

Homelessness and Social Housing Allocation (Wales) Bill

Stage 1 Report

October 2025



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Local Government and Housing Committee
Welsh Parliament
Cardiff Bay
CF99 1SN

Tel: **0300 200 6565**
Email: **SeneddHousing@senedd.wales**
X: **[@SeneddLGHousing](https://twitter.com/SeneddLGHousing)**

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About the Committee

The Committee was established on 23 June 2021. Its remit can be found at:
www.senedd.wales/SeneddHousing

Current Committee membership:



**Committee Chair:
John Griffiths MS**
Welsh Labour



Peter Fox MS
Welsh Conservatives



Lesley Griffiths MS
Welsh Labour



Siân Gwenllïan MS
Plaid Cymru

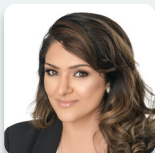


Joel James MS
Welsh Conservatives



Lee Waters MS
Welsh Labour

The following Member attended as a substitute during the scrutiny of the Bill.



Natasha Asghar MS
Welsh Conservative

The following Member was also a member of the Committee during the scrutiny of the Bill.



Laura Anne Jones MS
Reform UK

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2015, including the timescale for such secondary legislation. Changes prohibiting accommodation which is unfit for human habitation should be made as soon as possible, regardless of any further changes made which we understand are planned based on the temporary accommodation reviews required by the Bill.

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Recommendation 18. We recommend that the Welsh Government publishes tightly defined referrals guidance that specifies the circumstances in which RSLs may refuse a referral, and also stipulates effective information-sharing about any support needs the applicant may have..... Page 100

Recommendation 19. The Welsh Government should establish a national common standard for data on social housing waiting lists and allocations, publishing robust data at local and national level..... Page 105

Recommendation 20. The Welsh Government should make its case for including the provision to create qualifying persons criteria in the Bill, and unless it can do so, the provision should be removed. Page 106

Recommendation 21. As the Code of Guidance will need to be updated to reflect the changes being made by this legislation, the Welsh Government should revise the Guidance to specify that a local authority may write to an applicant, noting that they are minded to find them to be deliberately manipulating the housing system, in the same way as the Code of Guidance provides such powers in the context of intentionality..... Page 110

Recommendation 22. The Welsh Government should address concerns about possible unintended consequences arising as a result of new section 167A(2)(b)(ii) of the Housing Act 1996. Evidence provided by legal professionals highlighted how the deliberate manipulation test could negatively impact people who may not intend to manipulate the housing system, but may be considered to have done so given the way the Bill is drafted. Page 110

Conclusion 1. In our legacy report at the end of this Senedd term, we will recommend to our successor committee that it seeks regular updates from the next government on the timing of implementing the provisions. Page 29

Conclusion 2. The Welsh Government should engage further with local authorities to understand their concerns on the level of resource needed to implement provisions relating to the prevention support and accommodation plans..... Page 39

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Conclusion 4. While we support ending intentionality to move to a more trauma-informed service, we also understand the concerns of those who worry that deliberate manipulation could be used in similar ways, leading to vulnerable people being unable to access social housing. The Welsh Government should take steps via guidance and training to ensure that deliberate manipulation is implemented in a trauma-informed way..... Page 58

Conclusion 5. We support the longer period during which local connection referrals relating to prisoners can take place, however we remain concerned as to how effective this will be in reality, especially cross-border. This is an area of concern and we request further information as to how the Welsh Government will work with the UK Government to implement this. We would also welcome further information as to how this will apply to prisoners released ‘at time served’.
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Conclusion 6. We believe that, in providing regular updates to the Senedd on preparations for implementation, the Welsh Government should include details of how the post-custody accommodation working group is progressing its arrangements to meet the need for earlier local connection referrals for prisoners.
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Conclusion 7. We are concerned that ending a duty to provide homelessness support is a drastic step and believe that options for providing further support should be put in place before such action is taken as a last resort. The Welsh Government should amend the Bill to clarify that duties can only be ended for unacceptable behaviour if the local authority is satisfied that there is no other way they can deliver homelessness functions to that applicant.Page 71

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We note from the implementation timescale cited by the Cabinet Secretary that the duty is due to commence as part of the second phase in 2028-29, and while there is significant time to plan ahead, this time must be spent wisely.....Page 80

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Conclusion 11. Strong guidance on the use of the power to refer will be needed and developed by the Welsh Government in partnership with local authorities and RSLs. Page 100

Conclusion 12. The Welsh Government should consider how it intends to monitor the impact of the provisions in terms of allocations acceptances and refusals. Page 100

Conclusion 13. We believe that, once implemented, the provisions relating to co-operation between local authorities and RSLs will need to be carefully monitored to assess how they work in practice. Page 101

Conclusion 14. Clear guidance will be needed on the implementation of the power in section 35 to determine categories of people eligible for social housing. While local authorities will need flexibility to use the power to meet their local needs, significant divergence across Wales should be avoided to prevent a postcode lottery. Guidance should also be clear that equality legislation should be adhered to when deciding on qualifying criteria. RSLs should be involved in discussions and decisions on what should constitute ‘qualifying criteria’.....Page 106

Conclusion 15. The Welsh Government should keep the qualifying persons provision under review and remove it in future if it is no longer needed or causing significant unintended consequences.....Page 106

Conclusion 16. Disqualification from social housing allocation does not provide a sustainable solution to tackling unacceptable behaviour and further support should be provided prior to such action being taken. The Welsh Government should provide strong trauma-informed guidance to ensure that exclusion from social housing is only used in extreme cases.....Page 106

Conclusion 17. We welcome the Cabinet Secretary’s commitment to consider amending the Bill to allow for specified types of social housing allocation to take place outside the common housing register and request an update as part of the debate on the general principles of the Bill.....Page 116

1. Introduction

The Homelessness and Social Housing Allocation (Wales) Bill (“the Bill”) was introduced on 19 May 2025 and was remitted to the Local Government and Housing Committee for scrutiny of its general principles. Other Senedd committees have also conducted scrutiny of financial and constitutional aspects of the Bill.

1. On 19 May 2025, Jayne Bryant MS, the Cabinet Secretary for Housing and Local Government (“the Cabinet Secretary”) introduced the Bill and accompanying Explanatory Memorandum (“EM”). A Statement of Policy Intent was also published for the Bill.
2. The Senedd’s Business Committee referred the Bill to the Local Government and Housing Committee (“the Committee”) for consideration of the general principles (Stage 1), in accordance with Standing Order 26.9. The Business Committee agreed that the Committee should report by 17 October 2025.

Terms of reference

3. On 22 May 2025, we agreed the following framework within which to scrutinise the general principles of the Bill, which were to consider:
 - The general principles of the Homelessness and Social Housing Allocation (Wales) Bill and whether there is a need for legislation to deliver the Bill’s stated policy objectives, which are to:
 - 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.

- Any potential barriers to the implementation of the Bill's provisions, and whether the Bill and accompanying Explanatory Memorandum and Regulatory Impact Assessment take adequate account of them.
- Whether there are any unintended consequences arising from the Bill.
- The Welsh Government's assessment of the financial and other impacts of the Bill as set out in Part 2 of the Explanatory Memorandum.
- The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation as set out in Part 1: Chapter 5 of the Explanatory Memorandum.
- Matters relating to the competence of the Senedd including compatibility with the European Convention on Human Rights.
- The balance between the information contained on the face of the Bill and what is left to subordinate legislation.
- Any matter related to the quality of the legislation.
- Any other matter related to the constitutional or other implications of the Bill.

Our approach

4. Between 23 May and 20 June 2025, we conducted a public consultation to inform our work, based on the agreed terms of reference. 52 consultation responses were received and have been published on our website. We received a technical briefing from Welsh Government officials on 22 May.

5. We held oral evidence sessions with the Cabinet Secretary on 4 June and 18 September. We also held a series of ten oral evidence sessions with external stakeholders on 19 June and 26 June. A list of witnesses can be found at Annex A, and a list of consultation responses can be found at Annex B.

6. As part of our recent work on housing support for vulnerable people, the Senedd's Citizen Engagement Team undertook a series of focus groups and interviews with people accessing housing services and frontline workers responsible for delivering those services. Views expressed through that engagement were also relevant to our scrutiny of the Bill and are reflected through this report.

7. We are grateful to all those who took the time to provide evidence and briefing to inform our scrutiny.

Other Committees' consideration of the Bill

8. The Senedd's Finance Committee took evidence from the Cabinet Secretary on the financial implications of the Bill on 11 June 2025. The Senedd's Legislation, Justice and Constitution Committee took evidence from the Cabinet Secretary on the appropriateness of the provisions in the Bill that grant powers to make subordinate legislation on 23 June 2025. Both committees have reported on their conclusions.

2. General Principles and the need for legislation

The Bill proposes to reform existing legislation on homelessness and social housing allocations in support of the aim of ending homelessness in Wales.

9. The EM states that there have been considerable pressures on homelessness services across Wales as a result of factors such as the Coronavirus pandemic, humanitarian response to the war in Ukraine and the cost-of-living crisis. It says that the current approach to homelessness is “not sustainable” with high numbers of people presenting to local authorities, high numbers in temporary accommodation, and dropping prevention rates. The EM says that between the start of the pandemic and June 2023, over 38,600 people experiencing homelessness were supported with emergency temporary accommodation. The number of homelessness presentations has not declined since the pandemic due to wider cost-of-living and housing supply issues.

10. The Welsh Local Government Association (WLGA) set out some of the pressures on homelessness services:

“There have been significant increases in demand for services from homelessness and support services, aligned to both homelessness and temporary accommodation use reaching record levels in Wales during 2024. But councils and partners are finding there is also an increase in the complexities of need from some people seeking services and support. This can make it more difficult for councils to find suitable accommodation that can meet their specific needs. Ensuring safeguarding of an individual and wider residents are key considerations.”¹

11. The Welsh Government says that legislative reform is a necessary step “to achieve systemic transformation”, alongside broader changes in policy and practice, and investment in housing supply. They believe these measures should improve prevention, lead to more person-centred services, and make better use of accommodation supply to those most in need.

¹ HSHAWB 52, WLGA

12. The EM states that the Bill reforms existing homelessness and housing legislation in Wales by amending Part 2 of the Housing (Wales) Act 2014 (“the 2014 Act”) and Part 6 of the Housing Act 1996 (“the 1996 Act”) to enhance the prevention and relief of homelessness in Wales. It says that the Bill will:

- 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.

13. The Bill seeks to increase the number of people eligible for homelessness support and encourage earlier prevention. It does this by ending the priority need and intentionality tests, and by requiring local authorities to help prevent homelessness if an applicant is within six months of losing their home.

Background to the Bill

14. The EM states that the introduction of the Bill follows years of engagement with stakeholders, initiated by the work of the Homelessness Action Group. After the Group reported to the Welsh Government, the then Cabinet Secretary for Housing, Local Government and Planning, Julie James MS, commissioned homelessness charity Crisis to convene a further group, the Expert Review Panel. In September 2023 this group made detailed recommendations to the Welsh Government on how legislation should be reformed. In October 2023 the Welsh Government published its Ending Homelessness White Paper.

15. In introducing the Bill, the Cabinet Secretary made a statement in Plenary on 20 May, 2025 explaining that:

“Bold reform is necessary to shift the paradigm and progress towards ending homelessness in Wales. It will help create a Welsh homelessness system fit for the future, moving away from a system that responds to crisis to one that focuses on prevention—by far the most effective means of addressing homelessness risk in Wales.”²

² Plenary, 20 May 2025, Record of Proceedings (RoP) paragraph (p)139

General principles

16. The Cabinet Secretary explained to us that the “package of reforms” within the Bill will “prevent more cases of homelessness by intervening earlier and offering more ways [of moving people] through the system” and stated that:

“At the moment, we have a system that really focuses on the crisis edge, and we know that we need to move towards that preventative side of services, which we know is cost-effective, not just economically, but in terms of the human cost as well.”

17. The Cabinet Secretary added that the Bill:

“seeks to prevent homelessness as a young person transitions from care, and tackles homelessness after a period in custody as well. It places responsibility for homelessness prevention across the public sector, making it a public service response, and makes the most effective use of housing supply, relieving that pressure on temporary accommodation, use, and providing local authorities with more ways to accommodate people.”

18. The Cabinet Secretary went on to say that “doing nothing is not an option” and:

“Without reform, homelessness will increase, as will the cost to the public purse.”

19. The Cabinet Secretary acknowledged that “it may not be possible to do this all in one go”, explaining the reason for an earlier focus on the preventative measures while other provisions such as abolishing intentionality and priority need would be expected to be implemented later.³

20. Most of the stakeholders we heard from were generally positive about the overall general principles of the Bill. Professor Suzanne Fitzpatrick, who chaired the Expert Review Panel, welcomed the Bill, saying that it is “true to the balanced and coherent package that the Expert Review Panel was striving to achieve”. Professor Fitzpatrick told us that legislation is needed to deliver the reform needed:

³ Local Government and Housing Committee, 4 June 2025, RoP p4-6

“In particular, I think legislation is required to dismantle the current barriers that particularly single homeless people face in accessing rehousing help through the legislation.

I also think legislation is particularly required to reorientate practice towards more upstream forms of prevention and also to increase the flow of people out of the system into settled housing via widening the range of rehousing options that are available to local authorities to discharge duty, but also to improve access to social housing.”⁴

21. Liz Davies KC referred to the Bill as “transformative”, and told us that although some of the provisions could probably be achieved through secondary legislation, having primary legislation “sends a powerful political message”, adding that this approach “rather than trying to do it through secondary legislation is absolutely necessary”.⁵

22. Shelter Cymru told us that legislative change is needed to “see the realisation of a commitment to end homelessness or to make it rare, brief and non-recurring”, explaining that:

“having the legislation acts as a driver in of itself to deliver all the other things that are needed to make that possible. The legislation on its own can’t do this, but the legislation with commitments on when it’s going to come in, clear timelines, can drive the additional funding, resourcing, housing supply that’s going to be necessary.”⁶

23. Cymorth Cymru also told us that the Bill is “absolutely needed”, adding that:

“so many of the barriers that currently prevent people from getting the help that they need are so firmly embedded in the legislative framework, and therefore only legislative change would be able to remove those barriers and ensure that people get the help that they need.”⁷

24. The Wallich and Welsh Women’s Aid concurred, with the Wallich telling us that “new legislation is urgently needed” and that “shortcomings in the existing

⁴ Local Government and Housing Committee, 19 June 2025, RoP p6-7

⁵ Local Government and Housing Committee, 19 June 2025, RoP p157

⁶ Local Government and Housing Committee, 19 June 2025, RoP p161

⁷ Local Government and Housing Committee, 19 June 2025, RoP p261

provisions” mean that support can be denied or withdrawn, leaving some people to fall through the gaps.⁸

25. We heard from Crisis that the Bill “could make an absolutely massive difference” as the “current legislation is not working”. They referred to their ‘Homelessness Monitor’ which showed that homelessness could rise by 24 per cent by 2041 if no action is taken.⁹

26. Despite the support from some sectors, local authority representatives raised concerns with some provisions in the Bill, including some who did not support the general principles. The WLGA said that councils “are supportive of the ambition of the Bill and recognise and welcome changes made to the proposals by Welsh Government since the White Paper”, but remained concerned by the impact of the Bill “if all clauses are introduced in its current form”.¹⁰

27. There was agreement among local authority representatives that the current approach is unsustainable, with each one describing the high level of demand for support services and pressure on temporary accommodation in their area, however differing views were expressed on whether the Bill will increase or decrease demand for such services. The preventative measures in the Bill were generally welcomed, but concern was raised that other measures could put additional pressure on housing services.

