wales, to ensure the needs of people in Wales, including disabled people are met. There are also a number of other

---

[41] Accessible social housing in Gwent (taipawb.org)
[42] Experiences-of-homelessness-Final-Version-PDF.pdf (taipawb.org)
[43] housing-and-disabled-people-britains-hidden-crisis-main-report_0.pdf (equalityhumanrights.com)

strategic requirements on local authorities and others which relate to planning, supply and stock. There is an opportunity within these reforms to ensure that the needs of the homelessness population are prioritised in this strategic planning.

2.32. The proposed legislative reforms will make provision for Accessible Housing Registers to facilitate stronger local knowledge of accessible stock and its availability to improve housing options for disabled people.

2.33. The work on the reforms must consider whether legislation can play a role in improving data collection and data quality in relation to homelessness and how it intersects with protected characteristics to ensure we know more about the impact and experience of homelessness and the impact of the system, e.g. the experience of disabled people in temporary accommodation.

Gender Reassignment (the act of transitioning and transgender people)

Reasons for your decision (including evidence)

2.34. While the term LGBTQ+ is used here as an umbrella term in line with the Welsh Government's LGBTQ+ action plan and data from third sector organisations, the Welsh Government recognises that Sexual Orientation and Gender Reassignment are two distinct protected characteristics of the Equality Act 2010, and some groups of people sharing either or both of those two protected characteristics sometimes are, or identify as, *LGBTQ+.*

2.35. The LGBTQ+ Action Plan for Wales uses the term LGBTQ+ to refer "*to lesbian, gay, bisexual/bi, transgender/trans people, queer or questioning. Other letters can be added to the acronym to include other groups, orientations and identities, such as I (intersex) and A (asexual/aromantic). The + (plus) in the acronym is used as a shorthand to include and acknowledge other diverse terms people identify with and use to describe their identities and orientations, including intersex, asexual and aromantic people*" (LGBTQ+ Action Plan for Wales 2023, page 60)

2.36. According to Stonewall, 1 in 4 transgender people (25%) have experienced homelessness at some point in their lives.[44] Also, in 2017 1 in 4 (25%) transgender people and 1 in 5 (20%) non-binary people were discriminated against when looking for a house or flat to rent or buy.

---

[44] lgbt_in_britain_-_trans_report_final.pdf (stonewall.org.uk)

2.37. Evidence in Stonewall's 2018 *'LGBT in Britain'* report also suggests that transgender people are at high risk of domestic abuse, with 1 in 5 transgender people and 1 in 5 non-binary people having faced domestic abuse (a potential cause of homelessness) from a partner.[45] This may be further compounded if they lack a family support network, face discrimination from family and/or lack wider social support. In the *'LGBT in Britain: Home and communities'* report it is noted that "more than a third of transgender people (36%) have experienced discrimination or poor treatment in their local LGBT community for being trans" (Stonewall, 2018, p.14).

2.38. Fear of discrimination from homelessness services may be a concern for transgender people when accessing services. The Centre for Homelessness Impact's 2022 report highlights that transgender people report experiencing misgendering and 'dead-naming' (the use of the birth or former name of a transgender or non-binary person without their consent) when accessing services.[46] This may deter people from accessing services and may also mean people will not want to disclose their gender identity to services. Research in Gwent found that only a third of participants were asked about their gender identity when accessing housing services and when they were asked for this information it was at varying points in the system and not always recorded accurately. A participant highlighted that when information was collected it was incorrect and they were misgendered.[47]

How will you mitigate Impacts?

2.39. There appears to be an increased risk of homelessness for transgender individuals. The proposed reforms aim to provide increased support to people who are transgender who find themselves homeless, particularly since the evidence seems to indicate there are certain risks associated with being transgender and homeless. In direct response to feedback provided by young LGBTQ+ young people we have made proposals to adding additional groups of people to the list of exemptions for the local connection test 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.

2.40. The broader proposals related to accessible communication and adherence to the Equality Act 2010 will also benefit those who are transgender.

---

[45] lgbt_in_britain_home_and_communities.pdf (stonewall.org.uk)
[46] Centre for Homelessness Impact, Sexuality, gender identity and homelessness Incidence, experience and evidence of homelessness among LGBTQ+ people, 2022
[47] Page 33 Experiences of homelessness Final Version PDF.pdf

2.41. Throughout the consultation period, we are eager to gather additional insights from stakeholders on how to enhance person-centred approaches to safeguard people who are transgender who find themselves homeless.

Pregnancy and maternity

Reasons for your decision (including evidence)

2.42. A survey carried out by Channel 4 Dispatches with the Royal College of Midwives in 2019 found that 99.7% of participating midwives had seen a pregnant woman who was homeless in the past 6 months. 97% had seen at least 1 pregnant woman in overcrowded or unsuitable accommodation and 97% had seen at least 1 pregnant woman sofa-surfing.[48] Experiencing risk of homelessness or being homeless when pregnant can be stressful, potentially traumatic and will likely have wider impacts on health and wellbeing.[49] Being homeless may also impact a person's ability to engage with antenatal care and midwife/health visitor visits during the post-natal period. Should they have an abortion or miscarriage, the experience of homelessness may impact recovery time and raise additional health risks.

How will you mitigate impacts?

2.43. The proposed reforms will look at the role of the wider public service in relation to homelessness. Early intervention will be a key aim of this and proposed new duty to identify and refer as well as the proposed extended duty to co-operate offer benefits for pregnant people at risk of or experiencing homelessness. Pregnancy is currently a Priority Need category and we are keen throughout the forthcoming consultation period to assess any emerging risks for pregnant people through our proposed reforms to remove this test and mitigate these. It is not our policy intention that any group have a sense that they are de-prioritised through the abolition of priority need and we do not believe this will be the case in practice.

Race

2.44. Evidence suggests that some Ethnic Minority groups are more likely to experience hidden homelessness than others and therefore may not be included in

---

[48] 'Dispatches and RCM find that 99.7% of midwives have seen mothers who were homeless over the past six months'
[49] Barriers and facilitators perceived by women while homeless and pregnant in accessing antenatal and or postnatal healthcare: A qualitative evidence synthesis - McGeough - 2020 - Health & Social Care in the Community - Wiley Online Library

statistics as they are more likely to stay with friends or may be less likely to access homelessness services.[50]

Black, Asian and Minority Ethnic People

2.45. Although there is limited research on homelessness amongst Black, Asian and Minority Ethnic people, there is some evidence that Black, Asian and Minority Ethnic people experience disproportionate levels of homelessness in the UK.[51] Black, Asian and Minority Ethnic households have been found to be 3 times more likely to become homeless than the majority White population. There are also differences between ethnic groups. In Wales, Black people made up 3.1% of homeless applicants in 2021, however they made up less than 0.7% of Wales' population in 2016. Asian people made up 2.4% of homeless applications in 2021, but 2% of the population in 2016. The Mixed group made up 1.4% of homeless applications in 2021, but 0.8% of the population in 2016. The "other" group made up 5.1% of homeless applications in 2021, but only 0.7% of the population in 2016. These figures suggest that although the proportion of Black, Asian and Minority Ethnic populations in Wales are relatively low the percentage of homeless applications within those populations is high.[52] It's been found that relationship breakdown, domestic abuse, overcrowding and financial problems were contributing factors to homelessness in Black, Asian and Minority Ethnic communities.[53]

