

HSHAWB 31 Comisiynydd Cyn-filwyr Cymru | Veterans Commissioner for Wales

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: Comisiynydd Cyn-filwyr | Evidence from: Veterans' Commissioner for Wales

Homelessness and Social Housing Allocation (Wales) Bill

Consultation Submission by the Veterans' Commissioner for Wales



20th June 2025



"In every town and city in this country. People who were prepared to make the ultimate sacrifice for our nation, who put their lives on the line to protect us all, but who will not have a safe place to sleep tonight. We cannot stand by and let this happen anymore. We will repay those who served us and house all veterans in housing need. Homes will be there for heroes."

Sir Keir Starmer, Prime Minister 24 Sep 2024



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Starmer vows all military veterans will get homes

Prime Minister Sir Keir Starmer has promised to give all military veterans, young care leavers and victims of domestic abuse a "guaranteed roof over their head".

All three groups will be exempt from local connection tests, which most councils use to decide who can qualify for social housing.

Currently armed forces veterans are only exempt from the rules for five years

<https://www.bbc.co.uk/news/articles/cz6wdg9x0qdo>

Key Concern – Absence of Local Connection Exemption for Veterans

Having read the proposed Bill and Explanatory Memorandum and having met with Jane Bryant MS and her officials, the Commissioner has concerns that the Bill does not provide exemption from the local connection test for military veterans and their families in Wales.

Argument

By not providing veterans local connection exemption, the Welsh Government are at risk of not following the promise made by the Prime Minister to all veterans across the UK to make them exempt for local connection tests with regards to housing (see BBC reporting above and quote on front page of this submission).

The failure to provide local connection exemption for homeless Veterans in Wales places them at a clear disadvantage to veterans in England and goes against the spirit of the Armed Forces Covenant. It potentially penalises them for the mobile nature of their service, which makes it difficult for them to demonstrate a local connection to a local authority or housing provider.

‘Local connection’ is one of the areas the [Covenant Legal Duty](#) covers and on 16 June 2025, following the Defence Committee’s report on the Armed Forces Covenant, the UK Government has committed to extending the Covenant’s Legal Duty to all UK Government departments and the devolved administrations.

Background

The Armed Forces Covenant

<https://assets.publishing.service.gov.uk/media/5a8152b0e5274a2e87dbcff3/20161215-The-Armed-Forces-Covenant.pdf>

“Those who serve in the Armed Forces, whether regular or Reserve, **those who have served in the past, and their families, should face no disadvantage compared to other citizens in the provision of public and commercial services.** Special consideration is appropriate in some cases, especially for those who have given most such as the injured and the bereaved. This obligation involves the whole of society: it includes voluntary and charitable bodies, private organisations, and the

actions of individuals in supporting the Armed Forces. Recognising those who have performed military duty unites the country and demonstrates the value of their contribution. This has no greater expression than in upholding this Covenant.”

Covenant Legal Duty

The Covenant Legal Duty is a legal obligation on certain public bodies to have due regard to the [Covenant principles](#) when carrying out certain functions in healthcare, education, and **housing**.

The public bodies subject to this Legal Duty include local authorities, governing bodies of certain state-funded schools, and various NHS bodies.

On 16 June 2025, following the Defence Committee’s report on the Armed Forces Covenant, the Government has committed to **extending the Covenant’s Legal Duty to all UK Government departments and the devolved administrations**.

(<https://publications.parliament.uk/pa/cm5901/cmselect/cmdfence/1034/report.html>)

‘Local connection’ is one of the areas the [Covenant Legal Duty](#) covers. To find out more, see section 4C2 of the Legal Duty [statutory guidance](#).



Local Connection Regulations Across the UK

[Regulations](#), first introduced in 2012, set out criteria under which members of the Armed Forces community in England cannot be disqualified from social housing because of a local connection requirement. The June 2020 [statutory guidance](#) for local authorities in England makes clear that local authorities in England are expected to disapply any local connection requirement from divorced or separated spouses or civil partners of Service personnel who are required to move out of accommodation provided by the Ministry of Defence.

Exemptions to local connection criteria also exist in Wales, provided that the applicant can evidence that they were posted to an area in Wales during their

time in the Armed Forces. These exemptions are explained in the Welsh Government's [guidance](#).

In response to the Scottish Veterans' Commissioner's recommendations, the Scottish Government published a [Practice Guide](#) for social landlords on allocations for people leaving the Armed Forces. It includes guidance on giving priority to Service leavers and on ensuring that veterans are not at a disadvantage when applying for social housing due to Service time spent outside an area. Following consultation, the Scottish Government published a [ministerial statement](#), in March 2021, which sets out the circumstances and general criteria which would act as the reference for exercising the power to modify local connection.

'Local connection' is one of the areas the [Covenant Legal Duty](#) covers. To find out more, see section 4C2 of the Legal Duty [statutory guidance](#).

Current WG guidance to Local Authorities

(Guidance for Local Authorities on the Allocation of Accommodation and Homelessness March 2016)

Ex-service personnel

18.11 For the purposes of the 2014 Act, serving members of the Armed Forces, and

other persons who normally live with them as part of their household, do establish a

local connection with an area by virtue of serving, or having served, there while in

the Forces.

18.12 This should also present an opportunity to consider if the individual(s) have

care and support needs and if authorities should fulfil their duties afforded by the

Social Services and Wellbeing (Wales) Act 2014.

<https://www.gov.wales/sites/default/files/publications/2019-03/allocation-of-accommodation-and-homelessness-guidance-for-local-authorities.pdf>

About the Veterans' Commissioner for Wales

The Commissioner is a Public Appointee and works with UK, Welsh and local government to ensure that due regard is given to the application of the Armed Forces Covenant across Wales with regards to veterans and their families.

The key responsibilities of the Commissioner role are:

- leading engagement with the veterans' community in Wales
- working with relevant stakeholders, interest groups and individuals to understand how support for veterans is working in practice
- reporting to the Secretary of State for Wales, and the Minister for Veterans, on how UK government support for veterans can be improved
- reporting on how Welsh Government support is functioning, and whether the UK government can assist in improving any of those functions
- developing relationships with the likes of the Welsh Government, the Welsh Parliament, UK government departments with Welsh representation, charities, regimental associations and others to become the key voice for veterans in Wales

20th June 2025

Col (Retd) James Phillips

Veterans' Commissioner for Wales
