

HSHAWB 29 Llamau

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 Llamau | Evidence from Llamau

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

(We would be grateful if you could keep your answer to around 500 words).

Llamau strongly welcomes the general principles of the Bill and believes the only way to deliver the stated policy intentions is through legislation. There are some areas we would like to see strengthened which we will detail later in the response, but we believe this is an opportunity to deliver a psychologically and trauma informed approach to the prevention and alleviation of homelessness in Wales which cannot be missed.

We believe it is important to recognise and respect the voices of 300 people with lived experience who contributed to the development of this bill, balanced with the views of other interested and affected groups, such as the Expert Review Panel and the Local Authority Reference Group who were involved. We welcome the spirit of collaboration, and a real desire to make a positive difference to limiting the traumas experienced by those living through homelessness / the risk of homelessness, which then impact the society we all live in. However, we are concerned that the Bill does not go far enough in addressing the specific and acute needs of young people, LGBTQ+ young people, and women experiencing domestic violence and at risk of homelessness.

We strongly support the aims of the Bill which are set out in the Explanatory Memorandum, which states:

- Expand access to homelessness services and provide additional support to those who need it most.

- Widen responsibility to certain specified public authorities to identify individuals who are homeless or at risk of homelessness and respond effectively.
- Prioritise allocation of social housing to those most in need.

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

(We would be grateful if you could keep your answer to around 500 words).

We are particularly encouraged by the provisions set out in Part 1 (Sections 1-34), which represent a significant step forward in creating a more inclusive, preventative, and rights-based approach to homelessness.

There are a number of things within the Bill which should limit pressures at the crisis point, including increasing the period during which Early Help / Prevention should be provided, and the requirement for there to be PSAPs –which will hopefully support a more consistent approach, and support, including regular updates for the person attending.

There is more flexibility for the range of housing options for which homelessness duty can be discharged (IF they are likely to last at least 12 months), we welcome the requirement for a check in during that time to ensure this.

We are glad to see Priority Need and Intentionality abolished.

We welcome an expanded definition of Domestic Abuse when applying the exemption from referral to another housing authority, this will further support victims / survivors to remain and make a home in the safest and most appropriate place for them, recognising levels of risk, and availability of crucial support networks for their recovery.

While we recognise the challenges and the need to protect others, we have some concerns about the ability to end homelessness duty due to:

-violent & threatening behaviour

-Intentionally destroying / seriously damaging property (without reasonable excuse).

These behaviours are often a result of traumas experienced, which have often been allowed to escalate to crisis point, before people are eligible for support from specialist agencies.

We welcome the following changes:

- Extends the prevention duty by redefining “threatened with homelessness” to include those at risk within six months.

- Abolishes the priority need and intentionality tests.

- Prevention, Support and Accommodation Plans (PSAPs), which offer a more person-centred and trauma-informed approach to support planning.

Places new duties on public bodies to “ask and act,”. We are disappointed this duty does not include GP’s / primary care & Education providers (at institution level).

- Strengthens support for care leavers, including a duty to ensure suitable accommodation and joint protocols between housing and social services. We would like to see scale up of proven models of young people's pathways like our Registered Home to Independence Pathway in the Vale of Glamorgan, which supports young people from age 11 through registered homes, into supported accommodation, and into independent accommodation.

There is no focus on transition pathways from childhood - Too often we see young people turning 18 but their cognitive age due to childhood trauma is often much younger. In these cases, homelessness services are too often left isolated in their bid to support these young people post 18. The looked after system, (including those young people who have become homeless but have not been in care) often hasn’t equipped these young people well enough for the future by that age, when support drops off a cliff for the young person and for us as providers. This is a crucial stage in someone’s long term chance of success and to avoid repeat homelessness. We would like to see something in the Bill which addresses the issue and calls upon all partners, particularly statutory, to work together beyond someone’s 18th birthday to reduce the likelihood of their lives unravelling at that point and the cycle of homelessness being a long-term factor for them.