2.46. Households headed by Black, Asian and Minority Ethnic people have a higher risk of overcrowding in comparison with households headed by White people. Black led households were found to be almost 6 times more likely and Pakistani and Bangladeshi led households were almost 10 times more likely to live in over-crowded conditions.[54] It's been found that that homelessness and other acute housing problems such as overcrowding are more likely to affect Pakistani and

---

[50] "Hidden" homelessness in the UK: evidence review - Office for National Statistics (ons.gov.uk)
[51] Page 6
Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf (hw.ac.uk)
[52] Page 22
Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf (hw.ac.uk)
[53] Page 8
Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf (hw.ac.uk)
[54] Page 17
Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf (hw.ac.uk)

Bangladeshi people than other groups.[55] Census-based analysis has also indicated stable and high levels of adult sharing among Indian, as well as other South Asian groups in England and Wales, which may increase demand for larger housing.

2.47. It is unclear whether experiences of discrimination increase the risk of homelessness or whether Black, Asian and Minority Ethnic people who are homeless are at higher risk of discrimination. However, evidence suggests that experiences of discrimination on grounds of race or ethnicity appears to be associated with elevated risks of homelessness and 1/3 (32%) of Black people with experience of homelessness reported discrimination from a landlord.[56]

2.48. Research undertaken on Bristol residents suggests that complexities surrounding the Universal Credit and social housing systems, combined with racism, creates an environment where hidden forms of homelessness such as sofa surfing can seem a more viable option for some Black, Asian and Minority Ethnic people rather than seeking help from local authorities or social landlords.[57]

2.49. There is a disconnect between the housing needs of Black, Asian and Minority Ethnic people and lack of cultural and religious awareness, language barriers, structural/institutional racism. It may also be the case that Black, Asian and Minority Ethnic people may understand less about the housing systems in England and Wales than their White counterparts.[58]

2.50. Bangladeshi and Pakistani households have been described as two and a half times more likely to experience housing disadvantage. Those who came to Britain between 2007 and 2011 were 25% more likely and holders of other passports 15% more likely to experience housing disadvantage than those born in the UK or UK passport holders, respectively.[59]

---

[55] Page 9
Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf (hw.ac.uk)
[56] Page 7
Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf (hw.ac.uk)
[57] Housing_Report_2020.pdf (squarespace.com)
[58]
Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf (hw.ac.uk)
[59] Slippery discrimination: a review of the drivers of migrant and minority housing disadvantage (st-andrews.ac.uk)

Gypsies, Roma and Travellers

2.51. A recent Senedd inquiry found a lack of suitable supply of accommodation for Gypsies and Travellers in Wales, alongside widescale problems related to the maintenance and repair of sites. The report highlights problems with overcrowding and insufficient toilet and shower blocks.[60]

2.52. The Senedd report also highlights a significant increase in the number of phone calls from individuals who are living on their friends' and families' plots in conditions that are overcrowded, who then want to enter the homelessness system officially and be in hostels.[61] The Improving Race Equality in Housing and Accommodation report found that based on 2011 Census data 28.7% of Gypsy or Travellers were living in overcrowded households, compared with 3.9% for the least overcrowded group in Wales.[62]

2.53. There is some evidence to suggest that domestic abuse is a significant issue in the Gypsy and Traveller community. One study found that around 60% - 80% of women from Travelling communities experience domestic abuse during their lives.[63] There is also evidence that domestic abuse is a cause for homelessness, particularly amongst women.[64] This is further discussed under the 'Sex/Gender' heading.

2.54. Case studies in Tai Pawb's report show that lack of suitable accommodation (permanent or temporary) impacts on people experiencing homelessness who are from the Gypsy and Traveller community. Challenges include a lack of supply of larger homes and a lack of culturally appropriate accommodation. The people who contributed to case studies also report a feeling of being judged and that they were not being treated fairly.[65]

---

[60] Provision of sites for Gypsy, Roma and Travellers (senedd.wales)
[61] Page 12 Provision of sites for Gypsy, Roma and Travellers (senedd.wales)
[62] Page 7 Improving-Race-Equality-in-Housing-and-Accommodation-.pdf (wcpp.org.uk)
[63] Gypsies and Travellers - First Light
[64] crisis_nations_apart_2014.pdf
[65] Experiences of homelessness Final Version PDF.pdf

Asylum Seekers & Refugees

2.55. There is substantial evidence that some vulnerable groups of migrants, particularly those with No Recourse to Public Funds (NRPF), are at acute risk of both homelessness and destitution.[66]

2.56. There has been a sharp rise in those accommodated by the Home Office in Section 98 accommodation (short term placements in hotels awaiting dispersal accommodation), with over 10,000 people in Section 98 accommodation at the end of June 2021.[67] Homeless Link indicates that the granting of refugee status can lead to an increased risk of homelessness. People may be given little notice to leave their dispersal accommodation and may be dealing with trauma, on top of trying to navigate a new country.[68] Asylum Seekers and Refugees may have small or no support networks in Wales. This may mean they could face the more acute end of homelessness and may lack support. They may also not be sure how to navigate homelessness services and may be fearful of presenting to services they may fear presenting due to fear of discrimination.

2.57. People with no recourse to public funds (NRPF) may be at risk of the more acute end of homelessness as they're not eligible for homelessness or housing assistance. As at mid-May 2020, local authorities in England reported having taken in 2,500 people who were not eligible for statutory homelessness assistance (that is, because of their immigration status).[69]

2.58. Citizens Advice research says that 48% on people with no recourse to public funds (NRPF) report living in overcrowded accommodation and 18% have experienced homelessness or housing insecurity.[70]

2.59. Case studies in Tai Pawb's report looking at the experiences of homelessness of people with protected characteristics mention that a number of participants felt that the asylum seeker support ending within 28 days of the granting of refugee status was a primary cause of their homelessness. The quality and supply of appropriate accommodation was also mentioned as an issue. Trauma from previous experiences was also mentioned, alongside friction with staff. The inability to work

---

[66] Bramley, G., Fitzpatrick, S., McIntyre, J., & Johnsen, S. (2022). *Homelessness amongst Black and minoritised ethnic communities in the UK: a statistical report on the state of the nation*. Heriot-Watt University.
[67] Preventing homelessness amongst new refugees | Homeless Link
[68] Preventing homelessness amongst new refugees | Homeless Link
[69] Page 25 Investigation into the housing of rough sleepers during the COVID-19 pandemic (nao.org.uk)
[70] No Recourse to Public Funds - Citizens Advice

meant people didn't feel they were integrating into the community and were unable to access the private rented sector due to finances. Participants felt there was a lack of understanding about the system and some were fearful to contact authorities for support for fear of deportation. There were also language barriers.[71]

2.60. Respondents to the Tai Pawb work report needing to sleep on friends' floors, use emergency accommodation or rough sleeping. One individual felt their life was on hold as the asylum process and sporadic periods of homelessness had gone on for over 10 years. Another individual felt ignored when they presented at Housing Options due to the long wait. They felt their health needs weren't taken into consideration by Housing Options. They also faced difficulties with being turned away from emergency accommodation as they didn't have a bank account and were unable to claim benefits and were turned away from emergency accommodation due to not being able to fund their place.[72]

How will you mitigate Impacts?