28. Cardiff Council told us that they do not support the Bill as they believe the approach could exacerbate the pressure on support services and would prefer the Bill not to proceed:

“we believe that more legislation and another homelessness Bill like this will make it even more unsustainable because the unintended consequences that the Bill might bring in is increased numbers into temporary accommodation and increased length of time in temporary accommodation as well.”¹¹

29. They suggested its aims could be achieved through local policy and effective partnership working:

⁸ Local Government and Housing Committee, 19 June 2025, RoP p265

⁹ Local Government and Housing Committee, 19 June 2025, RoP p391

¹⁰ HSHAWB 52, WLGA

¹¹ Local Government and Housing Committee, 26 June 2025, RoP p12

“we’re already trying to achieve the aims and the principles that the Bill is attempting to bring in. And we absolutely agree with the principles and the ethos of the Bill. However, what we think will happen is it will encourage more people into a system that can’t cope already. And what the Bill will do is reduce personal responsibility for people’s housing circumstances and will push that balance towards the local authority by the removal of priority need, intentionality, and a reduction of the provision of unreasonable failure to co-operate. So, it will push more people into a system that already can’t cope, and it will undermine the principles that the Bill is trying to achieve.”¹²

30. While other local authority representatives shared concerns that some provisions may increase demand for services, support was voiced for other aspects of the Bill. Rhondda Cynon Taf County Borough Council (CBC) welcomed the prevention aspect, noting “the earlier that we can intervene and help people is really, really welcomed”. However, they shared concern that “other aspects will possibly increase the amount of people already coming into an overcrowded system when we don’t have housing supply to meet that need.”¹³

31. Newport City Council agreed that some aspects of the Bill, particularly the removal of intentionality and priority need “could really increase the pressure on our system”, and that:

“Unless we can find a sustainable flow of housing supply to meet that demand, I can’t see any other scenario than people spending longer in unsuitable, temporary accommodation.”¹⁴

32. Powys County Council raised concerns with housing supply:

“Wales is still facing a serious shortage of homes—especially ones that are genuinely affordable for people on low and middle incomes. The Bill doesn’t really tackle this core issue. Instead, it focuses on expanding people’s rights and increasing the responsibilities of housing authorities, without addressing the fact that in many areas, there simply aren’t enough homes available or accessible in the first place.”¹⁵

¹² Local Government and Housing Committee, 26 June 2025, RoP p15

¹³ Local Government and Housing Committee, 26 June 2025, RoP p19

¹⁴ Local Government and Housing Committee, 26 June 2025, RoP p22

¹⁵ HSHAWB 51, Powys County Council

33. Gwynedd Council raised concern that there has not been sufficient consultation with local authorities:

“we do not believe that the discussions so far have focused sufficiently on the views of local authorities and key stakeholders, who have essential knowledge in this area. A lack of consideration of practical issues on how this area operates day to day in drawing up the framework means that it does not reflect how it will affect frontline services.”¹⁶

34. The specific concerns raised by local authorities are considered in greater detail later in this report.

Resourcing

35. The WLGA referred to a net spend of £100.8m by councils on homelessness in 2025-26 and “significant concern across councils about the current financing of current levels of demand for homelessness services, let alone ensuring new duties and responsibilities under the Bill can be effectively implemented”. On the costs estimated in the Regulatory Impact Assessment (RIA), they noted:

“The financial analysis of the impact of the Bill as a whole is detailed but also complex, not easy to decipher even for seasoned financial experts. The assumptions behind some of the savings seem optimistic, not only in their scale but also in the timing of when they might be realised. While some of the data has been provided by councils, the information supplied did not always reflect the final proposals in the Bill and therefore may undermine elements of the assumptions made in the financial assessment.”

36. The WLGA called for the actual costs of implementation to be closely monitored, and for discussions to be held with the Welsh Government if costs are exceeding the level of funding provided. They said it will be “necessary to agree how this information will be collected at the beginning of the process and co-produced with local government”. They emphasised:

“It is crucial that Welsh Government commit to fully funding the financial implications of the Bill on an on-going basis.”¹⁷

¹⁶ HSHAWB 41, Gwynedd Council

¹⁷ HSHAWB 52, WLGA

37. Community Housing Cymru (“CHC”) also raised concern at costs associated with implementing the Bill, noting that “the wide-scale system change that is envisioned through the legislation must be matched by adequate funding for all the elements contained within it”. They told us:

“We are concerned that the Regulatory Impact Assessment (RIA) as drafted does not account adequately for the scale of increased demand on services and the knock-on impacts to other bodies, including RSLs. The very welcome move to supporting more people to stay in their homes will necessitate a real step change in the funding of programmes such as the Housing Support Grant (HSG).”¹⁸

38. Cymorth Cymru acknowledged that implementing the provisions “will need resourcing upfront in order to make sure that the intentions of this legislation are carried through” followed by continued commitment from future governments to build social housing and invest in support services. They did, however, view it as “an invest-to-save piece of legislation” arguing that the preventative measures “will end up relieving pressure on local authorities and on temporary accommodation”.¹⁹

39. Professor Fitzpatrick and Professor Peter Mackie also argued that the Bill will have a positive impact on demand for temporary accommodation, with the preventative elements reducing numbers moving in, and the duties on social landlords increasing numbers moving out.

40. Cymorth Cymru and Chartered Institute of Housing Cymru (“CIH Cymru”) emphasised the need for the Housing Support Grant (HSG) to be adequately funded to deliver homelessness support services, with Cymorth telling us that a well-funded grant is needed to enable “local authorities to meet need, and for staff to be paid a good wage to enable retention and recruitment of good-quality staff to deliver better outcomes”.²⁰

41. The Cabinet Secretary acknowledged the “significant practical and cultural change that this Bill requires” and told us that she recognises “the need for public services to be fairly funded and effectively and efficiently delivered”, and that “upfront investment is required”. She added that the upfront investment will

¹⁸ HSHAWB 14, Community Housing Cymru

¹⁹ Local Government and Housing Committee, 19 June 2025, RoP p271-272

²⁰ Local Government and Housing Committee, 19 June 2025, RoP p330

“result in a significant cost saving over time”. We heard that as a result, a phased approach to implementing the Bill is proposed.²¹

42. The Cabinet Secretary referred to the Welsh Government’s strategic partnership agreement with local government, “which says that where new responsibilities come with additional cost it may not always be about seeking that extra money, but about identifying funding that could be redirected from elsewhere to have that maximum impact, and, beyond that, any new responsibilities would be funded”. She added that future funding would be a matter for future governments.²²

Phased approach to implementation

43. A phased approach will be taken to implement the Bill’s provisions. Section 42 sets out that the provisions in Parts 1 and 2 of the Bill (and section 40 in Part 3) will come into force on a day appointed by the Welsh Ministers in an order made by Welsh statutory instrument. The Cabinet Secretary told us it is “likely that the implementation of the Bill will be grouped into those three main phases, each coming after a pre-implementation period”. We heard that the first phase would include implementing the prevention, support and allocations provisions, the ‘ask and act’ provisions will be included in the second phase of implementation and the final phase will see the abolition of the priority need and intentionality tests.²³

44. A Welsh Government official added that should Royal Assent take place in early 2026, the intention would be for a 12-month pre-implementation period to “develop much of the training and guidance, work with local authorities to transition between the systems, and prepare them for the changes”. The first implementation phase would be in 2027-28, the second phase in the following year and the latest date for commencing the provisions in the final phase of implementation would be 2030-31.²⁴

Wider interventions

45. We heard from several witnesses that a significant increase in the number of affordable homes is needed alongside the provisions in the Bill. The WLGA noted:

²¹ Local Government and Housing Committee, 18 September 2025, RoP p7

²² Local Government and Housing Committee, 18 September 2025, RoP p9

²³ Local Government and Housing Committee, 18 September 2025, RoP p24

²⁴ Local Government and Housing Committee, 18 September 2025, RoP p29

“An increased pace and scale in the development of housing, significantly increasing housing supply is critical for the reduction in homelessness, particularly the need for more affordable housing in line with identified current and future need. More social and affordable housing will enable councils to continue on the path of homelessness prevention and reduction. Without significantly increased access to housing to move people to permanent from temporary accommodation, even without any of the changes or additional duties and responsibilities set out in the Bill, risks undermining progress made so far and will lead to continued numbers of people presenting as homeless and living in temporary accommodation (and longer waits for those on social housing waiting lists).”²⁵

46. CHC also noted the need for more affordable homes and called for “quick progress in parallel to this legislation on taking forward recommendations from the recent affordable Housing Taskforce report, as well as tackling wider, systemic barriers to supply”.²⁶ Concern was raised by Monmouthshire Housing Association at “the current and projected shortfall in available housing stock” and that “it will be extremely challenging” to realise the ambition of ending homelessness in Wales “without a significant increase in the supply of suitable and affordable homes”.²⁷

47. Although the Bill and its focus on prevention was welcomed by CIH Cymru, they also told us that “new legislation alone cannot solve homelessness”, adding:

“We also need that adequate supply of cross-tenure affordable homes across Wales, and we also need to ensure that our workforce is at the right level to implement not only the current legislation, but any new legislation that comes up.”²⁸

48. Cardiff Council viewed an increase in housing supply and in Local Housing Allowance as the two key interventions that would have the greatest impact on people’s lives and preventing them from entering the homelessness system, rather than new legislation.²⁹

²⁵ HSHAWB 52, WLGA

²⁶ HSHAWB 14, Community Housing Cymru

²⁷ HSHAWB 13, Monmouthshire Housing Association

²⁸ Local Government and Housing Committee, 19 June 2025, RoP p393

²⁹ Local Government and Housing Committee, 26 June 2025, RoP p84

49. The Bevan Foundation also referred to the wider interventions needed alongside the Bill:

“We are concerned that the legal proposals will do little to bring homelessness rates down without significant additional funding for local authorities, wider intervention in the housing market and boosting the supply of affordable, long term social homes.”³⁰

50. The Welsh Refugee Council commented:

“Until the necessary housing supply is made available, the overall Welsh Government aim of making homelessness rare, brief, and unrepeatable will not be realised.”³¹

51. Tai Pawb expressed a similar view, noting that “the current target of 20K social homes in this Senedd term looks unlikely to be achieved”. They said that:

“To achieve the goals of this legislation, we will need to boost the supply of homes. In doing this, we must ensure that we build the right homes in the right places to address homelessness.”³²

52. The Wallich also noted that “the success or otherwise of this legislation will be largely dependent upon future Welsh Government’s ability to significantly increase the supply of affordable accessible housing”, adding that:

“Without enough appropriate homes support services will continue to struggle when moving people on from temporary accommodation, and prevention efforts will be significantly hamstrung.”³³

53. The Cabinet Secretary acknowledged that housing supply and the workforce are key aspects of delivering homelessness services. On meeting the Welsh Government’s target of 20,000 affordable homes by the end of this Senedd term, the Cabinet Secretary told us they are “doing everything we possibly can to achieve that”, adding that it is “a real priority” for the government.³⁴

³⁰ HSHAWB 45, Bevan Foundation

³¹ HSHAWB 03, Welsh Refugee Council

³² HSHAWB 07, Tai Pawb

³³ HSHAWB 08, The Wallich

³⁴ Local Government and Housing Committee, 4 June 2025, RoP p15-24

54. At a subsequent meeting, the Cabinet Secretary referred to “record levels of investment” of £2 billion this Senedd term to increase housing supply and that an implementation group has been established and met following the recommendations of the Affordable Housing Taskforce. The Cabinet Secretary emphasised:

“we’re going to leave no stone unturned in this. This is very much a focus not just within my portfolio, but across Government, and I’m determined to see the work that we can do in this housing supply area go as quickly as possible.”³⁵

Legislative competence

55. Upon the Bill’s introduction, the Presiding Officer’s statement on legislative consent noted that sections 14, 21, 22 and 32 require the consent of the UK Government and therefore, in her view would not be within the Senedd’s legislative until such consent has been obtained.

56. The Cabinet Secretary told us:

“Officials have been engaged with relevant UK Government departments for several months now on this. Engagement has involved operational-level discussions about policy aims, relevant Bill sections, and those practical implications should consent be granted. I believe that overall discussions have been positive and the discussions are, obviously, continuing. We’re working with Wales Office colleagues to manage the consent process. We’re in regular contact to support and respond to any questions either the Wales Office or relevant departments have had. We’ve engaged directly with Ministry of Housing, Communities and Local Government, DWP, the Ministry of Defence and the Home Office on the White Paper principles.”³⁶

Our view

57. We welcome the policy intentions behind the provisions in this Bill. Our work on housing and homelessness over recent years has consistently demonstrated the significant pressures on the system and the need to take action to address this. We recognise that this Bill has taken time to develop and we welcome the

³⁵ Local Government and Housing Committee, 18 September 2025, RoP p16

³⁶ Local Government and Housing Committee, 4 June 2025, RoP p131

input and commitment from stakeholders from across the housing sector in this process. Many of those involved with the Expert Review Panel gave evidence to us and spoke of the compromises made by all involved in order to achieve consensus on some of the provisions.

58. Having considered the evidence presented to us on the range of provisions in this Bill, we acknowledge that not all aspects are supported by all sides of the sector. However, the evidence presented to us was generally supportive of the general principles and we recognise that this Bill provides an opportunity to make a difference to the lives of people in need of homelessness support or social housing, and to the experience of the dedicated workforce. We have therefore concluded that we support the general principles. This report details our consideration of each of the provisions and our recommendations seek to make improvements where we believe these are needed to strengthen this legislation and make its implementation more effective.

Recommendation 1. We recommend that the Senedd agrees to the general principles of the Homelessness and Social Housing Allocation (Wales) Bill.

59. While we welcome the general principles of the Bill, we emphasise that legislation alone will not be enough to achieve the ambition of ending homelessness. While the Bill provides a framework for change, sufficient resources and housing supply will be key to deliver the changes. Stakeholders were clear in their evidence on the Bill and as we heard through our previous work on homelessness and social housing supply, increasing the availability of affordable homes is key, and without significantly more homes, people will continue to remain living in temporary accommodation for long periods. A major effort is needed from the Welsh Government and the housing sector to deliver more social housing, which will be crucial to the Bill's success. A cross-government focus on increasing the supply of social housing for the current and future Welsh Governments is crucial.

60. We note that the RIA does not include an estimate of how many new social homes are needed in Wales or the cost of delivering these, which is likely to be significant.

61. Whilst the Cabinet Secretary acknowledged the need to increase housing supply, we remain concerned that, as we near the end of this Senedd term, the Welsh Government are unable to provide any certainty as to whether their target of delivering 20,000 social homes for rent will be met. We have always been supportive of this aim, however as noted in our 2024 report on social housing supply, social housing needs to comprise a 'critical mass' of at least 20 per cent of

a nation's housing stock to create options for people and balance out prices in the private market. We noted that in Wales, social housing currently makes up only about 16 per cent of stock and that if Wales met the 20 per cent figure, we would have in the region of 60,000 more social homes than we currently have. This could make a significant difference. We therefore re-iterate our view that the Welsh Government should be more ambitious in its vision for social housing and plan beyond the timeframe of individual Senedd terms. We believe that the current Welsh Government can set a precedent for future governments by making the 20 percent aim a priority and providing appropriate funding in its forthcoming budget for 2026-27. Housing investment is preventative investment and as such it needs to be a higher strategic priority for the Welsh Government, not only to increase the level of government spending but also to ensure that policies across government are pulling in the same direction, to provide more social and affordable homes.

Recommendation 2. The Welsh Government should significantly increase the Social Housing Grant and Housing Support Grant for 2026-27 and, in addition find innovative ways of raising funds to deliver the supply of social housing needed to achieve the aims of the Bill.

Recommendation 3. The Welsh Government should ensure that delivering more social and affordable homes is a cross-government priority and is not undermined by other policies.

62. Resources will be key to delivering the aims of the Bill at pace and consistently across Wales. We note with concern that both the local government and social housing sectors questioned the estimated costs of implementing the provisions set out in the RIA. Whilst we recognise the Bill is intended to achieve longer term savings as a result of the preventative measures, we find the local authorities' scepticism about the RIA understandable. The scale of the current housing crisis could mean that any savings are swallowed up by the level of demand that local authorities will have to deal with.