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

(We would be grateful if you could keep your answer to around 500 words).

Llamau welcomes the Welsh Government's continued commitment to ending homelessness and supports the reforms proposed in Part 2 (Sections 35–38) of the Bill, which aim to improve the fairness, transparency, and effectiveness of social housing allocation in Wales.

We recognise that access to secure, affordable housing is a cornerstone of homelessness prevention. The proposed changes to social housing allocation are a vital complement to the preventative duties outlined in Part 1 of the Bill.

We are encouraged by the Bill's efforts to:

Clarify eligibility and qualification criteria, which can help reduce inconsistencies across local authorities and ensure that vulnerable individuals, including young people and care leavers, are not unfairly excluded.

Strengthen the role of local authorities in managing allocations, while ensuring that allocation schemes are aligned with the new homelessness duties.

Promote transparency and fairness, which is essential for building public trust and ensuring that social housing is allocated to those in greatest need.

These changes support a more integrated housing system that prioritises prevention and early intervention—principles that are central to Llamau's work.

While we support the direction of travel, we believe the success of these provisions will depend on:

Avoiding exclusionary practices: Qualification criteria must be designed to include, not exclude, those with complex needs or histories of homelessness. We urge the Welsh Government to provide clear guidance to ensure consistency and fairness across Wales.

Resourcing and support: Local authorities will need adequate funding, training, and technical support to revise and implement allocation schemes effectively.

Monitoring and accountability: We recommend the establishment of a national oversight mechanism to ensure that allocation practices are aligned with the Bill's intentions and do not disadvantage vulnerable groups.

Co-production with lived experience: Allocation schemes should be developed in partnership with people who have experienced homelessness to ensure they are accessible, trauma-informed, and responsive to real-world challenges.

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

(We would be grateful if you could keep your answer to around 500 words).

Llammau welcomes the legal and technical reforms set out in Part 3 (Sections 39–43 and Schedule 1) of the Homelessness and Social Housing Allocation (Wales) Bill. These provisions are essential to ensuring that the broader reforms introduced in Parts 1 and 2 are underpinned by a clear, consistent, and modernised legal framework.

We support the Bill's intention to consolidate and update existing housing legislation to reflect the new duties and definitions introduced elsewhere in the Bill. The amendments outlined in Schedule 1 are particularly important in ensuring that the legal infrastructure governing homelessness and social housing allocation is coherent and aligned with the Welsh Government's preventative and rights-based approach.

By modernising outdated provisions and ensuring consistency across legal texts, Part 3 helps to reduce ambiguity and improve the ability of local authorities and housing providers to implement the new duties effectively. This legal clarity is vital for frontline practitioners, especially those working with vulnerable groups such as young people and care leavers.

While the provisions in Part 3 are largely technical, their successful implementation will require:

Clear and accessible guidance: Local authorities and housing providers must be supported with practical guidance and training to interpret and apply the revised legal frameworks consistently.

Effective communication: Changes to legal duties and allocation rules must be clearly communicated to professionals and the public to avoid confusion and ensure that individuals understand their rights and entitlements.

Monitoring and review: As these provisions form the legal foundation for the Bill's broader reforms, it is essential that their impact is monitored and reviewed regularly to ensure they are delivering the intended outcomes.

The provisions in Part 3 are workable and necessary to support the Bill's overarching policy intention: to end homelessness in Wales through a preventative, person-centred, and legally enforceable framework. These legal reforms provide the scaffolding needed to embed the new duties into practice and ensure that they are applied consistently across Wales.

However, legal reform alone is not sufficient. The success of these provisions will depend on how they are operationalised on the ground. This includes ensuring that local authorities have the capacity, resources, and support to implement the changes effectively and equitably.

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

(We would be grateful if you could keep your answer to around 500 words).