Black, Asian and Minority Ethnic People

2.61. Our broader policy aims to create a person centred, accessible homelessness system will bring benefits to Black, Asian and Minority Ethnic communities who appear to disproportionately experience homelessness. The proposed reforms are dependent on creating a greater supply of accommodation that suits the needs of a range of different service users. This is particularly relevant to this protected characteristic as the evidence suggests that Black, Asian and Minority Ethnic people are at higher risk of homelessness, particularly hidden homelessness (e.g. overcrowding). Larger properties will be needed in order to provide culturally appropriate. Such accommodation must also be culturally appropriate; evidence suggests that some Black, Asian and Minority Ethnic people may have reservations of being housed in certain areas due to them feeling that some areas may have a heightened risk of racism. Although the proposed reforms will not directly address the availability of suitable homes, Welsh Government have committed to 20,000 low carbon homes for rent in the social sector. Local Housing Market Assessments will also provide support to local authorities in assessing the local housing need across Wales, to ensure the needs of people in Wales are met. Our proposals related to suitability seek to end long term housing in overcrowded conditions.

---

[71] Experiences of homelessness Final Version PDF.pdf
[72] Experiences of homelessness Final Version PDF.pdf

2.62. Evidence shows Black, Asian and Minority Ethnic people have experienced complexities around the systems, in particular social housing systems, which may result in people not accessing support services. The proposed reforms will consider how we can make housing and homelessness systems more accessible to ensure people understand the systems and feel they can access and navigate them.

2.63. Evidence shows racism has an impact on homelessness. There are actions in the Anti-Racist Wales Action Plan aimed at making organisations more representative of the people they serve. The success of both the Anti-Racist Wales Action Plan and the proposed reforms will have significant positive impacts for these groups.

Gypsies & Travellers

2.64. It is crucial that when considering homelessness and housing need, we are cognisant of the needs of those who have an aversion to bricks and mortar accommodation. Our proposals around exemptions for non-familial connections with communities related to local connection bring benefits to this group alongside the specific proposals we make around culturally appropriate accommodation. These proposals are in direct response to feedback provided during the work of the Expert Review Panel on the experience of homelessness amongst Gypsies and Travellers.

Asylum Seekers and Refugees

2.65. Immigration matters are reserved to the UK Government but we will work with officials in relevant departments to explore options which prevent the homelessness of this group. As we set out in the White Paper, we believe there to be particular value in reviewing the current 28 day cessation notice procedure, which is raised repeatedly in the literature and through our own engagement work. We are also considering broader policy options related to funding and training to strengthen support for this vulnerable group in Wales.

Religion or belief and non-belief

Reasons for your decision (including evidence)

2.66. Data on religion, belief and non-belief and how this relates to homelessness is limited. However, people experiencing homelessness may be unable to practice their religious or cultural practices if they're not in accommodation or suitable accommodation (e.g. with enough space to pray). If someone has presented at housing or homelessness services they may be concerned about discrimination because of their beliefs. Someone experiencing homelessness may also have requirements around where they are housed (either temporary or permanently) due

to the need to be close or have transport links to buildings of importance to them (e.g. churches, mosques). People at risk of or experiencing homelessness may also want to stay in certain areas to be close to support networks from within their religious or faith communities.[73]

2.67. The Census 2021 found that households where all members identified as "Muslim" were nearly four times more likely to be in overcrowded accommodation in comparison to all households in Wales.[74] Occupancy ratings may be influenced by the differing age profiles of religious groups. ONS analysis (Religion by age and sex, England and Wales: Census 2021) found that people who described themselves as "Muslim" had the youngest average age at 27 years, while people who described themselves as "Christian" had the oldest average age at 51 years.[75]

How will you mitigate Impacts?

2.68. As people experiencing homelessness may have a range of religions or beliefs, a suitable supply of accommodation in different areas (e.g. some close to or with good transport links to mosques, synagogues, churches etc) will be necessary. Although legislation will not directly address the availability of suitable homes, we have committed to 20,000 low carbon homes for rent in the social sector. Local Housing Market Assessments will also provide support to local authorities in assessing the local housing need across Wales, to ensure the needs of people in Wales are met.

2.69. In addition it is proposed that additional groups of people will be added to the list of exemptions under the "Local Connection test", 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.

2.70. Due to the potential perception of discrimination that people may fear when presenting to services, the importance of facilitating the person-centred approach which is at the heart of the vision for the proposed reforms, is of enhanced importance.

---

[73] People, Place & Policy Online: Issue 1: The Margins of Public Space - Muslims and Social Housing in England (shu.ac.uk)
[74] Religion by housing, health, employment, and education, England and Wales - Office for National Statistics (ons.gov.uk)
[75] Religion by age and sex, England and Wales - Office for National Statistics (ons.gov.uk)

Sex

Reasons for your decision (including evidence)

Men

2.71. Data from the ONS shows that single men aged between 24 – 49 make up the largest group of people who are experiencing homelessness and seeking help.[76] Crisis' Nations Apart Report has found that most single homeless people are male, making up 83% of this cohort. Their study found that the majority of single homeless people are young single men with multiple support needs.[77] Public Health Wales Research supports this and found that individuals with lived experiences of homelessness tend to be male and younger.[78] The experience of single men is exacerbated by a chronic lack of single person accommodation in Wales.

Women

2.72. *Women and Homelessness; Putting Gender back on the Agenda* highlights research that homeless female participants sought out places that were less visible for safety, such as, public toilets or garages.[79] Such behaviour leads to lower visibility of homelessness amongst women compared to men, which is increased by potential higher experience of sofa surfing, staying with family and friends or in refuge accommodation.[80] Additionally, although men aged 24 – 49 make up the largest group of people experiencing homelessness and seeking help according to ONS data, this data also highlighted that among single parents, the majority of applicants are female.[81]

2.73. Research conducted by Crisis between June 2010 and January 2011 found that 28% of homeless women had spent the night with someone for accommodation, compared to 14% of men. It was also found that 19% of women had engaged in sex work (in comparison with 3% of men) because this offered an opportunity to spend the night with a client.[82]

---

[76] UK homelessness - Office for National Statistics (ons.gov.uk)
[77] Crisis, Nations Apart? Experiences of single homeless people across GB, 2014
[78] Public Health Wales, Health of individuals with lived experience of homelessness in Wales, during the COVID-19 pandemic
[79] Page 168 women-homelessness-putting-gender-on-the-agenda.pdf (shu.ac.uk)
[80] Page 2 Myth_Busting_cVUs0i9.pdf (kxcdn.com)
[81] UK homelessness - Office for National Statistics (ons.gov.uk)
[82] Page 48 the_hidden_truth_about_homelessness.pdf (crisis.org.uk)