63. There are also significant costs not accounted for, including to Social Housing Grant and Housing Support Grant, both of which will need substantial and sustained increases. We therefore believe that careful monitoring of the costs will be needed. The financial implications have been considered in greater detail by the Senedd's Finance Committee and we note its position that the Cabinet Secretary should provide assurances that the Welsh Government will continue to provide funding to local authorities beyond the initial years of implementation, should funding deficits arise as a result of benefits not being realised at the pace identified in the RIA. Although we recognise that there is a case for this, we feel

that all sectors need to demonstrate the local and national leadership needed to deliver the aims of the Bill. We believe there is a responsibility on all sectors, but that the Welsh Government will need to support the delivery through ensuring that sufficient resources are available.

64. We welcome the clarity provided by the Cabinet Secretary for the intended timescale for implementation of the provisions. The phased approach to implementation will be key to ensure sufficient preparation time and training for all those involved in delivery. We discuss this further through this report. However, we note that the intended timescale is not specified on the face of the Bill and feel that the sector would benefit from greater certainty. We will recommend to our successor committee in the Seventh Senedd that it seeks regular updates from the next government on the timing of implementing the provisions. Such updates will be crucial in providing certainty to the sector that full implementation of the legislation will take place by 2031.

65. We believe that greater clarity should be provided on the timescale for implementing the provisions in the Bill. We therefore recommend a requirement be included on the face of the Bill for the publication of a specific timetable setting out the phased approach to implementing the legislation.

Recommendation 4. We recommend the Bill is amended to place a duty on the Welsh Government to publish a specific timetable setting out the phased approach to implementing the legislation.

Recommendation 5. The Welsh Government should provide regular updates to the Senedd on progress in preparing for the implementation of this legislation, including an update no later than the end of 2029 on the steps it has taken towards full implementation.

Conclusion 1. In our legacy report at the end of this Senedd term, we will recommend to our successor committee that it seeks regular updates from the next government on the timing of implementing the provisions.

3. Part 1: Homelessness

The provisions in Part 1 of the Bill relate to Homelessness.

Help to prevent homelessness

66. Sections 1 and 2 of the Bill relate to preventing homelessness. Section 1 amends the 2014 Act so that a person is defined as “threatened with homelessness” if it is likely that they will become homeless within six months, rather than the current 56 days. The amendment also specifies that a person is threatened with homelessness if they have received written notice requiring them to give up occupation of their accommodation, or if an application has been made to the High Court or County Court for possession. In a letter to the Legislation, Justice and Constitution Committee, the Cabinet Secretary responded to a question about section 1(2)(a) and whether or not the Bill is broad enough to capture a range of possession notices, not just a notice issued under section 173 under the Renting Homes (Wales) Act 2016 (“the 2016 Act”).

67. The Cabinet Secretary stated:

“New section 55(4)(a) of the 2014 Act is intended to capture notices that require a person to give up occupation of their accommodation, whether fault-based or not. “Notice” in new section 55(4)(a) of the 2014 Act includes not only notices that may be served in relation to occupation contracts under the Renting Homes (Wales) Act 2016 but also notices that require a person to give up occupation of their accommodation, whatever the underlying arrangements.”

68. She added that:

“new section 55(4)(a) when considered together with paragraphs (b) and (c) of that section meet the policy intention. They allow not only people who are required to leave their homes to access help under the Act, but also those who may be required to leave their homes in the near future”.

69. Section 2 deletes section 65 of the 2014 Act and strengthens the wording of section 66 so that the local authority “must help to secure that suitable

accommodation does not cease to be available for occupation by the applicant, by taking reasonable steps likely to achieve that purpose”.

70. The EM sets out that “this amendment aims to increase the time period in which a local authority can work with an applicant to prevent homelessness occurring” and to “provide clarity to local authorities and applicants that notices seeking possession are a threat of homelessness”. It explains that the intention behind expanding the prevention period is that it will “encourage applicants to present earlier, before their situation has escalated and become more complex”. The Welsh Government believes this means that local authorities will “stand a stronger chance of preventing homelessness”.

71. The EM further explains that the extended prevention period aligns homelessness legislation with the 2016 Act, under which the holder of a periodic standard contract may be issued a Landlord’s Notice Seeking Possession on a ‘no fault’ ground giving six months’ notice. Such households will be able to present to a local authority as soon as they receive a notice, giving the authority “as long as possible” to prevent homelessness or identify alternative housing options.

72. The Cabinet Secretary told us that “a longer prevention period does mean that people can ask for help earlier” and gives “local housing authorities a better chance and more options to prevent homelessness”, adding:

“Local authorities have been very clear with us that they need more time to prevent homelessness. The current 56-day time period isn’t sufficient and it does delay people seeking help and then pushes them to the crisis point.

So, through extending the prevention period to six months, we will give local authorities and the applicant a greater opportunity to prevent homelessness from occurring.”³⁷

73. The provisions to extend the prevention period were broadly welcomed by the stakeholders we heard from. Cymorth Cymru told us that the current 56 day prevention period “is no longer sufficient to be able to resolve people’s housing issues, and extending that, therefore, to six months, is necessary”.³⁸ Professor Fitzpatrick and Professor Mackie both endorsed the extension. The Wallich, Tai Pawb, Housing Justice Cymru, the Bevan Foundation and the Welsh Refugee Council were also supportive of the provisions, with The Wallich noting that they

³⁷ Local Government and Housing Committee, 4 June 2025, RoP p46-47

³⁸ Local Government and Housing Committee, 19 June 2025, RoP p262

will enable housing services to “get appropriate support in place sooner, and manage caseloads more effectively”.³⁹

74. Shelter Cymru described the expanded prevention period as “a positive step” and said it is a “welcome recognition of the need to provide support to people at the earliest stage possible”. Shelter Cymru told us that, if implemented correctly, the extended prevention duty could lead to “fewer people reach[ing] the stage of needing temporary accommodation” which would hopefully relieve pressure on the system.⁴⁰ However, they noted that ensuring the extension delivers practical impact for individuals and households will “require more than just legislative change” and that they would like to understand how the Welsh Government will work with local authorities to enable them to focus greater officer time on prevention measures.⁴¹ Similarly, Housing Justice Cymru stated:

“it is vital that this provision translates into practice with local authorities resourced to undertake prevention work with individuals at the point at which they present.”⁴²

75. Despite welcoming the extension, the Bevan Foundation referred to “concerns about how meaningful this extension will be in practice, and what will actually happen at the early stage of the 6 month period”.⁴³

76. We heard that some local authorities have already implemented an expanded prevention period, including Cardiff, Conwy, Neath Port Talbot and Wrexham. Neath Port Talbot CBC commented:

“The Policy intention has already been considered and implemented in Neath Port Talbot prior to the introduction of the Bill. This can only have a positive impact on clients and ensures early intervention support is provided and homelessness is rare, brief and unrepeatable.”⁴⁴

77. Despite supporting the principle of a six month prevention period, Cardiff Council raised concern that its effectiveness is limited due the shortage of affordable housing options:

³⁹ HSHAWB 08, The Wallich

⁴⁰ Local Government and Housing Committee, 19 June 2025, RoP p163

⁴¹ HSHAWB 12, Shelter Cymru

⁴² HSHAWB 42, Housing Justice Cymru

⁴³ HSHAWB 45, Bevan Foundation

⁴⁴ HSHAWB 16, Neath Port Talbot County Borough Council

“Homelessness services already assist people up to six months before they face homelessness. Despite these efforts, finding suitable accommodation to prevent homelessness remains challenging due to the difficult housing market.”⁴⁵

78. CIH Cymru acknowledged that an extended period will provide more time and scope for prevention work, but felt that “it is also likely to increase both the numbers owed a duty and the accompanying paperwork that accompanies rising caseloads”, adding:

“We are concerned that any additional administrative burden, by its nature needing to be person-centred and transparent at all stages, will overload an already stretched workforce at local authority level.”⁴⁶

79. Swansea council expressed concern at extending the timescales from 56 days to 6 months, stating that it is “too long” and that “circumstances can change considerably in a 6 month period”. They added:

“It means that there will be significantly more cases for caseworkers to manage at any given time and will add further pressure to services that are already under significant strain. It will undoubtedly require additional resources to manage the increased workload.”⁴⁷

80. The NRLA noted that it “supports the increase of the prevention period to six months to align with RHW legislation” and despite acknowledging that this change “should enable households to seek support as soon as a Section 173 notice is received”, raised concern that local authorities will “continue to advise tenants to “stay put”, despite the Bill’s intent”. They added:

“We particularly believe this will be the case where the private rented sector stock continues to shrink and local authorities face resource constraints. Financial pressures coupled with the proportionally larger number of fault-based claims mean that local authorities are unlikely to be able to fully assess applications.”⁴⁸

⁴⁵ HSHAWB 35, Cardiff Council

⁴⁶ HSHAWB 28, CIH Cymru

⁴⁷ HSHAWB 44, Swansea Council

⁴⁸ HSHAWB 19, National Residential Landlords Association

81. On wider provisions relating to reviews, Professor Fitzpatrick told us it was unclear whether someone could request a review of whether a local authority had undertaken the reasonable steps required during the six-month prevention period.⁴⁹ Shelter Cymru told us that the review rights should be accompanied by access to independent expert advice.⁵⁰

82. The Cabinet Secretary confirmed that the Bill does provide an applicant with a right to request a review at any time while the plan is maintained, and that right of review includes a review of the appropriateness of the steps to be taken by the authority during a six-month period.⁵¹

83. The Cabinet Secretary cited Neath Port Talbot CBC as an example of a local authority who have already restructured their services to more preventative practice in anticipation of the Bill and are now reporting a prevention rate of 80 per cent.

84. We discussed with the Cabinet Secretary work being done by the Welsh Government to share best practice across local authorities, she told us:

"We have organised some best practice events across Wales, where local authorities can share their experiences. We've had learning events, enabling local authorities to hear and see some of that innovative practice, just from further afield, such as the work that's going on in Manchester, and also the work that's going on in Scotland.

*We've also got a rapid rehousing summit, to showcase some of those progressive approaches, later this month."*⁵²

Our view

85. We welcome the provisions in the Bill to extend the amount of time local authorities have to work with people at risk of homelessness with the aim of identifying a suitable solution and prevent them from becoming homeless. Preventing homelessness is key and increasing the amount of time available could make a significant difference. We note the Cabinet Secretary's evidence that some local authorities have already restructured their services to focus more on prevention and that some have started to see the results of this. We believe

⁴⁹ Local Government and Housing Committee, 19 June 2025, RoP p89

⁵⁰ Local Government and Housing Committee, 19 June 2025, RoP p209

⁵¹ Local Government and Housing Committee, 18 September 2025, RoP p91

⁵² Local Government and Housing Committee, 18 September 2025, RoP p79-81

that, where such interventions are proven to be successful, it will be crucial to share the lessons learned with other local authorities who will be able to benefit from the experiences. We recognise the efforts already being made by the Welsh Government to disseminate this knowledge, however we feel they should take more proactive steps beyond dissemination to ensure that this best practice is adopted.

86. While we welcome the extended prevention period, we recognise the concerns raised by some stakeholders that the provisions will only be effective if implemented properly. It will be crucial that local authorities use the extended period in its entirety so that the prevention work starts as early as possible. We welcome the Cabinet Secretary's clarification that review rights will be available to applicants within the six-month prevention period, which will help ensure that reasonable steps are being taken in a timely way. We also recognise that the availability of viable accommodation options will be a factor in the effectiveness of increasing prevention rates.

Assessment of needs and plans for securing accommodation and support and reviews

87. Section 3 amends section 62 of the 2014 Act to require that when a local authority carries out an assessment of an applicant's housing situation, the applicant's support needs are included and that local authorities have regard to those views. It also requires assessments to include any support needed by the applicant to understand communication from the local authority. This is intended to make letters and other forms of communication easier for applicants to understand.

88. Section 4 amends the 2014 Act to insert a new provision that places a duty on local housing authorities to prepare and maintain a Prevention, Support and Accommodation Plan ("PSAP") for applicants owed a homelessness duty. This further develops the current Personal Housing Plans ("PHPs"). The section outlines the process for preparing a PSAP and sets out the circumstances in which local housing authorities must review the PSAP. The EM says that the PSAP is intended as a tool to support a person-centred, trauma-informed approach to homelessness.

89. The Cabinet Secretary explained that the PSAP will “provide a formal record of the steps to be taken to prevent homelessness and will be developed jointly between the applicant and the local authority”.⁵³

90. Section 5 amends the 2014 Act to give applicants new rights of review in relation to the following decisions and assessments made by a local housing authority:

- a decision not to carry out an assessment of a person’s case;
- an assessment of housing needs;
- an assessment of support required to retain accommodation or overcome barriers to living independently; and
- a PSAP.

91. The introduction of new rights of review is intended to provide greater transparency and accountability.

92. This section also amends an existing right to review in relation to the suitability of accommodation offered by a housing authority. It expands the existing timescales so that applicants can request a review at any time before accepting an offer. After accepting an offer, applicants can request a review within six months of the accommodation being made available, or at any time when a section 66, 68 or 75 duty under the 2014 Act applies. This is intended to help reduce repeat homelessness by ensuring more applicants can access the right accommodation at the right time.

93. Most witnesses were in favour of the introduction of PSAPs, including the Wallich, Welsh Refugee Council, Professor Mackie and the Children’s Commissioner for Wales. Cymorth Cymru told us that PSAPs will help to make sure that support need is assessed and that the “appropriate mechanisms are in place to make sure that people get the support”.⁵⁴

94. Despite supporting their introduction, some stakeholders suggested changes to the provisions on PSAPs, in line with recommendations made by the Expert Review Panel. Professor Mackie referred to the requirement for a housing authority to try to agree with the applicant “any steps the applicant is to take”, which he said the Panel did not recommend the inclusion of. He recommended

⁵³ Local Government and Housing Committee, 4 June 2025, RoP p49

⁵⁴ Local Government and Housing Committee, 19 June 2025, RoP p326

serious consideration be given to “refocussing the PSAPs on support needs, aspirations, and the reasonable steps the local authority plans to take – excluding steps households might take”.⁵⁵ Crisis urged that PSAPs should also include “reference to recording the applicant views on suitability – as was suggested by the panel”.⁵⁶

95. Shelter Cymru said that the mandating and standardisation of PSAPs are “a clear improvement on the current arrangements” and that the provisions demonstrate “a move towards a more person-centred, trauma-informed way of working”. They referred to variations in local authority current practice around PHPs and called for clearer guidance on PSAPs alongside proper resourcing and training to “make the plans meaningful and effective”. They also welcomed the extended rights of review for applicants, set out in section 5, but again called for guidance, including on the “need to provide applicants with adequate information to activate these rights of review – including signposting to free, quality assured, independent advice options”.⁵⁷

96. Llamau also called for statutory guidance on the development and implementation of PSAPs, adding:

“These plans must be person-centred and trauma-informed, and guidance will help ensure consistency across Wales while allowing for local adaptation.”⁵⁸

97. Concern was raised by several local authorities that the implementation of PSAPs, additional review points, and a potential increase in presentations would take up more time for frontline staff. The WLGA agreed that PSAPs should be reviewed every eight weeks during the prevention period but called for an amendment to review PSAPs less often during the section 75 homelessness duty period, as this would be “exceptionally time-consuming” for local authorities and potentially frustrating for applicants during their temporary accommodation stay. They argued that during this period, applicants with support needs would already have monthly reviews with their allocated support worker and called for local authorities to be able to determine the level of applicant need and adjust the timeliness of the review accordingly.⁵⁹