1. Resource Constraints

One of the most significant barriers is the capacity of local authorities and partner organisations to deliver the expanded duties, particularly the extended prevention responsibilities, the abolition of priority need, and the introduction of Prevention, Support and Accommodation Plans (PSAPs). These reforms require increased staffing, training, and access to suitable housing.

The Bill acknowledges the need for a whole-system approach and outlines duties for public bodies to collaborate. However, it does not include specific funding commitments. Llamau recommends that implementation be supported by a comprehensive resourcing strategy, including ring-fenced funding and workforce development plans.

2. Housing Supply Shortages

The success of the Bill depends on the availability of appropriate, affordable housing. Without sufficient housing stock—particularly for young people, care leavers, and those with complex needs—local authorities may struggle to meet their duties, even with the best intentions.

The Bill aligns with the Welsh Government’s broader housing strategy, including commitments to increase social housing supply. However, the legislation itself does not directly address housing development. Llamau urges close coordination between this Bill and housing investment plans.

3. Cultural and Practice Change

The Bill introduces a shift toward a rights-based, preventative model. This requires a cultural change across housing, social care, health, and other public services. Embedding trauma-informed, person-centred approaches will take time and sustained effort.

The introduction of PSAPs and the “ask and act” duties on public bodies are positive steps. However, successful implementation will require robust training, leadership, and accountability mechanisms. Llamau recommends a national implementation framework to support consistent practice change.

4. Legal and Administrative Complexity

The Bill introduces new legal duties and modifies existing frameworks. While this modernisation is welcome, it may create confusion or inconsistency during the transition period.

Part 3 of the Bill provides legal clarity and updates existing legislation to align with the new framework. To support implementation, Llamau recommends the publication of clear statutory guidance and accessible resources not just for professionals but for people who are homeless or threatened with homelessness.

5. Monitoring and Accountability

Effective implementation requires mechanisms to track progress, identify gaps, and ensure accountability.

The Bill includes provisions for review and appeals, but further detail is needed on how outcomes will be monitored at a national level.

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

(We would be grateful if you could keep your answer to around 500 words).

The powers outlined in Chapter 5 of Part 1 of the Explanatory Memorandum are generally proportionate and necessary to support the Bill's aims. They allow for flexibility in implementation, which is essential given the dynamic nature of housing markets, the diversity of local authority contexts, and the evolving understanding of best practice in homelessness prevention and support.

For example, the ability to issue statutory guidance on the development and implementation of Prevention, Support and Accommodation Plans (PSAPs) is crucial. These plans must be person-centred and trauma-informed, and guidance will help ensure consistency across Wales while allowing for local adaptation. Similarly, powers to amend the list of public bodies subject to the "ask and act" duty are important, particularly as evidence emerges about the effectiveness of different agencies in identifying and responding to homelessness risk.

However, while these powers are appropriate in principle, their use must be accompanied by robust safeguards to ensure transparency, accountability, and meaningful engagement with stakeholders, including people with lived experience of homelessness. Subordinate legislation should be subject to appropriate scrutiny by the Senedd, and there should be clear processes for consultation before significant changes are made.

Llamau is particularly concerned that some key services—such as education providers (particularly at school level) and primary care (GPs)—are not currently included in the "ask and act" duty. The power to expand this list is welcome, but we urge the Welsh Government to use it proactively and in consultation with the sector. These services play a critical role in early identification and intervention, especially for young people at risk of homelessness due to family breakdown, school exclusion, or mental health issues.

We also recommend that any guidance issued under the Bill be co-produced with frontline practitioners and individuals with lived experience. This will help ensure that the guidance is practical, trauma-informed, and responsive to the realities of service delivery.

In conclusion, the powers granted to Welsh Ministers to make subordinate legislation are broadly appropriate and necessary to support the Bill's

implementation. However, their use must be guided by principles of transparency, co-production, and accountability. Llamau urges the Welsh Government to commit to inclusive consultation processes and to ensure that all subordinate legislation and guidance reflect the Bill's preventative, rights-based, and person-centred ethos.