2.74. There are links between violence and homelessness amongst women and the experiences of homelessness are often shaped by gender-based violence.[83] Statistically women are more likely to experience domestic abuse than men. The Crime Survey for England and Wales (CSEW) estimated that 6.9% of women and 3% of men aged 16 years and over experienced domestic abuse in the year ending March 2022.[84] Crisis' 2014 Nations Apart report found that 61% of women respondents experiencing homelessness had faced violence/abuse from a partner. They also found that 38% of women were at risk of their children being looked after by someone else, in comparison with 9% of men.[85] This may link to the number of single parent applicants being mostly female as they may have difficulty accessing help and suitable accommodation for their children or less opportunities to share parenting responsibilities.[86]

2.75. Tai Pawb's research reports a case study where a homeless woman who was a victim of domestic abuse risked losing her children in taking up an emergency offer of accommodation.[87] Tai Pawb's report mentions women face challenges regarding safe homes and one participant said services should be more considerate to the housing needs of women suffering from domestic abuse or violence. Another participant had been raped prior to being accommodated in a house of multiple occupancy with 6 men which meant she spent days locked in her room due to fear and trauma but was still waiting for suitable accommodation.[88] Research by Crisis undertaken in 2016 found that of the 72 women who completed their survey, 31% had been sexually assaulted, interfered with or attacked whilst homeless.[89]

2.76. The availability of appropriate accommodation for women has been found to have an impact on women experiencing homelessness. Case studies in the Centre for Homelessness Impact's report highlight that women who have been abused feel unsafe in mixed-sex hostels and this may result in them sleeping on the streets. The report also raised that women escaping violence who are housed outside of their local area and support network may result in them feeling isolated and lacking support. This may also result in people turning down unsuitable offers and experiencing homelessness due to a lack of suitable options.[90]

---

[83] Centre for Homelessness Impact, Women, homelessness and violence: what works?, 2021
[84] Domestic abuse in England and Wales overview - Office for National Statistics (ons.gov.uk)
[85] Crisis, Nations Apart? Experiences of single homeless people across GB, 2014
[86] UK homelessness - Office for National Statistics (ons.gov.uk)
[87] Page 17 Experiences-of-homelessness-Final-Version-PDF.pdf (taipawb.org)
[88] Experiences-of-homelessness-Final-Version-PDF.pdf (taipawb.org)
[89] Research reveals extent of sexual violence against female rough sleepers – womensgrid
[90] Centre for Homelessness Impact, Women, homelessness and violence: what works?, 2021

How will you mitigate Impacts?

2.77. Men are more likely to experience acute homelessness, particularly street homelessness than women. Our proposals seek to strengthen prevention activity and ensure the system is accessible. We believe our proposals to abolish priority need, in particular, will bring positive impacts to single men who did not benefit as much as we had hoped from the 2014 legislation.

2.78. In comparison women may face more hidden homelessness (although data in this area is limited) and experience a dangerous intersecting experience of risk of homelessness and gender-based violence. The Tai Pawb research highlights the need for earlier intervention and more sustainable accommodation solutions. The amount of time waiting for accommodation was an issue in the women's case studies in Tai Pawb's report. The proposed reforms will not directly address supply issues and its success relies on the Welsh Government meeting its parallel commitment to deliver 20,000 low carbon homes for rent in the social sector. However, our proposals around prevention, suitability and removal of the current "tests" which determine what duties are owed by a local authority under the current legislation (i.e. "priority need") will mitigate the impacts describe above.

2.79. Moreover, our proposals in relation to survivors of violence against women, domestic abuse and sexual violence will bring positive impacts for all victims of this type of abuse; mainly women and create a more accessible system

Sexual orientation

Reasons for your decision (including evidence)

2.80. While the term LGBTQ+ is used here as an umbrella term in line with the Welsh Government's LGBTQ+ action plan and data from third sector organisations, the Welsh Government recognises that Sexual Orientation and Gender Reassignment are two distinct protected characteristics of the Equality Act 2010, and some groups of people sharing either or both of those two protected characteristics sometimes are, or identify as, *LGBTQ+.*

2.81. The LGBTQ+ Action Plan for Wales uses the term LGBTQ+ to refer "*to lesbian, gay, bisexual/bi, transgender/trans people, queer or questioning. Other letters can be added to the acronym to include other groups, orientations and identities, such as I (intersex) and A (asexual/aromantic). The + (plus) in the acronym is used as a shorthand to include and acknowledge other diverse terms people identify with and use to describe their identities and orientations,*

including intersex, asexual and aromantic people" (LGBTQ+ Action Plan for Wales 2023, page 60).

2.82. It is challenging to assess the full experience of homelessness amongst LGBTQ+ people as data on people's sexual orientation is not routinely collected across services. It is also the case that some individuals may not feel comfortable declaring their sexual orientation and may be concerned about discrimination.[91] Research in Gwent found that only 8% of participants were sure they were asked about their sexual orientation when asking for help.[92]

2.83. However, some research suggests sexual orientation does impact on the likelihood of experiencing homeless. Stonewall suggests that almost 1 in 5 LGBTQ+ people (18 per cent) have experienced homelessness at some point in their lives.[93]

2.84. Tai Pawb's 2023 report on experiences of those with protected characteristics highlights that LGBTQ+ people can develop strong connections with found / chosen families. Found / chosen families are relationships which are sometimes considered to offer a more important form of support than blood relations as LGBTQ+ people can feel they are able to be themselves and feel more accepted by their found / chosen family. This may be particularly important if an individual faces discrimination at home as a result of their sexual orientation and they may choose to or be forced to move away from the area. The individual may then develop a found / chosen family but if the individual faces homelessness these relationships may not be considered as equal relationships to that of blood relations under the local connection test.[94]

2.85. Gwent's research highlights that experiences of temporary accommodation were mixed amongst LGBTQ+ people. One participant highlighted that a lack of accommodation could lead to repeat and/or hidden homelessness.[95]

2.86. 24% of young people experiencing homelessness identify as LGBTQ+ and there appear to be an intersection between sexual orientation, homelessness and being a young person.[96] This may be as a result of LGBTQ+ people facing

---

[91] Centre for Homelessness Impact, Sexuality, gender identity and homelessness Incidence, experience and evidence of homelessness among LGBTQ+ people, 2022
[92] Experiences of homelessness Final Version PDF.pdf
[93] LGBTQ+ facts and figures | Stonewall
[94] Page 35 Experiences-of-homelessness-Final-Version-PDF.pdf (taipawb.org)
[95] Page 33 Experiences-of-homelessness-Final-Version-PDF.pdf (taipawb.org)
[96] Centre for Homelessness Impact, Sexuality, gender identity and homelessness Incidence, experience and evidence of homelessness among LGBTQ+ people, 2022

discrimination from their family and therefore leaving the family home sooner than they would have if they didn't face discrimination.