⁵⁵ HSHAWB 06, Professor Peter Mackie, Cardiff University

⁵⁶ HSHAWB 43, Crisis

⁵⁷ HSHAWB 12, Shelter Cymru

⁵⁸ HSHAWB 49, Llamau

⁵⁹ HSHAWB 52, WLGA

98. Some local authorities estimated the potential increase in staff workload, with Carmarthenshire County Council suggesting that it “could result in 56 hours spent on PSAP related reviews for a single case over a six-month period”⁶⁰. Cardiff Council noted that, although the PSAPs “are a constructive development”, the regular reviews “will add considerable strain”, adding:

“Cardiff Council could be required to complete over 2,000 PSAPs every two months. Meeting this level of demand will require substantial investment- both in staffing and other financial resources- to ensure services can respond effectively.”⁶¹

99. Pembrokeshire County Council raised concern that they would be unable to meet the demand within current resources⁶², while Flintshire County Council told us that “finance is a huge risk in terms of additional contact points with residents” and that there will be challenges around resourcing the front-line staff time needed.⁶³

100. Monmouthshire County Council queried the RIA’s estimated four hours timeframe for completing a PSAP, noting that it is not “entirely clear whether this four-hour allocation relates to the creation of the PSAP only, or whether reviews throughout the applicant’s journey are included in this time frame”. They added:

“If the former the RIA does not take into consideration the burden of reviewing PSAPs on an eight-weekly basis. If the latter, then this is an unrealistic time frame. It is not uncommon for an applicant to be owed a homeless duty in excess of 18 months. Four hours across this lifecycle will not go very far.”⁶⁴

101. Swansea Council went further by stating that “mandating the need for PSAP’s is unnecessary”. They suggested that the provisions could result in the case officer spending “more time completing the PSAP rather than with the individual trying to prevent their homelessness”. They went on to note that reviewing PSAPs after eight weeks could potentially “raise the expectations of the individual that there will be an outcome at this point”.⁶⁵

⁶⁰ HSHAWB 52, WLGA

⁶¹ HSHAWB 35, Cardiff Council

⁶² Local Government and Housing Committee, 26 June 2025, RoP p99

⁶³ Local Government and Housing Committee, 26 June 2025, RoP p95

⁶⁴ HSHAWB 38, Monmouthshire County Council

⁶⁵ HSHAWB 44, Swansea Council

102. A differing view was offered by Ynys Môn County Council who welcomed the eight week review point.⁶⁶

Our view

103. We support the introduction of prevention support and accommodation plans, in particular the consistency their use should bring for applicants across Wales if all local authorities are following the same approach. We understand the importance of applicants being able to input their views on the right housing outcome for them, and these plans provide an opportunity for this to happen routinely.

104. We acknowledge the concerns raised by local authorities at the potential resource implications of undertaking regular reviews of PSAPs and whilst we appreciate their reservations, we feel that the plans will be beneficial. We note the suggestion made by the WLGA that local authorities should be able to determine the level of applicant need and adjust the timeliness of the review accordingly, however we are concerned that this could lead to inconsistencies across Wales and some people missing out on having their situation reviewed. The concerns of local authorities should not be discounted though, and we would encourage the Welsh Government to engage further with them to understand their position and provide additional support if needed.

Conclusion 2. The Welsh Government should engage further with local authorities to understand their concerns on the level of resource needed to implement provisions relating to the prevention support and accommodation plans.

Reform of duties to secure accommodation

Persons with a local connection

105. Section 6 removes the existing duty under section 73 of the 2014 Act to help secure accommodation for homeless applicants. This is because the proposed removal of the priority need (section 9) and intentionality tests (section 10) would render this duty unnecessary.

106. A new section substitutes section 75 of the 2014 Act to set out the circumstances in which a local housing authority must secure that suitable accommodation is available for occupation. This is intended to simplify

⁶⁶ HSHAWB 39, Isle of Anglesey County Council

homelessness legislation and to ensure that interim and settled accommodation is available to those who need it.

107. The duty applies if the local housing authority is satisfied the applicant is homeless, or has suitable interim accommodation as a result of being homeless or threatened with homelessness. The applicant must also be eligible for help.

108. The new section 75(4) creates a new concept of ‘no local connection to Wales’. It provides that local authorities “will no longer have to accept a duty to secure accommodation for those with no local connection in Wales”. This exemption to the duty does not apply in circumstances where the applicant, or any member of the applicant’s household, are at risk of suffering abuse. The new section 75 also provides for a regulation making power to exempt prescribed categories of people from the local connection to Wales test. For prisoners serving custodial sentences, the duty does not apply if there is no reasonable prospect of release within six months. The new ‘local connection to Wales’ test is intended to work alongside the existing local connection test applied at local authority level.

109. The EM explains that the Welsh Government has “taken this approach to ensure Welsh local authorities are able to operate in a way which ensures the fair distribution of costs across Wales and manages finite resources within Wales”. The Cabinet Secretary elaborated by explaining that the local connection provision is “a key tool” in ensuring that local authorities are “resourced and focused on people in their communities”, adding that the changes in the Bill “benefit people in Wales”. She went on to explain that the provisions differed from the original proposal in the White Paper to introduce more exemptions to the existing local connection test (section 81 of the 2014 Act), as the Welsh Government had encountered “complexities” around cross border implications. She said it is vital to ensure homelessness services are “focused on the people of Wales and our communities, otherwise we won’t be able to achieve the aims of the Bill”.⁶⁷

110. Participants in our focus groups shared their experiences of local connection:

“When I was on the street they told me to relocate back to England, because that’s where I come from. Yet my family live in the Rhondda. Cardiff isn’t close enough to the Rhondda so I was told to go back to England. It wasn’t until [Contributor 1] got me a waiver on the local thing.”

⁶⁷ Local Government and Housing Committee, 4 June 2025, RoP p78-82

“So I used to do that job many moons ago, so [Participant 1] accessed the reconnection service and needed support to have a waiver because [Participant 1] had been so transient, we were able to evidence that he actually doesn’t have a local connection anywhere. That story is quite familiar for a lot of people who find themselves in Cardiff.”

Focus group participants

111. Professor Fitzpatrick told us that she “cannot see the purpose” of the local connection to Wales provision as it does not change anything “materially from the current legal position”, explaining:

“at the moment, if someone from England applies to a Welsh local authority and they don’t have a local connection with that Welsh local authority, and they do have local connection with a local authority in England, they can be referred back at the main stage anyway.”⁶⁸

112. Local authority representatives unanimously agreed that the creation of the new local connection to Wales test is “really positive” and that there are “no issues” with it.⁶⁹ CHC told us they understand why the Bill has not “gone further” on local connection but retain their position that “there are some cases where people don’t have a local connection and should still be supported, such as veterans and care leavers and refugees and people from LGBTQ+ communities”.⁷⁰

113. Although Cymorth Cymru did not support local connection as it can disadvantage people “particularly from marginalised groups”, they understood “why it is very important to local authorities” and told us that they “accept that.” However, they expressed disappointment that the groups of people suggested by the Expert Review Panel for exemption have not been included in the Bill.⁷¹ This view was supported by The Wallich.⁷² Cymorth Cymru and The Wallich voiced support for exempting people for whom returning to a locality would be harmful, such as people escaping alcohol or substance misuse or criminal behaviour.⁷³

⁶⁸ Local Government and Housing Committee, 19 June 2025, RoP p61

⁶⁹ Local Government and Housing Committee, 26 June 2025, RoP p92-93

⁷⁰ Local Government and Housing Committee, 26 June 2025, RoP p281

⁷¹ Local Government and Housing Committee, 19 June 2025, RoP p308-310

⁷² Local Government and Housing Committee, 19 June 2025, RoP p312

⁷³ Local Government and Housing Committee, 19 June 2025, RoP p322-323

114. Shelter Cymru also supported exemptions for “certain vulnerable groups” and told us that referrals risk leading to street homelessness as they “don’t necessarily mean people move on.”⁷⁴

115. Crash Wigley and Liz Davies KC highlighted a potential loophole in the local connection to Wales test, which could mean that applicants without a local connection anywhere could be excluded and “left drifting”, whereas current legislation provides that people with no local connection anywhere are the responsibility of the local authority to which they apply.⁷⁵

116. Professor Fitzpatrick said her preference would have been for the exemptions proposed in the White Paper to have carried through to the Bill, but she was pleased there are “regulatory powers to do more on this in the future.”⁷⁶ Several witnesses, including Professor Mackie, Professor Fitzpatrick⁷⁷, Shelter Cymru,⁷⁸ Cymorth Cymru⁷⁹, The Wallich⁸⁰, Crisis⁸¹, G4S Community⁸², Clinks⁸³ and the National Youth Advocacy Service (NYAS)⁸⁴ said they would be in favour of putting exempt categories on the face of the Bill, with a view to reinstating local connection for those categories in future if it leads to unmanageable impacts.

117. We heard from His Majesty’s Prison and Probation Service (HMPPS) that it would be helpful to have flexibility to exempt prison leavers from the existing local connection test as there are “certain circumstances where people may benefit from a fresh start” and suggested a reciprocal arrangement between local authorities.⁸⁵ Clinks described not using the Bill to exempt prison leavers from the local connection test as “a missed opportunity” given that returning to a home area may place them at risk or against their licence.⁸⁶ HMPPS and G4S Community called for clear guidance to ensure a consistent approach when it would be advantageous for a prison leaver to move to a different area.⁸⁷

⁷⁴ Local Government and Housing Committee, 19 June 2025, RoP p194

⁷⁵ Local Government and Housing Committee, 19 June 2025, RoP p191-193

⁷⁶ Local Government and Housing Committee, 19 June 2025, RoP p66-67

⁷⁷ Local Government and Housing Committee, 19 June 2025, RoP p73-74

⁷⁸ Local Government and Housing Committee, 19 June 2025, RoP p198

⁷⁹ Local Government and Housing Committee, 19 June 2025, RoP p314

⁸⁰ Local Government and Housing Committee, 19 June 2025, RoP p316

⁸¹ Local Government and Housing Committee, 19 June 2025, RoP p451

⁸² Local Government and Housing Committee, 26 June 2025, RoP p525

⁸³ Local Government and Housing Committee, 26 June 2025, RoP p526

⁸⁴ Local Government and Housing Committee, 19 June 2025, RoP p612

⁸⁵ Local Government and Housing Committee, 26 June 2025, RoP p509

⁸⁶ Local Government and Housing Committee, 26 June 2025, RoP p512

⁸⁷ Local Government and Housing Committee, 26 June 2025, RoP p510 & 514

118. Welsh Women's Aid told us they were "delighted that the exemption for survivors of VAWDASV is included in the Bill" as it is "critical to the way that refuge system works" and that it is critical that the provision remains.⁸⁸ However, they felt that clarity is needed on the "immediacy clause" in the new section 75 of the 2014 Act as it could be "open to a lack of consistent application between local authorities".⁸⁹

119. In response to the evidence we heard on including exemptions to the existing local connection test for some groups on the face of the Bill, the Cabinet Secretary told us that she intends to consider making further exemptions in the future and recognised that there "may be particular groups that can be disadvantaged by the concept of local connection". However, her view is that this "has to be done in a managed way to manage the risk of potential discrimination" and that "any differential treatment for particular groups has to be justified with that robust evidence". She added:

*"There is more work for us to do as the evidence has to be considered for all groups, not just certain groups. We have to look across the board. There is work to do there, but ensuring we get the balance right and managing all the risks is vital. The Bill gives us a mechanism to do that and we can consult and prepare regulations that the Senedd would be asked to approve before the requirements came into force."*⁹⁰

120. In response to the potential loophole cited to us, which could mean that applicants without a local connection anywhere could be excluded, a Welsh Government official told us that they "are aware there are a small number of people who might fall into this category" but that "the special circumstances aspect of the local connection element within the Bill provides that flexibility to enable local authorities to be able to support someone". The Cabinet Secretary reiterated that "there will be that exemption that local authorities would be able to help" the "small number of people" who fall in to the category of having no local connection.⁹¹

Our view

121. We recognise from the evidence presented to us that some stakeholders are uneasy at the prospect of not only retaining local connection in its current form

⁸⁸ Local Government and Housing Committee, 19 June 2025, RoP p318

⁸⁹ Local Government and Housing Committee, 19 June 2025, RoP p338

⁹⁰ Local Government and Housing Committee, 18 September 2025, RoP p61-62

⁹¹ Local Government and Housing Committee, 18 September 2025, RoP p73-75

but also creating a new local connection to Wales test. We agree that, ideally, such tests would not be needed and should not play a part in a truly trauma-informed system. We note that the Welsh Government's own White Paper cited evidence that some people might choose to remain homeless in a local authority area even after assistance had been refused due to lack of local connection. However, we also understand the basis for local authorities' concerns. We appreciate that local connection is an important provision for local authorities to manage their scarce resources, and we recognise that other elements of this Bill are increasing pressure on those resources. Therefore, on balance, we support its inclusion in the Bill.

122. Given that local authorities may already refer applicants to English local authorities if they have a local connection there, we remain unclear about how much practical difference the new local connection to Wales test will make. However we accept the Welsh Government's arguments that local connection is a complex concept and that unintended consequences can be severe if legislation is not drafted in a precise way. We appreciate that the new test sends a clear message about who is entitled to support in Wales.

123. We welcome the provision to exempt an applicant from the test if they, or a member of their household, is at risk of suffering abuse. It is right that such an exemption should remain in place to protect this vulnerable group and we welcome the broadening of the definition of abuse in section 28.

124. We recognise that such an exemption from the existing local connection test would also be beneficial for several other categories of people, particularly those highlighted in the original White Paper, and remain concerned that this is not the case. However, having discussed with the Cabinet Secretary the potential for exempting other groups on the face of the Bill, we understand and accept her rationale that the risk of discrimination must be managed correctly. We welcome the assurance provided by the Cabinet Secretary that she will consider whether further groups could be exempted in future, and that following further work and evidence gathering, this could be done through secondary legislation. We recommend that the Welsh Government undertakes further work to gather evidence on whether additional groups of people should be granted exemption to the local connection test.

Recommendation 6. The Welsh Government should undertake further work to gather evidence on whether additional groups should be granted exemption to the local connection test.

Circumstances in which the duty to secure accommodation comes to an end

125. Section 7 amends the 2014 Act to expand the circumstances in which the main section 75 housing duty can be brought to an end. It makes provision for local authorities to use a broader range of accommodation options when discharging the duty, which would have been available under the (removed) section 73 duty to help to secure accommodation, but not under the main section 75 housing duty. This includes previous or family homes (if safe) or supported lodgings.

126. The section requires local authorities to ascertain that the accommodation is suitable, is likely to be available to occupy for a period of at least 12 months (increased from the current six months), and that the applicant agrees that the duty should end. The EM states that the provision is deliberately wide to allow ongoing agreement with stakeholders on appropriate forms of accommodation.

127. The section also sets out the circumstances in which duties owed to a person serving a custodial sentence may be brought to an end. This is intended to provide more clarity, and to ensure local authorities do not owe duties where there is no prospect of undertaking meaningful work.