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

(We would be grateful if you could keep your answer to around 500 words).

1. **Increased demand without supply:** The removal of the priority need and intentionality tests is a welcome step toward equity. However, it may lead to a surge in demand for housing and support services. Without a corresponding increase in affordable housing—particularly one-bedroom and supported accommodation—young people may still face long waits or be placed in unsuitable temporary accommodation.
 2. **Overstretching of local authority services:** The Bill places significant new duties on local authorities, including extended prevention responsibilities and the introduction of Prevention, Support and Accommodation Plans (PSAPs). These are positive reforms, but without additional staffing, training, and funding, there is a risk that services will be unable to deliver them effectively.
 3. **Dependency on Temporary Accommodation:** The Bill delays reform of temporary accommodation until 2030. In the meantime, local authorities may continue to rely on unsuitable or unsafe temporary housing, including B&Bs, for young people.
 4. **Inconsistent multi-agency engagement:** While the Bill introduces “ask and act” duties for some public bodies, key services such as education and primary care are not explicitly included. This could lead to missed opportunities for early intervention, especially for young people at risk of homelessness due to family breakdown, school exclusion, or mental health issues.
 5. **Legal and bureaucratic complexity:** The introduction of new legal duties and the restructuring of existing frameworks may create confusion during the transition period. Young people and frontline workers may struggle to understand their rights and responsibilities.
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6. Refugee and UASC risk: The six-month prevention window may not align with the shorter notice periods given to refugees leaving Home Office accommodation. This mismatch could disproportionately affect young refugees and asylum seekers.

Llamau recommends:

Immediate investment in youth-specific housing and support services.

Inclusion of education and health in statutory “ask and act” duties.

Clear, accessible guidance for young people and practitioners.

A national oversight body to monitor implementation and outcomes.

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

(We would be grateful if you could keep your answer to around 500 words).

From Llamau’s perspective as a frontline organisation supporting young people and women who are homeless or at risk of homelessness, we believe the financial assessment in Part 2 of the Explanatory Memorandum may underestimate the scale of investment required to deliver the Bill’s transformative aims effectively and equitably.

We acknowledge that the Welsh Government has committed to a phased approach to implementation and has recognised the need for additional resources to support local authorities and public bodies. The financial memorandum outlines anticipated costs related to:

Workforce development and training

IT and administrative systems

Development of Prevention, Support and Accommodation Plans (PSAPs)

Strengthening multi-agency collaboration

These are all essential areas of investment, and we welcome the recognition that a whole-system response is needed to make homelessness rare, brief, and unrepeated.

Despite these positive elements, Llamau has several concerns about the adequacy and realism of the financial planning:

Underestimation of Demand: The removal of priority need and intentionality tests is likely to increase the number of people eligible for support. Without a corresponding increase in funding, local authorities may struggle to meet demand, leading to delays, inconsistent service delivery, or reliance on unsuitable temporary accommodation.

Housing Supply Investment: The financial memorandum does not sufficiently address the need for increased investment in affordable and supported housing. The success of the Bill depends on the availability of appropriate housing options, particularly for young people and those with complex needs.

Sustainability of Funding: While the memorandum references initial implementation costs, it is less clear on how ongoing funding will be sustained. Preventative approaches require long-term investment to be effective, and short-term or one-off funding may not be sufficient to embed the cultural and structural changes the Bill demands.

Third Sector Capacity: The financial assessment focuses primarily on statutory services. However, third sector organisations like Llamau play a critical role in delivering homelessness prevention and support. We are concerned that the financial implications for voluntary sector partners have not been fully considered or costed.

Monitoring and Oversight: Effective implementation will require robust monitoring, data collection, and independent oversight. These functions must be properly resourced to ensure transparency and accountability.

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

(We would be grateful if you could keep your answer to around 500 words).

Children and Young People;Communities ;Education ;Equality and Human Rights;Finance;Health and Care Services;Housing;Social Care