2.87. The Albert Kennedy Trust found that 77% of young people believed their sexual / gender identity was a causal factor in rejection from their home.[97] The Albert Kennedy Trust also found that 61% of LGBTQ+ young people felt frightened or threatened by their family members before they became homeless.[98] Research from Gwent highlights that family mediation doesn't always work in such circumstances.[99]

2.88. LGBTQ+ young people experiencing homelessness are more likely to experience targeted violence, sexual exploitation, substance misuse and physical and mental health problems than other homeless young people.[100] 17% of LGBTQ+ young people felt they had to have casual sex to find somewhere to stay whilst they were homeless.[101]

2.89. Homelessness can also affect older LGBTQ+ people. Since the pandemic Stonewall Housing has seen an increase of 70% in people aged 50 or over accessing their services.[102][103] Stonewall reports that LGBTQ+ older people experiences differ to non-LGBTQ+ older people in the following ways: having homophobic landlords, harassment from neighbours and increased loneliness. If an LGBTQ+ older person is at risk of or experiencing homelessness they may not be able to rely on family networks for support and also may be more at risk of homelessness if they are facing discrimination from landlords or neighbours. They may also have requirements to be housed in a specific area which may be seen to be more LGBTQ+ friendly and where risk of discrimination is reduced. This may result in a longer wait in temporary accommodation for a space in their area to become available. They may also face similar issues with local connection and as they're older they may have developed even stronger relationships with found or chosen families.

---

[97] The Albert Kennedy Trust, LGBT YOUTH HOMELESSNESS: A UK NATIONAL SCOPING OF CAUSE, PREVALENCE, RESPONSE, AND OUTCOME
[98] NEW: The LGBTQ+ Youth Homelessness Report | akt
[99] Experiences of homelessness Final Version PDF.pdf
[100] Download.ashx (akt.org.uk)
[101] NEW: The LGBTQ+ Youth Homelessness Report | akt
[102] Stonewall Housing provide housing support to lesbian, gay, bisexual, trans and queer (LGBTQ+) people in the UK.
[103] Why LGBTQ+ people over 50 who experience homelessness need our focus too | Homeless Link

How will you mitigate Impacts?

2.90. The proposed reforms will consider how a person-centred approach can be taken in service provision. This action aims to improve the accessibility of services for people who are LGBTQ+. Also, adopting a more trauma informed approach will help to address the issues LGBTQ+ people may experience with feeling like they are being tested on their level of need or are not being understood due to differences in lifestyle/culture. This will also be beneficial to those who have had traumatic experiences with family relationship breakdowns and/or while homeless and may be at risk of reinforcing said past trauma when presenting to support services and repeating their story.

2.91. In cases where there have been breakdowns of family relationships, LGBTQ+ people may form supportive, family-like friendships or support groups within their community. The proposed reform has considered the local connection test to ensure that this does not disadvantage this group and that different types of support networks/local links are considered.

Marriage and civil partnership

Reasons for your decision (including evidence)

2.92. Across Great Britain single adults comprise around two thirds of people entitled to some form of material homelessness assistance from local authorities, with lone parents comprising the great majority of the remainder.[104] Over 60% of homelessness applications between 2020-2021 in Wales were for single adults.[105] However, if you are married or in a civil partnership and homeless, your living situation may place additional strain on your relationship.

How will you mitigate impacts?

2.93. As part of proposed reforms, the Welsh Government will look to make housing services accessible to all, including those who are married or in a civil partnership. We will look to make sure people who are homeless and married or in a civil partnership have suitable accommodation and are allocated suitable homes through the allocation processes.

---

[104] Page 57 the-homelessness-monitor-great-britain-2022_full-report_final.pdf (crisis.org.uk)
[105] Page 58 the-homelessness-monitor-great-britain-2022_full-report_final.pdf (crisis.org.uk)

Potentially vulnerable groups who share characteristics which are not formally protected under the Equality Act 2010

Low-income households

Reasons for your decision (including evidence)

2.94. The Homelessness and Poverty: reviewing the links report (2014) indicates that homeless people suffer from persistently low income.[106] The Homelessness Monitor: Great Britain 2022 report acknowledges that as disposable incomes fall (through the cost of living crisis) this will diminish the ability of lower income households to pay for food, energy, and other essentials, producing widespread concern about rising poverty across the UK, a key risk factor for homelessness.[107]

2.95. Crisis' 2014 Nations Apart report found that 64% of respondents who had faced homelessness had been unemployed.[108]

2.96. Crisis carried out research looking at an online survey of 2,000 people, who were nationally representative of low-income households in Great Britain (those with an income in the bottom 40% of all household incomes, adjusted for household size and composition). They found that nearly one in four (23%) of householders on low incomes had past experience of homelessness. One in eleven (9%) low-income households said it was likely they would face eviction in the coming winter, which could potentially lead to homelessness. Qualitative interviews were also held with 40 people who had been at risk of or experienced homelessness during 2022. The research findings indicate that those in temporary accommodation were concerned about their living costs once they leave their temporary accommodation, one participant in the research decided to stop bidding on properties due to concerns about being able to heat it.[109]

2.97. Challenges with temporary accommodation were reported in the research, with people reporting having to pay for storage facilities for their belongings, relying on takeaway or pre-prepared meals which were more expensive than cooking, paying for washing their clothes due to a lack of laundry facilities and people facing high travel costs due to where they had been placed were challenges reported in the research.[110]

---

[106] Homelessness_Poverty_FullReport.pdf (hw.ac.uk)
[107] the-homelessness-monitor-great-britain-2022_full-report_final.pdf (crisis.org.uk)
[108] Crisis, Nations Apart? Experiences of single homeless people across GB, 2014
[109] experiences-of-homelessness-during-a-cost-of-living-crisis_full-report.pdf
[110] experiences-of-homelessness-during-a-cost-of-living-crisis_full-report.pdf

2.98. They also found in their research that for many people the cost of living was one of multiple pressures that contributed to them losing their home. There were also instances where homelessness was triggered by factors that wouldn't obviously be linked to money, e.g. relationship breakdown.[111] However, stress on finances could be considered a contributing factor to main triggers for homelessness, such as relationship breakdowns. Practice based feedback suggests that some protected groups will disproportionately and cumulatively feel this pressure.

2.99. The research findings indicate that people on low-income were making large efforts to avoid homelessness, with 23% skipping meals over the previous 12 months to save money and 29% saying they would likely need to skip meals to keep up with their housing costs over the coming winter (2022). This figure rises to 43% among householders with children.[112]

2.100. Many interviewees said they couldn't afford rents in the private rented sector and people said they had limited disposable income or savings for new costs, including deposits and sometimes where 1 months' rent in advance was required as well.[113] In the 'Evidencing the link between the Local Housing Allowance freeze and Homelessness' report it says that an increase in the number of households with a LHA-rent gap is positively associated with a higher number of households in temporary accommodation. It's estimated that for every 1,000 households experiencing a shortfall between their LHA rate and rent, 44 will require temporary accommodation.[114] An inability to access suitable housing that is affordable can sustain homelessness in addition to causing it.[115]

2.101. 'The Homelessness Monitor: Great Britain' (Crisis, 2022) looks at the projected core homelessness by category in Great Britain, 2012-2041 and found that the largest increase in absolute numerical terms would be in sofa surfing. It indicates that drivers of these increases include a decrease in employment numbers, an increase in unemployment numbers and changes in income, poverty,

[111] experiences-of-homelessness-during-a-cost-of-living-crisis_full-report.pdf
[112] experiences-of-homelessness-during-a-cost-of-living-crisis_full-report.pdf
[113] Page 13 experiences-of-homelessness-during-a-cost-of-living-crisis_full-report.pdf
[114] Page 9 Microsoft Word - Evidencing the link between the LHA freeze and homelessness-Full report-pub5Feb20.docx (local.gov.uk)
[115] Housing models and access | Crisis UK

house prices and rents, and expected reduced rates of social lettings as well as the ending of the evictions moratorium in the private rented sector.[116]

How will you mitigate impacts?