128. The Cabinet Secretary told us that, in providing for use a broader range of accommodation options, the Bill includes a “range of safeguards” to ensure the interests of person accepting one of those offers are protected, including that any home offered must be safe, suitable and available for at least twelve months and that the local housing authority would be required to follow up within six months with anyone accepting an offer. She added that further safeguards, such as those set out in the White Paper are “better established in the guidance”.⁹²

129. A Welsh Government official went on to add that anyone offered these forms of accommodation “is able to explicitly consent to them, and that obviously means they also have the power to veto them”. The official told us that other safeguards such as access to appropriate advice services and the suitability of accommodation “are not really appropriate for inclusion in a Bill”.⁹³

130. Although all witnesses supported allowing the main section 75 duty to be discharged with a wider range of accommodation options, some called for a requirement on the face of the Bill for independent housing advice to be offered prior to the duty being discharged via this route, in line with the Expert Review

⁹² Local Government and Housing Committee, 4 June 2025, RoP p56-57

⁹³ Local Government and Housing Committee, 4 June 2025, RoP p58

Panel recommendation, so that applicants' consent may be informed by independent advice. Crash Wigley explained that accessing independent advice would allow individuals to have "sensitive conversations" about any concerns they may have about accepting an offer:

*"The opportunity to have a real conversation about those concerns with an independent adviser who you really trust is really important to ensure that these arrangements are going to suit that person in reality."*⁹⁴

131. Crisis welcomed the safeguards already in the Bill, but felt that having independent advice would "tie it all together and would really help", adding that:

*"An offer of independent advice, and having it on the face of the Bill, would be really helpful to make sure that that person makes that decision fully informed."*⁹⁵

132. Professor Fitzpatrick told us that a person having access to independent advice also provides protection to local authorities from legal challenge as "the local authority can be more confident that this is a defensible position" as it "really is a genuine consent if that person has had access to independent advice".⁹⁶ Liz Davies KC shared a similar view, expressing that "what you want is clarity on the face of the Bill", she concluded that the provision is "a good thing" but that "it needs a little tinkering with".⁹⁷

133. End Youth Homelessness Cymru (EYHC) supported the reference to supported lodgings and supported accommodation, but they along with Voices from Care called for caution so that family mediation is not a default intervention for young people if returning home is not a safe option for them. EYHC told us:

*"I'd be nervous in supporting something that doesn't allow or doesn't support or have those safeguards in place for certain groups of young people, where that return to home might then be forced upon them by a well-meaning practitioner who doesn't maybe understand the full picture or full situation."*⁹⁸

⁹⁴ Local Government and Housing Committee, 19 June 2025, RoP p219

⁹⁵ Local Government and Housing Committee, 19 June 2025, RoP p479

⁹⁶ Local Government and Housing Committee, 19 June 2025, RoP p117

⁹⁷ Local Government and Housing Committee, 19 June 2025, RoP p218

⁹⁸ Local Government and Housing Committee, 19 June 2025, RoP p623

134. Professor Mackie called for the collection of data to accompany these legislative reforms to:

“enable us to look at who is allocated into what sort of housing solution and who ends up, perhaps, coming back into the system or where that fails that lets us then at least monitor whether there are any unintended consequences, for instance certain groups of the population consistently not getting access to social housing or accessing a particular form of the private rented sector. But that would enable us to monitor any potential impacts of this on particular groups.”⁹⁹

135. Section 8 amends the existing duty to provide interim accommodation, to take account of the abolishing of priority need and the removal of the section 73 duty to help secure accommodation. It requires local authorities to provide interim accommodation where they believe an applicant is homeless and eligible but have not yet confirmed these matters. It also requires the duty to be owed to applicants who do not have a local connection to any local authority area in Wales, where the local authority believes the applicant is homeless and eligible for help.

136. The Cabinet Secretary told us that “this additional flexibility is not built in to allow for lesser quality accommodation”. In response to the evidence that applicants should be offered independent advice, she confirmed that “current legislation sets out a duty to provide information, advice and assistance in accessing help when envisaging the need for signposting to independent legal and housing advice”. The Cabinet Secretary referred to the [Code of Guidance](#) for Local Authorities on the Allocation of Accommodation and Homelessness (Code of Guidance), which:

“already encourages local authorities to signpost applicants towards accessible, impartial advice, and the Welsh Government funds national advice services through the single advice fund and homelessness prevention grant.”¹⁰⁰

Our view

137. We understand the rationale for the provisions to broaden the range of accommodation options available to local authorities when discharging their duty

⁹⁹ Local Government and Housing Committee, 19 June 2025, RoP p111

¹⁰⁰ Local Government and Housing Committee, 18 September 2025, RoP p100

to secure accommodation and recognise that these were generally supported by stakeholders. We are, however, cognisant of the emphasis put on the importance of ensuring applicants have access to independent advice prior to agreeing to accept one of these forms of accommodation. We agree that all applicants in this situation should have access to independent advice in order to be able to make an informed decision. Although this is not specified on the face of the Bill, we are reassured by the Cabinet Secretary's confirmation that guidance does and will continue to encourage local authorities to signpost applicants towards impartial advice. However, we note that the guidance currently says that the duty can be met "in a number of ways" as the legislation itself is silent on this. We therefore believe that the guidance should be strengthened to signpost to independent advice, as well as providing services themselves, or being able to continue best practice if they consider that it is working well.

Recommendation 7. The Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness should be strengthened to signpost applicants to independent advice.

Abolishing entitlement by reference to priority needs and intentional homelessness

138. Sections 9 and 10 respectively amend the 2014 Act to abolish the priority need and intentionality tests. The RIA states that these provisions are likely to be enacted in 2030-31 at the earliest. The Cabinet Secretary told us she has listened to "the concerns of local authorities" and that a phased approach is necessary to ensure effective implementation and "that we take local authorities with us", adding:

*"We've used 2030-31 to aid planning the cost of the implementation of the Bill. The exact timescales and the phasing of the implementation need to be agreed in discussion with local authorities."*¹⁰¹

139. Local authority representatives and those who responded to our written consultation expressed concern that, although the tests are rarely used, their abolition may lead to more pressure on the homelessness system. Wrexham CBC noted that an implementation date of 2030 – 31 "will not give Local Authorities enough time to prepare for and implement the changes necessary".¹⁰²

¹⁰¹ Local Government and Housing Committee, 4 June 2025, RoP p65-66

¹⁰² HSHAWB 27, Wrexham County Borough Council

140. A different view was expressed by Crisis who said that ending priority need now, rather than in 2030-31, would save an additional 5,500 people from experiencing homelessness by 2040.¹⁰³ Similar views were expressed by Cymorth Cymru and The Wallich¹⁰⁴. Professor Fitzpatrick referred to the ten year implementation period for abolishing priority need in Scotland as “too long” and cautioned against “taking too long to implement the legislation.”¹⁰⁵ Liz Davies KC referred to current inconsistencies in approach across local authorities “with some still hanging on to priority need and intentionality” as a “potential argument in favour of bringing in the abolition of those requirements sooner rather than later”.¹⁰⁶

Abolition of the priority need test

141. Section 9 amends the 2014 Act to remove the priority need test. This is intended to ensure that everyone who is homeless, or at risk of homelessness, and who present to local authorities will be provided with support and accommodation where they are eligible and have a local connection.

142. The Bill provides for the abolition of the priority need test to be commenced on a date appointed by the Welsh Ministers via statutory instrument. The EM states this is in recognition of the fact that local authorities cannot assist people facing homelessness without a “robust housing supply that meets a range of needs”, and is “in line” with recommendations from the Expert Review Panel.

143. Most witnesses supported the abolition of priority need, with Professor Fitzpatrick describing it as “absolutely essential”. She told us:

“single homeless people in Wales do not have, as a matter of law, entitlement to rehousing and people are still shut out of that material assistance because of priority need. It’s a rationing device that is used to shut some people out of rehousing assistance altogether. If Wales wants to move to a position where it ends homelessness, you have to end priority need.”¹⁰⁷

¹⁰³ Local Government and Housing Committee, 19 June 2025, RoP p412

¹⁰⁴ Local Government and Housing Committee, 19 June 2025, RoP p281-282

¹⁰⁵ Local Government and Housing Committee, 19 June 2025, RoP p18

¹⁰⁶ Local Government and Housing Committee, 19 June 2025, RoP p175

¹⁰⁷ Local Government and Housing Committee, 19 June 2025, RoP p25

144. A similar view was expressed by Cymorth Cymru who described the priority need test as “an exclusionary measure”, adding:

“it is not about giving a small group of people an advantage, it’s about excluding a small group from being able to get the very basic help through the homelessness system.”¹⁰⁸

145. Stakeholders representing young people supported the principle of ending priority need, or recognised it “as the right thing to do” in the long term. However, some had concerns that it might lead to greater competition for social housing between homeless young people and other homeless applicants. EYHC referred to concerns expressed by young people where they were “very reticent to be giving up something they see as providing them with a benefit”. However, EYHC said it still supported ending priority need because the young people had misinterpreted the test as “us versus them”, when this view “doesn’t ring true with how the legislation lays it out”.¹⁰⁹ Voices from Care told us it is hard to see how “children that the state has taken away from their family should not have a priority”.¹¹⁰ This concern was also raised by the Children’s Commissioner for Wales who noted that “the new arrangements may now impede local authority’s ability to find this cohort suitable accommodation.”

146. NYAS called for care leavers to have priority need as an interim measure until priority need is abolished, as per the White Paper proposal.¹¹¹

147. Professor Mackie said that ending priority need would help young people, stating that 25 per cent of applicants found not in priority need are young people.¹¹² Cymorth Cymru expressed a view that “for people leaving care, this Bill has probably got the most measures within the legislation that will help them”.¹¹³

148. Concerns were raised by local authority representatives that abolishing priority need would be challenging in light of housing supply issues. The WLGA noted that if the test is abolished, this “needs to be at a point where the supply of affordable housing, and the resources available to Councils, have demonstrably increased to levels which allow Councils to fulfil the ambition of the legislation.” They highlighted that ensuring an adequate supply of one bed accommodation,

¹⁰⁸ Local Government and Housing Committee, 19 June 2025, RoP p280

¹⁰⁹ Local Government and Housing Committee, 19 June 2025, RoP p576 & 579

¹¹⁰ Local Government and Housing Committee, 19 June 2025, RoP p581

¹¹¹ Local Government and Housing Committee, 19 June 2025, RoP p587

¹¹² Local Government and Housing Committee, 19 June 2025, RoP p29

¹¹³ Local Government and Housing Committee, 19 June 2025, RoP p341

in particular, to meet the needs of those in temporary accommodation “will provide a very significant challenge in many areas”.¹¹⁴

149. Newport City Council expressed a similar concern, stating that should demand rise further, they would not have the stock of good quality affordable social housing or private rented housing to meet the demand, but acknowledged that “if we had supply to meet demand, it could work brilliantly”.¹¹⁵

150. Pembrokeshire County Council voiced support for abolishing the priority need test, but agreed that resources and funding would be an issue “because there is going to be a greater demand temporary accommodation.”¹¹⁶

151. We heard from Cardiff Council that the priority need test allows local authorities to “prioritise scarce resource for the people who need it most.” They told us that rather than further legislation, the main levers that would make the biggest impact in people’s lives and prevent them from entering the homelessness system are increasing the local housing allowance and increasing housing supply.¹¹⁷

152. Monmouthshire County Council referred to the unlawful operation of waiting lists for temporary accommodation by some local authorities, adding:

*“There are not the resources to meet the current need and it is hard to foresee this situation abating. In these circumstances the absence of priority need would hinder the ability of authorities to ensure that the most vulnerable are accommodated.”*¹¹⁸

153. While Flintshire County Council told us they are “in a good place to be able to respond positively” to abolishing priority need, they added that “clear comms messaging” will be needed “so that we don’t unintentionally create homelessness as a pathway into social housing.”¹¹⁹

154. The Cabinet Secretary acknowledged that changes to priority need in Scotland “did lead to increased demand for temporary accommodation”. A Welsh

¹¹⁴ HSHAWB 52, WLGA

¹¹⁵ Local Government and Housing Committee, 26 June 2025, RoP p76

¹¹⁶ Local Government and Housing Committee, 26 June 2025, RoP p81

¹¹⁷ Local Government and Housing Committee, 26 June 2025, RoP p84 & 86

¹¹⁸ HSHAWB 38, Monmouthshire County Council

¹¹⁹ Local Government and Housing Committee, 26 June 2025, RoP p72-74

Government official added that evidence suggests that the homelessness need in Wales has probably been exposed and that:

“we’re not of the view, and the data doesn’t suggest, that it will bring forward numbers anywhere like it brought forward in Scotland, because we are doing this post pandemic and not before.”¹²⁰

155. In response to whether the provisions on abolishing the priority need test could be implemented earlier than 2031, the Cabinet Secretary told us that it will happen earlier if possible. However, she was “cognisant of the current demands on local authorities” as the “key delivery partner”. She explained that local authorities need time to work towards completely removing priority need and intentionality, therefore the pace and scale of the change needs to be managed.¹²¹

156. In relation to care leavers, we heard from the Cabinet Secretary that the other provisions in the Bill aimed at that group “are likely to have just much more widespread impact” than the changes to priority need.¹²²

Our view

157. We understand that abolishing the priority need test is a key aspect of creating a homelessness system that is trauma informed and therefore welcome the provisions to achieve this. We recognise that only 240 households were found not to be priority need in 2024-25 and that only eight of the 22 local authorities used the test that year, and we welcome the progress that local authorities have already made. Despite this, we appreciate the concerns raised by local authorities and agree with the Cabinet Secretary that they should have enough time to plan for the changes being implemented. While, ideally, we would like to see priority need abolished earlier than 2031, we are supportive of the proposed timescale to enable the planning and culture change to take place. We note the Cabinet Secretary’s assurance that the changes will take place earlier if possible and trust that every effort will be made to that end.

158. The apprehension expressed by care leavers at the prospect of losing their priority need to homelessness services is understandable. We appreciate that the term ‘priority need’ can be misleading for young people as priority need is a binary entitlement test and not a prioritisation test. Nevertheless, it is clear that ending the test could lead to small increases in the numbers entitled to the main

¹²⁰ Local Government and Housing Committee, 4 June 2025, RoP p68 & 70

¹²¹ Local Government and Housing Committee, 18 September 2025, RoP p34-35

¹²² Local Government and Housing Committee, 18 September 2025, RoP p37

rehousing duty in those local authorities that have not already stopped applying it. As such it is crucial that young people are protected from any unintended consequences of the policy change.

159. We recognise the Cabinet Secretary's commitment to ensuring that care leavers do not enter the homelessness system and welcome the other provisions in this Bill aimed at achieving this. Careful sequencing of implementation will be required to ensure that the other provisions are sufficient to mitigate any potential negative impact on care leavers from the abolition of the priority need test. We welcome the Cabinet Secretary's pledge to bring in the allocations provisions early on and we urge the Welsh Government to ensure that reasonable preference for care leavers is established as quickly as possible, to help address fears about ending priority need.

Recommendation 8. The Welsh Government should ensure that the other provisions affecting care leavers are implemented early enough to mitigate any potential negative impact on care leavers from the abolition of the priority need test.

Abolition of the intentionally homeless test

160. Section 10 amends the 2014 Act to remove the intentionality test. The EM states that the intentionality test is "seen as a barrier" to the goal of supporting a person-centred, trauma-informed approach to homelessness. This is because the test excludes homeless people from support and does not take account of the impact trauma can have on behaviour, and can encourage a culture where applicants are categorised as deserving or not deserving of support. The Cabinet Secretary told us:

*"it's important to recognise that the intentionality test is a barrier to ensuring a person-centred inclusive homelessness service. I believe that its removal from law is essential if we want our reforms to end homelessness in Wales."*¹²³

161. A focus group participant expressed their frustrations with the intentionality test:

"If they were in the right provisions, they would not have the intentionality decisions being made against them because services would be structured to manage those needs, but

¹²³ Local Government and Housing Committee, 4 June 2025, RoP p72

unfortunately a lot of people are falling short of those resources and seen as intentionally homeless as a result. We would argue as a service that it's not due to behaviour but due to a lack of adequate provision to meet their needs."

Focus group participant

162. Witnesses were divided on the provisions to remove the intentionality test, with strong opinions voiced on both sides. Most local authority witnesses opposed the provisions, stating that they would create unintended negative consequences, while two local authorities, Flintshire¹²⁴ and Conwy¹²⁵, supported the provisions.

