

## **HSRAWB 04 Voices from Care Cymru**

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Senedd Cymru | Welsh Parliament

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

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

Ymateb gan: Voices from Care Cymru | Evidence from: Voices from Care Cymru

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Voices From Care Cymru

June 6th 2025

Voices From Care Cymru welcomes steps taken through legislation to improve homelessness prevention for care leavers in Wales.

Based on our engagement with young people in Wales, we believe that scrutiny of the bill should examine the risks of gaps between policy and implementation, and the influence of power dynamics affecting the accessibility of services to care leavers. This will be essential to ensure that challenges of the current arrangements do not reproduce themselves, that the changes will lead to genuinely preventative action rather than action which reacts to a new set of requirements in much the way it has in the past.

### **Policy-implementation gap**

Our engagement with young people frequently raises the inconsistent standards across local authorities in Wales. Whilst local responsibilities are important, young people, particularly those who move between local authority areas as a result of changing placements, deserve to know that there is a standard of support they will receive even if the ways in which that is organised locally may differ.

Young people tell us that plans developed to safeguard their rights are not known to them, they are unaware of their existence or feel excluded from the processes through which they are developed. Whilst local authorities may have flexibility in how they discharge their duties, there should remain some level of consistency to ensure that support on offer is accessible and known to young people. Planning processes must ensure that young people are not excluded from the process, that they are aware of genuine choices they have in making their plan, and that they have advocacy support if they request it.

Eligibility for support designed to incentivise young people and local authorities to make good choices can end up producing perverse effects – young people who are in part time education and part time work so that they can afford to live can be excluded from support offered to those in full time, when that option is not accessible or not in that young person's interest, creating a perverse situation where a young person who may need more support to remain in education is instead eligible for less.

Obligations to safeguard personal belongings require significant strengthening – there is an immense difference between the importance of these matters to young people and the importance that local authorities place on them. To some extent this is an unavoidable difference of perspective, which is why very robust policy action at the national level is needed – the costs of failing to meet these duties must be prohibitive, otherwise the position will not change. There should be both strong national rules and consideration should be given to national arrangements for ensuring these duties are properly upheld.

### **Power dynamics**

It is incredibly important to keep in mind the power dynamics at play when a young person is interacting with public services. The intentionality test is a case in point – a system which the government acknowledges resulted in decisions being made about support for young people which do not reflect natural justice. A momentary lapse of emotional regulation by a traumatised and desperate young person who is attempting to navigate a large, powerful and confusing bureaucracy may be both unacceptable and at the same time a counterproductive rationale for ending the duty to support. Young people tell us they are subject to discrimination and stigma when accessing housing services from local authorities and housing associations. Therefore any context in which unacceptable behaviour or disengagement occurs must take into account the young person's past and recent experiences, and they should be given every opportunity to make amends and to re-engage. The problem with intentionality is that it forced into destitution and exploitation some people who should have been helped, in part as a result of the pressures of the need to manage overall demand – robust safeguards will be needed if the new tests are not to lead to the same outcome as a result of the same underlying forces at work.

Applying the new tests will need to ensure that these are standards of communication and approach which ensure the exercise is not cursory. Standards of communication with young people varies widely between local authorities in

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Wales. There needs to be an obligation on local authorities to record an actual explanation as to why the young person is not engaged and record details of the steps they have taken to establish communication. This should include explaining what access to advocacy the young person has been offered. Reports from young people we speak to indicate provision of a suitable advocate is not always in place when young people need it. Follow up support must similarly be meaningful and involve real assessment rather than provision of standardised advice. Similarly, communications challenges and difficulties in forming relationships as a result of past trauma should be taken into account - to withdraw support from a young person who is not deliberately frustrating those seeking to support them but rather is simply struggling would be an infringement of their rights and, in our view, a failure of services to reach that young person, not because they are too hard to reach but because they are too easy to ignore.

Voices From Care Cymru believes that the Welsh Government should be in a position to guarantee to young people that they will not need to present themselves as homeless when leaving care. The government expects families in Wales to ensure their children are housed, and they can be liable to sanction should they fail to fulfil their duties. The challenges of housing supply compound the difficulties of meeting housing need, therefore we believe the government should strengthen its commitment to care leavers given the timescales that will be involved in addressing Wales' housing shortages. Young people tell us they are told there is a significant risk they will be homeless on or around their 18th birthday and, sadly, this is a fact for young people living in Wales today.

### **Proactive support**

There is a need to avoid changes leading to a shift in reactivity rather than a shift to prevention.

Fixed timelines should take account the need for flexibility - care experienced young people report a great deal of stress and anxiety caused by the timelines of service changes being insensitive to their lives, such as moving into a homeless hotel on the day of your 18th birthday or being uncertain as to where you will live during or after your upcoming exams. For young people living in residential children's homes, they do not have the equivalent of the 'When I'm Ready' scheme and tell us the change in their living arrangements around this time come as a real shock. The support for these young people should begin earlier and must avoid creating any disruption to critical stages in their lives like exams.

Increasing the requirements around suitability of accommodation are welcome, however to be in line with the government's commitment to person-centred

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services, the criteria must take account of social factors and mental health factors. There might be otherwise suitable accommodation that meets the tests and yet is not somewhere a young person can realistically live because of factors like the community it is in, who lives in the accommodation, and the likely impact on that young person's mental as well as physical health. Young people report to us that even if a property might in itself be suitable, they are ill-prepared with basic items they need to live and to maintain their home, and getting support once they have accepted the property can mean a long wait. Assessments therefore must lead to the provision of timely support to enable that young person to maintain the tenancy and meet their own basic needs.

We welcome the requirements to engage people with lived experience in designing services. We believe it is important that feedback mechanisms established from the outset ensure that there is proper reporting on how people's input has been used and what has changed as a result. A failure to close this feedback loop undermines the ability of those who promote civic engagement of this kind to do their work because it undermines confidence that there is value in participation.

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