2.102. Evidence suggests there is a link between low income and homelessness and we note the need for consideration of what makes suitable accommodation to include an assessment of affordability. Our proposals around core reform, strengthened prevention will help to mitigate impacts, however our proposals are dependent on wider policy measures to succeed, particularly reform to the benefits system, including an uplift in the LHA. Our proposals will also be supported by the separate work underway by the Welsh Government on housing adequacy and affordability.

Prison Leavers

Reasons for your decision (including evidence)

2.103. In Crisis' Nations Apart report 57% of homeless people in Wales surveyed had served a prison sentence.[117] Looking at the UK, 43% of homeless men surveyed had served a prison sentence, whilst 28% of homeless women surveyed had served a prison sentence. 30% of Black, Asian and Minority Ethnic people surveyed had served a prison sentence, compared with 46% for White British and 9% for White Other.[118] More than a quarter of respondents had committed a crime in order to get accommodation.[119]

2.104. In 2021 the Ministry of Justice reported that 15% of people in prison in England and Wales had been homeless before entering custody.[120] The Ministry of Justice also indicates that prison leavers are 50% more likely to re-offend if released into homelessness.[121] Between April 2020 – March 2021, more than half of prison leavers were released without settled accommodation and 3,194 people across England and Wales were released into homelessness.[122]

2.105. White people made up 72% of the prison population, Black people made up 13% and Asian, Mixed or Other Minority Ethnic groups represented 15% of all

---

[116] Page 78 the-homelessness-monitor-great-britain-2022_full-report_final.pdf (crisis.org.uk)
[117] Crisis, Nations Apart? Experiences of single homeless people across GB, 2014
[118] Crisis, Nations Apart? Experiences of single homeless people across GB, 2014
[119] Crisis, Nations Apart? Experiences of single homeless people across GB, 2014
[120] Nacro, Is the Government's rough sleeping target on track? The criminal justice perspective, 2023
[121] £70 million to keep prison leavers off the streets and cut crime - GOV.UK (www.gov.uk)
[122] Thousands of prisoners released homeless during pandemic, data shows (swlondoner.co.uk)

prisoners in England and Wales as of 31 March 2022.[123] According to the 2021 Census 82% of the population in England and Wales are White. People from Asian ethnic groups make up the second largest percentage of the population (9.3%), followed by Black (4%), Mixed (2.9%) and other (2.1%) ethnic groups Therefore, this seems to suggest that these groups are over-represented in the prison population.

How will you mitigate Impacts?

2.106. Lack of join up between services and poor communication can cause people to be left without the support that they need to find and/or retain housing as they enter and leave the prison system. Improved partnership working between housing and wider public services can help to mitigate this.

2.107. Due to long waiting times and cases being picked up at crisis point where it is sometimes too late for services to find accommodation, there is a risk of prison leavers going on to reoffend in order to get accommodation. This can result in repeated presentations to homelessness services, putting pressure on their resources and creating an unstable, low standard of living for the prison leaver. This can be addressed by allowing staff to intervene at an earlier point in the criminal justice process to allow time for prevention work to take place.

2.108. As people from Black, Asian and Minority Ethnic groups are over-represented in the prison population this could mean they may be impacted more by the links with homelessness and experience of the prison system. This could also indicate that homelessness services for prison leavers from this particular group may not be as accessible. Working towards a more person-centred approach may help to mitigate this somewhat.

2.109. The White Paper provides a series of comprehensive proposals around homelessness and the Criminal Justice System which will seek to bring positive impacts for this group, particularly at reception stage.

---

[123] HMPPS Offender Equalities Report 2021/22 (publishing.service.gov.uk)

Ex-armed forces personnel/veterans

Reasons for your decision (including evidence)

2.110. The Census 2021 suggests there are around 115,000 veterans in Wales which is 4.5% of the population.

2.111. Data suggests the numbers of-ex armed forces personnel coming through the homelessness system is low. Of the 2,631 households who were owed a duty in 2018-19 (the last full year for which we have data) between 6 and 9 were ex-armed service personnel.[124] However, engagement undertaken by Crisis and the Welsh Government to develop the White paper suggests ex-service personnel encounter a number of barriers related to homelessness to be considered as part of the aims of the White Paper.

2.112. The National Housing Pathway for Ex-Service Personnel provides a strong framework for multi-agency working, but our engagement work suggests there is more to do in embedding this practice across Wales. A strong package of support for the armed forces, their families and veterans in Wales is already in place and this will be complemented by delivery of the broader aims of these proposed reforms; to ensure a needs led, person centred and trauma- informed response to those experiencing or at risk of homelessness

How will you mitigate Impacts?

2.113. We have engaged with stakeholders representing ex-armed service personnel and the White Paper makes proposals to review the existing pathway for this group. Our broad proposals for a trauma informed service and changes to local connection will benefit this group, as will our commitment to review the current pathway.

Human Rights and UN Conventions[125]

2.114. The European Convention on Human Rights ("the ECHR") protects basic human rights and freedoms as set out in its 14 articles. It protects the right to liberty and security (Article 5) and the right to a fair trial, including in the determination of civil rights and obligations (Article 6), and prohibits discrimination (Article 14). The ECHR is incorporated into UK law by the Human Rights Act 1998.

---

[124] Households found to be eligible for assistance, unintentionally homeless and in priority need during the year: Categories of priority need by type of household (section 75) (gov.wales)
[125] Universal Declaration of Human Rights | United Nations

2.115. The Welsh Ministers cannot act in a way that is incompatible with any of the Convention rights by virtue of section 81 of the Government of Wales Act 2006.

2.116. Our initial assessment is that the proposals are compatible with Convention rights and do not have a negative impact on people's human rights.