163. Cardiff Council told us they did not support the abolition of the intentionality test and that taking it away "sends a message out to the public that, no matter your behaviour in the private rental sector, you can come into temporary accommodation and be housed".¹²⁶ Pembrokeshire County Council also told us that "the intentionality test really does need to remain" adding that although they agreed with the principle of abolishing the test, "it's not practical at the moment".¹²⁷ Rhondda Cynon Taf CBC told us "it probably just needs a little bit more thought in terms of implementation".¹²⁸

164. We heard concerns from Cardiff Council that, although intentionality decisions are rarely applied, the test "acts as a vehicle to encourage less poor behaviour within the private rental sector."¹²⁹ This was also expressed by most local authorities who responded to our written consultation. The WLGA called for the retention of the test.¹³⁰

165. CIH Cymru also referred to concerns raised by local authorities and stated its view that the intentionality test should remain "albeit in very specific circumstances that are not common occurrences". They would like to see "ongoing application of the test" when:

"There has been extensive criminal behaviour at a property resulting in a police closure order;

¹²⁴ Local Government and Housing Committee, 26 June 2025, RoP p74

¹²⁵ HSHAWB 37, Conwy County Borough Council

¹²⁶ Local Government and Housing Committee, 26 June 2025, RoP p43

¹²⁷ Local Government and Housing Committee, 26 June 2025, RoP p58-64

¹²⁸ Local Government and Housing Committee, 26 June 2025, RoP p66

¹²⁹ Local Government and Housing Committee, 26 June 2025, RoP p43

¹³⁰ HSHAWB 52, WLGA

The applicant was a joint contract holder and has been removed from the property due to a conviction for behaviour that makes them unsuitable to be a tenant;

The applicant has caused significant damage to the property, making it unfit for human habitation.”¹³¹

166. Academics and third sector witnesses argued in favour, although some also voiced concern over the risk of deliberate manipulation penalising some applicants unfairly. Professor Mackie said he was supportive of abolishing the test as there is “a lot of evidence to talk about the detrimental impacts of that piece of law on those households”.¹³² Professor Fitzpatrick also referred to the “very damaging impacts” of the test and that it is often used as a threat in ways in which “are quite inappropriate”. She said:

“I think it is very important that the test is abolished, even though it looks from the statistics like it affects only a very small number of people, but it has this much wider detrimental impact. It’s certainly not a trauma-informed approach.”¹³³

167. To address concerns from local authorities about the removal of the intentionality test, section 36 of the Bill creates a new “deliberate manipulation” test. Section 36, which inserts a new section 167A to the 1996 Act, provides local authorities with a power to remove priority in social housing allocations for a household where a person is trying to deliberately manipulate the housing system to gain advantage when applying for social housing. Section 20 also replaces the ‘unreasonable failure to cooperate’ test with new circumstances in which the duty to help applicants may end. However, the Cabinet Secretary clarified that:

“there’s no replacement of the intentionality test in the Bill—it’s removed completely as a test that determines entitlement to homelessness assistance.”

168. The Cabinet Secretary added:

“there are protections for staff and to the system within the Bill. There are red lines that I don’t think we should accept in any way for our housing workforce in terms of suffering violence or threats or our finite accommodation stock being intentionally

¹³¹ HSHAWB 28, CIH Cymru

¹³² Local Government and Housing Committee, 19 June 2025, RoP p30

¹³³ Local Government and Housing Committee, 19 June 2025, RoP p33

damaged or destroyed. Local authorities will continue to have tools to respond to such unacceptable behaviours. There are safeguards to disincentivise anyone from deliberately making themselves homeless to try and gain priority for social housing.”¹³⁴

169. Local authority representatives did not believe that the new deliberate manipulation test would offer sufficient disincentives and could create unacceptable demands on local authority resources. This is explored further in Chapter 4 of this report under the section on deliberate manipulation.

170. The Cabinet Secretary acknowledged the challenges with this policy area and the “strong opposing views” expressed about the role of the intentionality test. She referred to the test being applied inconsistently across Wales, saying that some local authorities see it as “a tool to manage behaviour” and others as “an exclusionary lever, which disproportionately impacts the most vulnerable people”. The Cabinet Secretary was clear that “the intentionality test should not exist in a trauma-informed homelessness system”, adding:

“I believe that the Bill strikes the right balance, both between individual accountability, delivering a trauma-informed response and providing improved support and multi-agency practice to those who need it.”¹³⁵

Our view

171. We acknowledge that the views expressed on the abolition of the intentionality test were split and that strong views were expressed both in support of and against the provision in the Bill. While only 87 households were formally found intentionally homeless in 2024-25, and 13 local authorities did not find anyone intentionally homeless that year, we recognise that the test is often informally used in discussions with applicants. In recognition that the evidence demonstrated that it is often the most vulnerable people who are penalised by the intentionality test, we therefore on balance, agree that the test should not be part of a trauma informed system. However, we also appreciate the significant concerns raised by local authorities at the prospect of abolishing the test, and given their role in implementing the system, their concerns must be heard.

¹³⁴ Local Government and Housing Committee, 4 June 2025, RoP p73

¹³⁵ Local Government and Housing Committee, 18 September 2025, RoP p40-41

172. It will be crucial to ensure that, if there are unintended consequences of abolishing the test, they are mitigated effectively. Local authorities are genuinely concerned that it will result in a significant increase in the number of applicants entitled to homelessness support and we understand that they need other tools to ensure that people do not make themselves homeless to get priority for social housing.

173. Whilst we realise that a new deliberate manipulation test has been included in the Bill as a tool to encourage positive applicant behaviour in similar ways to intentionality, it is clear that local authorities do not view this as a sufficient alternative disincentive. We understand that the intentionality test is currently applied at the point of assessing an applicant's request for homelessness support, and therefore appreciate why local authorities are concerned about the resource demands of owing an interim accommodation duty to households found to have deliberately manipulated the system. However, we also recognise that most local authorities have already stopped using intentionality formally as part of their trauma-informed approach, which shows that this is already widespread practice. We discuss the manipulation test further in chapter 4.

174. It is clear to us from the evidence that local authorities are feeling significant unease because they do not have many other options to draw upon to deal with problematic behaviour and therefore may fall back on intentionality as a blunt instrument. We recognise local authorities' concerns and we welcome the long lead-in time for implementation that the Welsh Government has set out. During this pre-implementation period, we believe the Welsh Government should do more to ensure that local authorities have other operational tools available. We believe that dedicated resource and support should be provided to local authorities with the aim of increasing the availability of intensive support services for households with the highest level of complex support needs.

175. As local authorities will need new tools to address complex support needs in the absence of the intentionality test, we believe that the Welsh Government has a responsibility to ensure national rollout of effective models of intensive support, requiring local authorities to commission appropriate services.

Conclusion 3. We support the provision to abolish the intentionality test as we agree that it should not be part of a trauma-informed homelessness system. However, we acknowledge that local authorities have significant concerns about this, and believe that ahead of implementation the Welsh Government should work to support all local authorities to prepare by adopting existing good practice in avoiding the formal use of intentionality.

Recommendation 9. The Welsh Government should identify good practice models of intensive support services for households with the highest level of complex need, and should provide the necessary resources and leadership to require these services to be delivered in every local authority where they are needed.

Conclusion 4. While we support ending intentionality to move to a more trauma-informed service, we also understand the concerns of those who worry that deliberate manipulation could be used in similar ways, leading to vulnerable people being unable to access social housing. The Welsh Government should take steps via guidance and training to ensure that deliberate manipulation is implemented in a trauma-informed way.

Local connection referrals

176. Section 11 amends the 2014 Act to remove the requirement for an applicant to have priority need or to be unintentionally homeless in order to be referred to another local authority in Wales or England. It also makes provision for people sentenced to custody to be referred before or during the prevention period. This is intended to support earlier referrals and preventative practice, and to provide clarity in relation to responsibilities to address the needs of those in custody.

177. Focus group participants were critical of arrangements not being in place when someone is released from custody:

“What doesn’t help as well, an age old issue, is that prison always release on Friday. It’s quite often after lunch. It might be in Cardiff, it might be elsewhere. By the time you’ve got back and presented yourself you’ve got staff that are scrambling around at the end of the day trying to find you somewhere. Then the communication breaks down and then you get someone – it’s Friday night, it’s freezing cold, it’s February – and they’re not expecting you.”

“Like, they know when they’re going to release somebody. People aren’t animals.”

Focus group participants

178. Professor Mackie told us he is supportive of having a period of six months to do preparatory work ahead of a person’s release from custody,¹³⁶ while Professor

¹³⁶ Local Government and Housing Committee, 19 June 2025, RoP p77

Fitzpatrick said that although she did not generally favour local connection being applied at prevention stage, “in the case of prisoners it does make sense”.¹³⁷ Support was also voiced by Cymorth Cymru and The Wallich, with both saying that the provisions will benefit people released from custody. The Wallich called for the six month period to “be a minimum term” as “it takes time to build the relationships”.¹³⁸ Crisis said that although the provisions to support prisoners are valuable, “guidance is going to be critical”, particularly to clarify how “you determine six months”.¹³⁹

179. Cardiff Council told us that the provisions will affect them “quite significantly” and raised concern about a “prison’s ability to refer all those prisoners at the right time [] to make that prevention work really meaningful”.¹⁴⁰ Pembrokeshire County Council agreed that it will be important to ensure the earlier conversations and prevention work happen in practice, referring to current legislation and the prisoner pathway “not always working” and “not always being followed”. They emphasised the need for a “really strong memorandum of understanding” with HMPPS.¹⁴¹

180. We heard from HMPPS that the earlier engagement “is really beneficial” and aligns with their resettlement model.¹⁴² Clinks agreed, adding that the early identification allowing for support to be put in place prior to release “will help with the prevention of homelessness”.¹⁴³ Clinks went on to say that the earlier prevention work will need to be properly resourced:

“We need to make sure that there are enough resources within the prisons so that proper support is given.”¹⁴⁴

181. Clinks also identified a potential training need to ensure that resettlement officers in English prisons have an understanding of Welsh housing legislation.¹⁴⁵

182. A Welsh Government official explained that the local connection referral proposed in the Bill means that where a person presents at the wrong local authority, or a local authority becomes aware of a person who does not live in their area, they seek to refer them to the authority for their home area, and that

¹³⁷ Local Government and Housing Committee, 19 June 2025, RoP p91

¹³⁸ Local Government and Housing Committee, 19 June 2025, RoP p351

¹³⁹ Local Government and Housing Committee, 19 June 2025, RoP p467

¹⁴⁰ Local Government and Housing Committee, 26 June 2025, RoP p115

¹⁴¹ Local Government and Housing Committee, 26 June 2025, RoP p117-118

¹⁴² Local Government and Housing Committee, 26 June 2025, RoP p429

¹⁴³ Local Government and Housing Committee, 26 June 2025, RoP p431

¹⁴⁴ Local Government and Housing Committee, 26 June 2025, RoP p460

¹⁴⁵ Local Government and Housing Committee, 26 June 2025, RoP p466

the referral period for prisoners is brought forward to the point where they become subject to the prevention duty, which would be six months prior to their release. The aim of this is that the local authority from which the person should be getting help intervenes from that stage.¹⁴⁶ We heard that the Welsh Government is working with HMPPS and the Ministry of Justice through a post-custody accommodation working group to consider implementation and how practice can be improved, including for prisoners released from Welsh prisons to England and from English prisons to Wales.¹⁴⁷

183. Section 12 empowers Welsh Ministers to make regulations to specify the circumstances in which a person is to be treated as having met the local connection criteria. The current criteria for determining local connection at local authority level will remain the same. The intention of the regulation-making power is to provide more certainty and clarity as to when someone has established a local connection, which is currently set out in guidance.

184. Section 13 inserts a new section into the 2014 Act to retain an exemption from referral for applicants who would be at greater risk of abuse were they to return to the area where they have local connection. The definition of abuse is expanded to incorporate domestic abuse and any other kind of abuse. The section also provides that only one referral under section 80 can be made in relation to the same application, and prevents referral for an applicant in custody who has been notified that a duty is owed to them under section 66 or 75 (and a period of two weeks has passed following this notification).

185. The extended definition was welcomed by Welsh Women's Aid, who described it as "absolutely appropriate".¹⁴⁸

186. Section 14 makes a number of amendments to section 82 of the 2014 Act, which sets out the duties owed by a local housing authority in referral cases under section 80 of that Act. The duties on a local housing authority ("authority A") in new section 82(1A) will apply whether the notified authority ("authority B") is in Wales or England. After notifying authority B, authority A must secure that suitable accommodation is available for the applicant until the applicant is notified of the decision whether the conditions for referral are met, despite authority A's homelessness duties under section 68 and 75 ending. The provision in new section 82(1B) would apply where authority B is in Wales only, and sets out the steps taken once the conditions for referral are met. Similar provision is made for

¹⁴⁶ Local Government and Housing Committee, 18 September 2025, RoP p160-161

¹⁴⁷ Local Government and Housing Committee, 18 September 2025, RoP p163

¹⁴⁸ Local Government and Housing Committee, 19 June 2025, RoP p334

local housing authorities in England, once a referral from a local housing authority in Wales is met, as described in section 14(7). The EM states that “no significant changes have been made to the responsibilities placed on local authorities who are referring applicants”.

187. Section 15 takes account of the abolishing of the priority need and intentionality tests in relation to referrals from England to Wales, with the intention that referrals to a Welsh or an English local authority will operate in the same way.

188. Section 16 amends existing provisions in the 2014 Act which ensure the applicant is notified of why a referral under section 80 has been made, the effect on their ongoing entitlement, and their right to review.

189. Section 17 amends section 85 of the 2014 Act so that the right to request a review of whether or not the conditions for a local connection referral are met is listed separately. It does not make substantive changes to the existing operation.

Our view

190. The release of people from prison into homelessness is a significant concern for us and we are pleased that the Bill seeks to address this by enabling local connection referrals relating to prisoners to take place at an earlier stage. Whilst we welcome this provision, we have some concerns about how effective this will be in reality, in particular the cross-border arrangements.

191. We are also concerned that prisoners released ‘at time served’ could be missed as they may not be on the radar for preventative support, resulting in them being released into homelessness. We would welcome further assurances from the Welsh Government as to how this will be avoided.

192. We acknowledge the Welsh Government official’s comment in relation to the work of post-custody accommodation working group, but note that work to implement provisions on this Bill are on-going. We believe the updates we have recommended be provided by the Welsh Government to the Senedd on progress in implementing provisions should include details of how the working group is preparing to meet the need for earlier local connection referrals.

Conclusion 5. We support the longer period during which local connection referrals relating to prisoners can take place, however we remain concerned as to how effective this will be in reality, especially cross-border. This is an area of concern and we request further information as to how the Welsh Government will

work with the UK Government to implement this. We would also welcome further information as to how this will apply to prisoners released ‘at time served’.

Conclusion 6. We believe that, in providing regular updates to the Senedd on preparations for implementation, the Welsh Government should include details of how the post-custody accommodation working group is progressing its arrangements to meet the need for earlier local connection referrals for prisoners.

193. We welcome the retention of an exemption from referral for applicants who would be at greater risk of abuse were they to return to the area where they have local connection and the expansion of the definition of abuse to incorporate domestic abuse and any other kind of abuse. These are important provisions for vulnerable people.

Further homelessness prevention duties

194. Section 18 places a new duty on local authorities to provide help to retain suitable accommodation that has been secured under homelessness functions. It applies only to individuals for whom homelessness duties have ended, but who are considered by the local housing authority to still be at risk without further support to retain their accommodation.

195. A focus group participant described the kinds of support provided to tenancy to need additional help to live independently:

“I take a lot of referrals for people who, even if they have been housed, they haven’t got the skills to manage a home. It’s that whole life skills stuff and that doesn’t seem to be getting picked up by commissioned services in any way. So when they’re looking at tenancy preparation there might be some very basic stuff done, but there’s not enough being done, particularly around affordability, tenancy skills and getting people actually prepared.”