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative Impacts?
Article 2 **Right to Life**	The proposed reforms aim to facilitate a transition toward rapid rehousing, implementing a more preventative approach to homelessness. Preventing homelessness from the earliest possible point will help to mitigate the impacts that homelessness has on general and physical health. Wider public service duties can also address issues related to death among the homeless population such as poor general and mental health and substance misuse.	Homelessness can be linked to deaths at an early age according to data reported by the Office of National Statistics (ONS). According to these figures, an estimated 741 deaths of homeless people were registered in England and Wales in 2021 and the highest number of estimated deaths were seen in men aged 45 to 49 years and women aged 40 to 44 years. Additionally, around 259 registered deaths of homeless people were related to drugs, accounting for 35.0% of all estimated deaths. Alcohol-specific	Proposed reforms aim to help those with the most complex needs find suitable accommodation through a multi-disciplinary approach. By working towards addressing issues around homelessness such as health, the Welsh Government aims to improve stability, safety and life itself for those who are homeless or at risk of homelessness as these measures would reduce early death and extend life span.

		causes accounted for 9.6% (71 deaths) and suicide accounted for 13.4% (99 deaths) of estimated deaths. Overall, these three causes were found to account for around 57.9% of homeless deaths registered in 2021, which was consistent with previous years. This demonstrates a link between poor mental health, substance abuse and homeless deaths.[126]	
Article 8 **The right to respect for private and family life and correspondence**	The Welsh Government aims to ensure that people can access and retain accommodation that suits their needs in order to achieve a better quality of life and improved personal and/or family safety, privacy and security. We have long recognised that	A lack of adequate living conditions can interfere with an individual's right to a private and family life. Housing is critical to many other aspects of an individual's private and family life, including physical and mental health, quality of life, access to	The Welsh Government will monitor the impacts of the proposals through consultation and implementation stages for potential issues or emerging risks in case any revisions are necessary. This work will take place alongside

[126] Deaths of homeless people in England and Wales - Office for National Statistics (ons.gov.uk)

	homelessness cannot be prevented through housing alone and that all public services and the third sector have a role to play in ending it. By widening responsibility for preventing homelessness, we create an opportunity to prevent the wider disadvantage, trauma and disruption that homelessness can cause. In so doing, we have an opportunity to improve individual wellbeing and life chances, lower health risks and increase life expectancy.	education and economic outcomes. Therefore, safe, stable, and affordable housing is a necessity to achieving many other human rights, including security and safety.[127]	parallel policy work related to housing adequacy and affordability.
Article 14 **Prohibition of Discrimination in respect of**	The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on	Individuals with protected characteristics have been found to experience additional	The proposed reforms will consider how housing services can adapt a more person-centred

---

[127] Naming Housing as a Human Right Is a First Step to Solving the Housing Crisis | Housing Matters (urban.org)

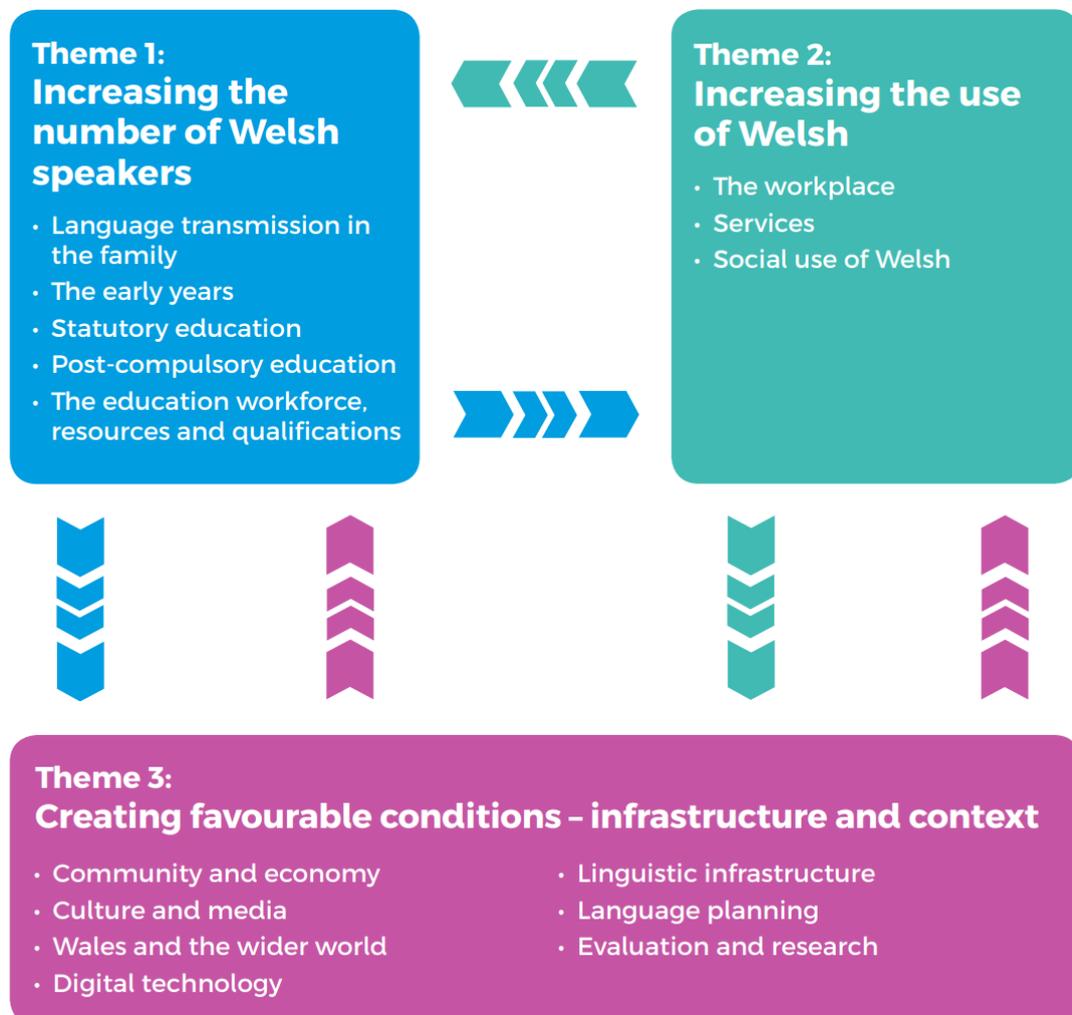| these rights and freedoms	any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.	challenges associated with homelessness. Tai Pawb identified these as including difficulty experienced in having their situation resolved or understood, barriers to self-advocating, lack of information needed to help their situation be better understood or managed and reliance on external agencies for support in resolving their issues.[128]	approach to provision of support. The proposals consider adding further nuance to the local connection test to ensure that this does not disadvantage protected groups and that different types of support networks and local links are considered. We aim to make the entire system more accessible.

---

[128] Experiences-of-homelessness-Final-Version-PDF.pdf (taipawb.org)

Cymraeg 2050 is our national strategy for increasing the number of Welsh speakers to a million by 2050.

The Welsh Government is fully committed to the new strategy, with the target of a million speakers included in its Programme for Government. A thriving Welsh language is also included in one of the 7 well-being goals in the Well-being of Future Generations (Wales) Act 2015*.*

We also have a statutory obligation to fully consider the effects of our work on the Welsh Language. This means that any Welsh Government policy should consider how our policies affect the language and those who speak it. The Cymraeg 2050 strategy has three interrelated themes:

Theme 1:
Increasing the number of Welsh speakers
- Language transmission in the family
- The early years
- Statutory education
- Post-compulsory education
- The education workforce, resources and qualifications

Theme 2:
Increasing the use of Welsh
- The workplace
- Services
- Social use of Welsh

Theme 3:
Creating favourable conditions – infrastructure and context
- Community and economy
- Culture and media
- Wales and the wider world
- Digital technology
- Linguistic infrastructure
- Language planning
- Evaluation and research

The headings under each theme outline the scope of activities that can affect the language.