Focus group participant

196. In its RIA, the Welsh Government has estimated that approximately 10 per cent of households in this category will require additional support under the proposed duty. The section provides that local housing authorities must take reasonable steps likely to achieve the purpose of ensuring that the applicant’s accommodation remains available for them to occupy. It also sets out circumstances in which this duty would come to an end, and creates a right to review of specified decisions in relation to this duty. This new duty is intended to

ensure that support services are provided to applicants to prevent repeat homelessness.

197. Professor Fitzpatrick welcomed the provision for help, but raised concern at the twelve month limit on accessing this. She told us that the Expert Review Panel did not support a cap on the time period as “people can have needs for longer term support”, she said she would like to see an amendment to the Bill to offer flexibility to extend the twelve month limit, or discretion to do so in certain cases.¹⁴⁹ Professor Fitzpatrick described imposing a limit as “a mistake”, fearing that “people might well find themselves back in the statutory homelessness system with all the costs that that incurs”.¹⁵⁰

198. Cymorth Cymru also welcomed the provision, noting that “having the support to help you to maintain that accommodation is absolutely critical”, however they queried whether the ‘duty to help retain’ contained in the Bill differs from ‘a duty to provide support’. Nevertheless, they said the duty is “critical to prevent repeat homelessness” and hailed it as an invest to save measure, as it would likely prove more cost effective than someone going through an eviction process and requiring homelessness support. They too challenged the twelve month time limit, referring to the “arbitrary cap” as “unhelpful” and calling for its removal or flexibility added to enable local authorities to extend the help “in line with need”.¹⁵¹ The Wallich agreed, saying that putting a cap on any support can be harmful as people will worry about the help coming to an end. They added that:

“The Housing First model shows that providing that open-ended support can help people to retain accommodation and they have a safety net, and I think that is imperative.”¹⁵²

199. Witnesses representing Registered Social Landlords (RSLs) also welcomed the provision, but challenged the Welsh Government’s assessment in the RIA that 10 per cent of tenants are in need of such help. Taff Housing believed the estimate was low, stating that the figure was more likely between 50 and 80 per cent.¹⁵³ Tai Tarian also suggested that upwards of 80 per cent of tenants coming through the homelessness system may require support.¹⁵⁴

¹⁴⁹ Local Government and Housing Committee, 19 June 2025, RoP p93

¹⁵⁰ Local Government and Housing Committee, 19 June 2025, RoP p97

¹⁵¹ Local Government and Housing Committee, 19 June 2025, RoP p326-329

¹⁵² Local Government and Housing Committee, 19 June 2025, RoP p331

¹⁵³ Local Government and Housing Committee, 26 June 2025, RoP p297

¹⁵⁴ Local Government and Housing Committee, 26 June 2025, RoP p306

200. Clwyd Alyn also queried whether the twelve month limit is the correct timescale, noting that “some people require ongoing support, and that might be for a very long time”. They said further guidance would be needed on how the decision to end the help will be managed.¹⁵⁵

201. HMPPS described the duty to help sustain a tenancy as “probably one of the most important provisions” in the Bill. They said that, while the probation service engages in tenancy sustainment, having it led by local authorities will “provide an additional safety net and support”.¹⁵⁶

202. Section 19 requires that local housing authorities take reasonable steps to contact applicants who have taken up offers of alternative accommodation under the provisions made in section 7, with a view to identifying whether the applicant is at risk of homelessness and in need of support. The Bill states that local authorities must do this in a two-month window that starts at the end of month five after the main homelessness duty is discharged. It is intended to help reduce repeat homelessness by providing a safeguard for those housed in accommodation that is not a traditional form of social or private rented housing.

203. In response to whether the duty to ‘help’ an applicant to retain accommodation provided for in the Bill differs from the White Paper proposal for a duty to ‘provide support’, the Cabinet Secretary told us that “there’s no practical difference” between the Bill and the White Paper proposal.¹⁵⁷

204. In terms of the proposed timescale for providing help, we heard from the Cabinet Secretary that it is “in line with our White Paper proposals” and “provides assistance to local authorities as they plan with their resources and creates a general end point for the duty”. She noted that it aligns with feedback from stakeholders, “particularly from registered social landlords, who are really clear that the duty’s main effect should be to stabilise the transition into settled accommodation” and that “the 12-month time frame focuses resources where they are needed most”.¹⁵⁸

205. The Cabinet Secretary added that the Bill provides flexibility, that it sets out a range of specified circumstances in which a duty can come to an end, and that the help is also able to continue beyond 12 months, if necessary.¹⁵⁹

¹⁵⁵ Local Government and Housing Committee, 26 June 2025, RoP p300

¹⁵⁶ Local Government and Housing Committee, 26 June 2025, RoP p530

¹⁵⁷ Local Government and Housing Committee, 18 September 2025, RoP p93

¹⁵⁸ Local Government and Housing Committee, 18 September 2025, RoP p95

¹⁵⁹ Local Government and Housing Committee, 18 September 2025, RoP p96

Our view

206. We welcome the duty to provide help to retain suitable accommodation as a key tool in ensuring that someone can sustain a tenancy and therefore preventing repeated episodes of homelessness. We have heard that the help provided by housing support workers is effective and crucial in enabling people to retain their home, and therefore we welcome this provision which will be beneficial in securing stable tenancies for many. The Cabinet Secretary's clarification that there is no practical difference between the duty in the Bill and the White Paper proposal is helpful.

207. Despite supporting the provision, we agree with stakeholders that it should be available to those who need it beyond the twelve months period specified in the Bill. We understand the importance of focusing support on the crucial early stages of a tenancy, and realise that for many people receiving help for a period of twelve months will be enough to enable them to sustain their own home, but feel strongly that for those people still in need of help after that time, the help must still be available.

208. We are pleased by the Cabinet Secretary's assertion that help will be able to continue beyond twelve months but are concerned that this may not be sufficiently clear to stakeholders who called for flexibility on this. We believe that greater clarity is therefore needed and urge the Cabinet Secretary to provide this by specifying this on the face of the Bill. We recognise that this will have resource implications, however if support is not available for the length of time needed, it will be ineffective in helping vulnerable people to secure a long term tenancy, and could lead to further homelessness. This is a critical element of the Bill and we feel strongly that it should be implemented properly in order to be effective.

209. We are concerned that the anticipated cost of providing the help is significantly under-estimated in the RIA, given that that this is based on 10 per cent of households requiring the additional support. We heard from RSLs that their estimation would be between 50 and 80 per cent, which is a significant difference. We are concerned that the Welsh Government's method of using data provided by only three local authorities is insufficient in ascertaining a realistic understanding of the need across Wales and believe that further analysis should be undertaken.

Recommendation 10. The Welsh Government should provide clarity that the duty to help to retain suitable accommodation can be extended beyond twelve months, in line with the recommendations of the Expert Panel, and bring forward an amendment to specify this on the face of the Bill.

Recommendation 11. The Welsh Government should undertake further analysis of the potential need under the duty to provide help to retain suitable accommodation by using figures from a greater number of local authorities and provide a revised estimate of the expected costs ahead of implementing this provision.

Unacceptable behaviour that brings duties to an end

210. Section 20 amends section 79 of the 2014 Act to update the circumstances in which end the duties to help applicants. The provisions replace the existing ‘unreasonable failure to co-operate’ test, which the EM says is too wide in its interpretation and not sufficiently trauma-informed. The Bill provides a narrower test to apply in the following circumstances:

- Applicants who engage in violent or threatening behaviour towards local authority housing staff or other service providers;
- Applicants who intentionally destroy or seriously damage property provided in connection with homelessness accommodation duties; and
- Applicants who deliberately and unreasonably refuse to co-operate – the EM states that this is intended to apply where applicants have failed to respond to repeated attempts by the local authority to make contact.

211. A focus group participant explained how a person’s unmet need for support can be viewed as demonstrating unacceptable behaviour:

“We’re seeing a lot of individuals who have worked intensively with our services and other services, who have really significant complex and multi-faceted needs. But they’re being seen as behavioural issues within B & Bs because the provision provided does not meet the requirements of people with complex needs.”

Focus group participant

212. The Cabinet Secretary told us that “unmet support needs should never be a reason to end support” but “we must ensure that our homelessness staff and other service users are kept safe”. She said there have to be “red lines” to “keep our staff safe”, explaining:

“people who use violence or threats towards staff can have their duties ended, but only if there’s no special circumstance that would make it appropriate for any duty to continue to apply.”

213. The Cabinet Secretary also explained that local authorities will retain the ability to end duties where there is intentional reckless damage to property “if there’s no reasonable excuse for the action taken by the applicant or member of the household, and there are no special circumstances that would require the continuation of the duties”. She added that she expects the provisions to be “used carefully” and:

“where there are special circumstances that have resulted in this behaviour, such as cuckooing, coercion or abuse, local authorities will need to consider other appropriate steps to be taken.”¹⁶⁰

214. A mix of views were expressed by witnesses on the provisions. Professor Mackie said he was supportive of removing the unreasonable failure to co-operate test, but less so of the new provisions to replace it, saying they are “exactly the sorts of behaviours that result from, often, past traumas” including traumatic engagement with public services. He said that “if we pursue those three clauses, [] we’re not then able to end homelessness for those households”.¹⁶¹ Professor Mackie acknowledged that “if somebody continues not to be in contact”, a point is needed whereby all efforts to help are exhausted, but advocated for the removal of the provisions relating to property damage and violent behaviour. He suggested other approaches could deal with those behaviours such as Housing First or intensive supportive accommodation.¹⁶²

215. Cymorth Cymru raised similar concerns that:

“a traumatised person is triggered by something and presents in an emotional state that then ends up with this duty being ended for them.”¹⁶³

216. Crisis cited examples of the existing unreasonable failure to co-operate test being misapplied, and therefore welcomed the narrower provisions in the Bill on not responding to repeated attempts to make contact. However, they raised concern at the introduction of the property damage provision and called for its

¹⁶⁰ Local Government and Housing Committee, 4 June 2025, RoP p97-99

¹⁶¹ Local Government and Housing Committee, 19 June 2025, RoP p39

¹⁶² Local Government and Housing Committee, 19 June 2025, RoP p51-53

¹⁶³ Local Government and Housing Committee, 19 June 2025, RoP p296

removal.¹⁶⁴ G4S Community said they were concerned that the replacement powers could become “intentionality by the backdoor”.¹⁶⁵ Professor Fitzpatrick¹⁶⁶ and Crisis¹⁶⁷ pointed out parallels with other public services such as healthcare, where unacceptable behaviour does not shut people out completely from services.

217. Liz Davies KC suggested that all three circumstances “can be tweaked” and called for a ‘threshold’ to ensure that local authorities only use these powers in situations where they are satisfied there is no other way they can deliver homelessness functions to that applicant.¹⁶⁸ She also called for the Bill to ensure that if duties are ended due to loss of contact, that local authorities do not reject a subsequent application due to no change of circumstances.¹⁶⁹

218. Voices from Care raised concern as to how violent and threatening behaviour will be defined, particularly in the context of neurodivergent young people who may struggle with communication or a young person whose lifestyle may be chaotic, which was a concern echoed by EYHC. Voices from Care told us:

“we do think that more needs to be done around these definitions about under what circumstances, and who will decide, whether somebody isn’t co-operating enough, or is behaving in a threatening manner.”¹⁷⁰

219. Professor Fitzpatrick highlighted a potential unintended consequence of the property damage power. As it would apply to the applicant or someone who resides with them, it could lead to survivors of domestic abuse being excluded from services because of the actions of their partners, Professor Fitzpatrick said “it would be unconscionable if women were affected detrimentally because of the actions of their partners”.¹⁷¹ This concern was echoed by Liz Davies KC¹⁷², Cymorth Cymru¹⁷³, Welsh Women’s Aid, and Crisis¹⁷⁴. Welsh Women’s Aid referred to “many examples of people whose tenancy has been at risk, or ended because of the actions of their partner or ex-partner during their perpetration of abuse”.¹⁷⁵ Voices

¹⁶⁴ Local Government and Housing Committee, 19 June 2025, RoP p424-425

¹⁶⁵ Local Government and Housing Committee, 26 June 2025, RoP p449

¹⁶⁶ Local Government and Housing Committee, 19 June 2025, RoP p42

¹⁶⁷ Local Government and Housing Committee, 19 June 2025, RoP p429

¹⁶⁸¹⁶⁹ Local Government and Housing Committee, 19 June 2025, RoP p182-183

¹⁶⁹ Local Government and Housing Committee, 19 June 2025, RoP p185

¹⁷⁰ Local Government and Housing Committee, 19 June 2025, RoP p594

¹⁷¹ Local Government and Housing Committee, 19 June 2025, RoP p43

¹⁷² Local Government and Housing Committee, 19 June 2025, RoP p184

¹⁷³ Local Government and Housing Committee, 19 June 2025, RoP p297

¹⁷⁴ Local Government and Housing Committee, 19 June 2025, RoP p424

¹⁷⁵ Local Government and Housing Committee, 19 June 2025, RoP p299

from Care also highlighted potential negative impacts on young people targeted by cuckooing, when property may become damaged through the actions of others.¹⁷⁶

220. Several witnesses, including Cymorth Cymru¹⁷⁷ and Crisis,¹⁷⁸ called for strong guidance to ensure the powers are used in trauma-informed ways.

221. A different perspective was expressed by local authority representatives. The WLGA argued for keeping the unreasonable failure to cooperate test in its current form, saying that limiting its use may reduce personal responsibility and “may also lead to applicants feeling less compelled to take ownership of finding solutions to their housing circumstances”. The WLGA called for “a more robust commitment to working together collaboratively to phase in this change by 2030 or later”, to enable a collective effort to increase supply and resources.¹⁷⁹

222. Several stakeholders, including Swansea Council¹⁸⁰, Monmouthshire County Council¹⁸¹, CIH Cymru¹⁸² and CHC,¹⁸³ expressed support for extending the powers to include violence towards other residents. Swansea Council also called for the powers to be extended to include non-payment of rent or service charges in temporary accommodation.¹⁸⁴

223. Monmouthshire County Council highlighted the need for clear guidance as to what constitutes violent and threatening conduct to ensure consistent application across Wales.¹⁸⁵

224. In response to the concerns raised by stakeholders that survivors of domestic abuse may be adversely affected by the provision, the Cabinet Secretary told us that the risk of the provision being misapplied was considered through the drafting process, and is “reflected in the careful wording of the provisions”. She explained:

“duties can only be ended where there’s no reasonable excuse for the actions taken by the applicant or member of their household, and that there are no special circumstances that

¹⁷⁶ Local Government and Housing Committee, 19 June 2025, RoP p593

¹⁷⁷ Local Government and Housing Committee, 19 June 2025, RoP p296

¹⁷⁸ Local Government and Housing Committee, 19 June 2025, RoP p425

¹⁷⁹ HSHAWB 52, WLGA

¹⁸⁰ HSHAWB 44, Swansea Council

¹⁸¹ HSHAWB 38, Monmouthshire County Council

¹⁸² HSHAWB 28, CIH Cymru

¹⁸³ Local Government and Housing Committee, 26 June 2025, RoP p269

¹⁸⁴ HSHAWB 44, Swansea Council

¹⁸⁵ HSHAWB 38, Monmouthshire County Council

would require the continuation of the duties. Those safeguards have been specifically inserted to just make sure that victims of interpersonal or familial violence, or those at risk of exploitation are not mistakenly affected. In cases of domestic abuse or cuckooing, action should be taken against the perpetrator and duties should not be ended.”¹⁸⁶

Our view

225. We understand the need for local authorities to have effective tools in order to respond to unacceptable behaviour by people in receipt of homelessness support, in particular when a person is engaging in anti-social or threatening behaviour towards staff. Staff must be protected and it is right that approaches be in place to tackle this. However, we recognise that people behaving in an unacceptable manner often do so as a result of trauma they have experienced themselves. We are therefore concerned that ending a duty to help such a person may not be an appropriate solution, especially if that person then becomes hidden homeless, an outcome that would undermine the policy objective of ending homelessness. We agree with stakeholders that strong guidance will be needed to ensure that the power is used in trauma-informed ways and that other existing measures, including under criminal law if necessary, are taken first. We reiterate our earlier point that local authorities are poorly equipped to handle complex unmet needs and that there needs to be greater provision of specialist intensive support services.