As a general rule, if your policy has the potential to impact on people, it will impact in some way on Welsh speakers and therefore on the Welsh language.

1. **Welsh Language Impact Assessment reference number: 04/09/2023**

2. **Does the proposal demonstrate a clear link with the Welsh Government's strategy for the Welsh language? – Cymraeg 2050 A million Welsh speakers and the related Work Programme for 2021-2026? Cymraeg 2050 work programme 2021-2026**

   2.1. The Welsh Government's strategy for the Welsh language Cymraeg 2050 A million Welsh speakers outlines the importance of sustaining and growing communities with high numbers of Welsh speakers. [129] There are links to the proposal in this sense as the movement of people both into and from these communities can have an impact on the number of Welsh speakers.

   2.2. Additionally, Section 4 of the Well-being of Future Generations (Wales) Act 2015.[130] highlights the creation of a vibrant culture and thriving Welsh language as one of seven well-being goals. As this involves the ability for people to participate in culturally enriching activities, factors such as the placement of Welsh speakers in proximity to facilities such as Welsh language schools may be something to consider.

   2.3. Also, the strategy includes the vision of normalising the Welsh language in as many aspects of life as possible. This includes offering Welsh and English service provision and providing bilingual guidance and training for all service staff.

---

[129] Cymraeg 2050: A million Welsh speakers (gov.wales)
[130] WFG Act Statutory Guidance (gov.wales)

3. **Describe and explain the impact of the proposal on the Welsh language and explain how you will address these impacts in order to improve outcomes for the Welsh language. How will the proposal affect Welsh speakers of all ages (both positive and/or adverse effects)? You should note your responses to the following in your answer to this question, along with any other relevant information:**

3.1. The highest estimated numbers of Welsh speakers are in Cardiff (96,800), Gwynedd (91,800) and Carmarthenshire (87,500) according to Welsh language data from the Annual Population Survey (April 2022 – March 2023).[131] It is important to ensure that proposals put forward by the Welsh Government do not alienate these Welsh speaking communities. For those who use Welsh as their first language, information on how they can access support and communication with housing and homelessness staff should be available in Welsh as well as English. Also, the Welsh Government's strategy for the Welsh language aims to promote and facilitate provision of bilingual services in order to increase the range of services offered to Welsh speakers, and to see an increase in use of Welsh-language services. All materials with be available in Welsh and English, and all guidance and training materials for housing and homelessness staff will be bilingual. All materials will be accessible.

3.2. The proposal to provide more flexibility around local connection could potentially have a negative impact on the protection of the Welsh speaking communities. In some cases, people may need to be moved to a different local authority area for their own safety and wellbeing e.g. people fleeing from domestic abuse etc. Movement of Welsh speakers out of their local authority area could have an impact on the frequency at which they use the language, which would be detrimental to their long-term retention and have a negative effect on the continuation of the use of Welsh in future generations. However, all public services across Wales are available bilingually, therefore movement of Welsh speakers out of their local authority area should not restrict their ability to have access to Welsh language provision and services such as health care and education.

3.3. Additionally, local authorities should promote the Welsh language to support Welsh-speakers and non-Welsh speakers to integrate into communities across Wales. As part of Cymraeg 2050, to increase the number of speakers, early education provision (including Mudiad Meithrin, Flying Start, Seren a Sparc, Education Begins at Home) will play a vital part in increasing opportunities for

---

[131] Welsh language data from the Annual Population Survey: April 2022 to March 2023 | GOV.WALES

Welsh speakers and non-Welsh speakers to have access to use and hear the Welsh language.

3.4. The Welsh language strategy mentions retaining young Welsh speakers in Welsh speaking communities as a goal as this promotes the continuation of the Welsh language into future generations. Movement of young people out of Welsh speaking areas in order to attend university or have better access to infrastructure such as transport links is highlighted as a potential threat to this goal. However, homelessness could also present a risk as the young person may be moved to a different local authority area as a result of threats to wellbeing, a lack of suitable/affordable housing or to be in closer proximity to support systems. To address this risk, local authority teams will be able to share information regarding Welsh medium education and services available in their area/community.

3.5. The introduction of non-Welsh speakers into Welsh-speaking communities, could potentially dilute the use of the Welsh language in those areas. However, under the Welsh language strategy section on integration, the movement of non-Welsh speakers into Wales is viewed as an opportunity. [132] As part of the Welsh Language Communities Housing Plan, a Cultural Ambassadors Course will be available to all communities. The aim of this course is to support Welsh-speaking communities to welcome and help non-Welsh speakers moving into the community to integrate and feel part of the community and thus support the Cymraeg 2050 aim of reaching a million Welsh speakers.

3.6. *'A society that promotes and protects culture, heritage and the Welsh language and which encourages people to participate in the arts and sports and recreation'* is outlined as a goal in the Well-being of Future Generations (Wales) Act 2015.[133] There are a range of activities and programmes that promote Welsh culture, heritage and language that are free to access or offer free access for low income or disadvantaged families. This includes the Urdd Eisteddfod, the National Eisteddfod, Amgueddfa Cymru, Local Authority libraries, museums and archives and Welsh Government funded programmes such as the Fusion programme. [134]

3.7. In addition, there are a number of events during the year such as Open Doors that offers free access to CADW historic buildings, castles etc. across Wales. In many cases, individuals who are homeless or at risk of becoming homeless may not

---

[132] Cymraeg 2050: A million Welsh speakers (gov.wales) page 68
[133] Well-being of Future Generations (Wales) Act 2015: the essentials [HTML] | GOV.WALES
[134] Fusion programme (culture improving lives) | GOV.WALES

be able to participate in cultural activities as a result of poor mental and/or physical health relating to their housing circumstance and having to prioritise housing need over other aspects of life. The aim of the proposed reforms to ensure that homelessness is rare, brief and unrepeated will have a positive impact in this regard as it means that more people will have stable home environments that are conductive to participating in personal and cultural development activities.

3.8. Is it important that Welsh speaking staff, especially within health care settings such as the mental health and housing services that support is offered. We are aware of the importance of offering Welsh language services as CAB has highlighted in their recent research that services through the medium of Welsh is not just about a preference. We also know that many Welsh speakers feel more comfortable expressing themselves in Welsh, feel more confident communicating their needs in Welsh, think and live their lives in Welsh. It can be argued therefore that when services are not available in Welsh; this is a failure to meet a basic requirement. This is especially the case in some service contexts or where consumers are vulnerable. Feeling able to express yourself and being comfortable and confident in communicating with a service provider is vital.[135]

3.9. We will ensure that Welsh language provision is available, that bilingual guidance and learning is provided for housing service staff and that the topic of perceived impacts of proposals on the Welsh language is raised during the consultation process.

3.10. The Homelessness Prevention Legislation Team will maintain communication with colleagues in Welsh Language Division in order to anticipate and mitigate issues that pose a risk to the goals set out in Welsh language strategy or may be detrimental to the protection of Welsh speaking communities.

---

[135] English by default – Understanding the use and non-use of Welsh language services - Citizens Advice