226. We sympathise with the analogy made by some stakeholders that a person behaving in a manner deemed unacceptable in a health setting would not be refused medical treatment and can see some comparison. We do not underestimate the challenges of such a situation, but are concerned that penalising someone who could be vulnerable themselves will lead to further trauma. We therefore believe that options for further support should be put in place and exhausted before the drastic move to end a duty to help is taken, and only if the local authority is confident that there is no other way they could assist the person.

227. We heard calls for the provision to apply when violent or threatening behaviour is targeted towards other residents in addition to housing sector staff and we understand the rationale for this. Residents should not be subjected to anti-social behaviour and it is important for their wellbeing that authorities have

¹⁸⁶ Local Government and Housing Committee, 18 September 2025, RoP p56

appropriate tools to respond and can put safeguards in place that offer protection. Again, we do not believe that ending a duty and risking a person becoming homeless is a sustainable solution.

Conclusion 7. We are concerned that ending a duty to provide homelessness support is a drastic step and believe that options for providing further support should be put in place before such action is taken as a last resort. The Welsh Government should amend the Bill to clarify that duties can only be ended for unacceptable behaviour if the local authority is satisfied that there is no other way they can deliver homelessness functions to that applicant.

228. We were particularly concerned to hear evidence suggesting that survivors of abuse could potentially find themselves being penalised and have their duty ended as a result of the behaviour of a person who resides with them. We welcome the Cabinet Secretary's assertion that duties can only be ended where there is no reasonable excuse for the behaviour and that in cases of domestic abuse or cuckooing, duties should not be ended. We hope this confirmation provides reassurance, but we emphasise the importance of this being enforced properly and consistently. The guidance on this must be unequivocal that survivors of abuse should not have their duties ended as a result of the unacceptable behaviour of an abusive person residing with them.

Conclusion 8. The guidance on unacceptable behaviour that brings duties to an end must be strong and emphasise that survivors of abuse must not have their duties ended as a result of the unacceptable behaviour of an abusive person residing with them.

Duty to ask and act

229. Section 21 inserts two new sections to the 2014 Act (sections 94A and 94B) to create a new duty on specified public authorities to identify where individuals may be homeless or at risk of homelessness, and then seek their consent to make a referral to the local housing authority on their behalf. This is referred to as the 'ask and act' duty. The Expert Review Panel had recommended a duty to 'identify, act and refer'. The EM refers to the decision to use 'ask and act' as borrowing a title used to describe very similar practice related to violence against women, domestic abuse and sexual violence (VAWDASV) in Wales, it notes:

"We see benefits in sharing the title as many of the specified public bodies named in the Bill are familiar with practice of this kind and learning can be taken from roll out of "ask and act" for VAWDASV."

230. The specified authorities would also be required to provide information about other sources of help, and consider whether they could reasonably take any other steps to help the individual secure or retain accommodation.

231. The Bill specifies that the duty would apply to the following public authorities:

- a social services authority;
- a Local Health Board, but only in relation to individuals to whom it provides or arranges health care services that are not primary care services;
- the Welsh Ambulance Services University National Health Service Trust;
- a registered social landlord;
- a new town corporation for an area in Wales;
- a private registered provider of social housing that provides housing in Wales;
- a housing action trust for an area in Wales;
- the governor of a prison in Wales;
- the director of a contracted out prison in Wales;
- the governor of a young offender institution in Wales;
- the governor of a secure training centre in Wales;
- the director of a contracted out secure training centre in Wales;
- the principal of a secure college in Wales;
- a youth offending team established under section 39(1) of the Crime and Disorder Act 1998 (c. 37) for an area in Wales ;
- the manager of a secure children's home in Wales;
- a provider of probation services in Wales;
- an officer employed by the Secretary of State at an office in Wales known as a Jobcentre Plus office;

- the Secretary of State for Defence, but only in relation to members of the regular armed forces of the Crown.

232. The Bill provides a power for Welsh Ministers to amend the list. The EM says that the Welsh Government expects the list to grow over time.

233. Section 22 amends the 1996 Act so that specified public bodies already subject to a similar ‘duty to refer’ in England will also refer a person to Wales where the person specifies a local housing authority in Wales and consents to being referred.

234. Dr Ayla Cosh told us that ‘ask and act’ is already happening “on a small level” in Cardiff, explaining that the Cardiff and Vale Health Inclusion Service (CAVHIS) and Cardiff Council have worked together to create a system where if individuals are identified in the emergency unit, secondary care or community services, they can be directly referred to front-line housing services. Dr Cosh explained that this is done using Microsoft Forms.¹⁸⁷ She said that legislating for the duty will help to roll out the approach across Wales.¹⁸⁸

235. Most witnesses welcomed the ‘ask and act’ duty. Cymorth called it a “game changer”¹⁸⁹, while Crisis noted that the organisations that are listed “will make a huge difference”.¹⁹⁰ CHC were supportive of the duty, saying that “residential social landlords do this day in, day out”,¹⁹¹ but noted concern at RSLs being included on a list of organisations referred to as ‘public authorities’. They called for the Bill to refer to “listed authorities” given RSLs’ status as independent organisations.¹⁹²

236. Differing views were expressed by some stakeholders on the wording of the provisions. Professor Mackie called for the Bill to use the language recommended by the Expert Review Panel and refer to ‘identify’ and act, rather than ask. He said this language was more proactive and would encourage public bodies to seek to identify potential homelessness through methods such as data analysis, rather than just asking select service users.¹⁹³ Cymorth Cymru¹⁹⁴ and Dr Cosh agreed that the wording could be clearer about identifying when someone is at risk.¹⁹⁵

¹⁸⁷ Local Government and Housing Committee, 26 June 2025, RoP p387

¹⁸⁸ Local Government and Housing Committee, 26 June 2025, RoP p390

¹⁸⁹ Local Government and Housing Committee, 19 June 2025, RoP p363

¹⁹⁰ Local Government and Housing Committee, 19 June 2025, RoP p485

¹⁹¹ Local Government and Housing Committee, 26 June 2025, RoP p320

¹⁹² Local Government and Housing Committee, 26 June 2025, RoP p236

¹⁹³ Local Government and Housing Committee, 19 June 2025, RoP p122-123

¹⁹⁴ Local Government and Housing Committee, 19 June 2025, RoP p365

¹⁹⁵ Local Government and Housing Committee, 26 June 2025, RoP p391

237. Liz Davies KC felt that the duty is worded robustly already, saying that ‘ask’ is “positive” and that having a record that a person has been asked to give their consent to make an application is important. She noted, however, that the phrasing used in new section 94A(1) ‘considers that a person in Wales in relation to whom the authority exercises functions is or may be homeless’ is inconsistent with the 2014 Act. Her suggestion, for consistency, was that the wording should be “where the public authority has reason to believe that a person may be homeless”, to reflect terminology more commonly used in housing legislation.¹⁹⁶

238. Referring to the existing ‘ask and act’ duty in relation to VAWDASV legislation, Welsh Women’s Aid told us that it does work for VAWDASV as long as agencies have the right funding, tools and knowledge to be able to ask and respond appropriately and know where they can access support for those people. Although they were supportive of the approach, they raised concern that using the same term could potentially lead to confusion with the VAWDASV duty.¹⁹⁷ Cymorth Cymru acknowledged that using similar language could help bodies understand the principle of the duty and help them to “embrace it more wholeheartedly” but supported the need to avoid confusion with the VAWDASV duty.¹⁹⁸

239. In written evidence, Cwm Taf Morgannwg University Health Board (UHB) said that identification of homelessness risk can be built into their processes across district general hospitals, community hospitals, community-based teams and mental health in-patient provision. They called for effective training and awareness programmes for relevant staff, and “an increase in Housing Support Grant aimed at keeping people in their home”. Their evidence stated that they planned to amend the D2RA discharge policy to include provision for patients’ housing situations to be considered at the point of admission, allowing additional time for preventative action.¹⁹⁹

240. On implementation, the importance of training for staff subject to the duty was raised by Crash Wigley and Shelter Cymru who said it will require “a decent amount of resource invested by the Welsh Government.”²⁰⁰ The GMB said there needs to be a structured process and training for staff subject to the duty.²⁰¹ Cymorth Cymru suggested it would be useful to explore whether there could be greater clarity on the face of the Bill and in guidance on the training, learning, the

¹⁹⁶ Local Government and Housing Committee, 19 June 2025, RoP p237-239

¹⁹⁷ Local Government and Housing Committee, 19 June 2025, RoP p359-361

¹⁹⁸ Local Government and Housing Committee, 19 June 2025, RoP p364

¹⁹⁹ HSHAWB 48, Cwm Taf Morgannwg University Health Board

²⁰⁰ Local Government and Housing Committee, 19 June 2025, RoP p234-235

²⁰¹ Local Government and Housing Committee, 26 June 2025, RoP p570

development and resourcing.²⁰² Rhondda Cynon Taf CBC also emphasised the need for “strong guidance” to ensure consistency and continuation when people move to new roles.²⁰³

241. On training, Dr Cosh said that in her experience “a mandatory training module is really important” along with a single point of contact in hospitals where staff can refer individuals at risk who can liaise with the local authority and an “IT solution to make the process as smooth as possible”.²⁰⁴ A similar view was expressed by Clinks in relation to referrals from the prison and probation services, including the need for clear pathways that “actually lead to action”.²⁰⁵

242. Dr Cosh argued for better data sharing and improvements to IT systems, to prevent duplication of work across agencies and enable better measurement of outcomes.²⁰⁶

243. In response to the suggestion that the duty should be worded differently, the Cabinet Secretary noted in her letter to the Legislation, Justice and Constitution Committee:

“I do not believe that there would be a significant difference in meaning had we used “has reason to believe” instead of “considers”. The reason for using “considers” in this provision is for consistency with the language of section 213B of the Housing Act 1996, as (broadly) the same bodies will be subject to the duty to “ask and act” under new section 94A of the 2014 Act in relation to Wales and the duty to refer under section 213B of the Housing Act 1996 (“the 1996 Act”) in relation to England. There is, therefore, value in using the same language in both provisions.”

244. As to whether the Bill should specify that public bodies should be required to take proactive steps to identify homeless risk and set out steps to achieve this, the Cabinet Secretary acknowledged that professionals “must be sufficiently equipped to identify signs of homelessness or risk of homelessness” and that there is work to do to ensure this is done ahead of implementation. However, she added:

²⁰² Local Government and Housing Committee, 19 June 2025, RoP p365

²⁰³ Local Government and Housing Committee, 26 June 2025, RoP p127

²⁰⁴ Local Government and Housing Committee, 26 June 2025, RoP p407

²⁰⁵ Local Government and Housing Committee, 26 June 2025, RoP p490

²⁰⁶ Local Government and Housing Committee, 26 June 2025, RoP p396-397

*"I don't believe it's appropriate to list a specific question or specific steps on the face of the Bill, just because it'll not fit the needs of all individuals, and I really don't want to create a tick-box exercise for homelessness. I don't think that that would lead to the effective person-centred response that I'm sure we all want to see. I think to help public bodies deliver 'ask and act', the duty has to be supported by detailed statutory guidance and a learning and development offer, and I'm very much of the view that those tools are more effective in setting out the detailed practical proposals needed to deliver 'ask and act'."*²⁰⁷

Public bodies not specified in the Bill

245. The Cabinet Secretary explained that while the duty would apply to local health boards – including urgent and emergency care, in-patient care, mental health and substance misuse services, a different decision has been taken in relation to primary care:

*"Primary care is not included because the Welsh Government has a different, contractual based relationship with the sector. So, in discussions that officials had with health policy colleagues, I've determined that our policy intention is much better met through contract renegotiation and service specification for GP services."*²⁰⁸

246. A Welsh Government official added:

*"we're trying to achieve the same outcome through that contract renegotiation. How exactly that will be phrased and developed within that, we're still working with health colleagues on at the moment. But, yes, we're trying to achieve the same outcome as the 'ask and act' duty, but through a different mechanism with primary care."*²⁰⁹

247. The Cabinet Secretary and her officials also set out the Welsh Government's position on not including the police among the specified public bodies, with the Cabinet Secretary noting that the Welsh Government is in discussions with the UK

²⁰⁷ Local Government and Housing Committee, 18 September 2025, RoP p121

²⁰⁸ Local Government and Housing Committee, 4 June 2025, RoP p102

²⁰⁹ Local Government and Housing Committee, 4 June 2025, RoP p110

Government on this.²¹⁰ An official explained that police officers carry an individual duty which is different to other public sector officers specified in the Bill, therefore the drafting implications had not been “completely worked through”. The official also said that a further complication would be “asking the police in Wales to do something that the police in England are not doing”, despite there being a similar duty in England. The official said that the Welsh Government hopes to bring forward amendments at a later stage.²¹¹ Another official clarified that adding the police to the list of specified bodies would require Minister of the Crown consent as policing is not devolved.²¹²

248. The list of specified bodies does not include schools and colleges despite their inclusion being recommended by the Expert Review Panel. The Cabinet Secretary explained the reasons for their omission:

“Extensive engagement was undertaken with schools and education unions as part of the workload assessment process to determine the most appropriate approach in respect of education. Following that engagement, I agreed with the Cabinet Secretary for Education that the duty to ‘ask and act’ will not apply to schools at this time, but will instead strengthen existing support systems and guidance using our existing powers. Schools will continue to have a role to play in homelessness prevention, and it is important to build on the systems that we’ve already got in place to support children and families.”²¹³

249. Although the list of public bodies subject to the ask and act duty was welcomed by many, we heard calls for other bodies to be included on the list. Both Professor Mackie and Professor Fitzpatrick expressed disappointment at the exclusion of primary care from the list, with Professor Fitzpatrick noting that it is “one of the most important community-based services that people at risk of homelessness are very likely to come into contact with”. Both also expressed disappointment at the omission of schools from the duty.²¹⁴

250. Several other witnesses echoed calls for the inclusion of primary care, including Dr Cosh who said that as primary care “see the majority of people who are at risk of homelessness”, making those services subject to ask and act duties is

²¹⁰ Local Government and Housing Committee, 4 June 2025, RoP p114

²¹¹ Local Government and Housing Committee, 4 June 2025, RoP p116-123

²¹² Local Government and Housing Committee, 4 June 2025, RoP p129

²¹³ Local Government and Housing Committee, 4 June 2025, RoP p148

²¹⁴ Local Government and Housing Committee, 19 June 2025, RoP p131 & 134

“the key to unlocking the prevention part of this duty”.²¹⁵ Cymorth Cymru questioned whether using the GP contract, thereby “relying on service specifications that haven’t been resolved yet”, gives sufficient confidence that “the ambition and outcomes of ‘ask and act’ will be replicated” in the same way.²¹⁶ Other witnesses supportive of primary care being included Crisis²¹⁷, Newport City Council²¹⁸ and Rhondda Cynon Taf councils²¹⁹, CHC²²⁰, EYHC and Cwm Taf Morgannwg UHB²²¹.

251. In relation to including the education sector, Cymorth Cymru understood the rationale for not putting a duty on headteachers and principals, but instead called for a legal duty on local education authorities.²²² This suggestion was supported by the GMB.²²³

252. Stakeholders representing young people unanimously called for the education sector to be included within the duty, with Voices from Care noting that it is “the public service where nearly all children and all young people have a connection with on a daily basis”.²²⁴ This was echoed by GISDA who said the sector is “a key link for identifying young people who are at risk of homelessness early on, earlier than any other institution”.²²⁵ EYHC concurred, adding that “as conversations are going to be happening in school anyway”, having a protocol for teachers to support the young people would be “a far more effective use of people’s time”.²²⁶ Other witnesses supportive of education being included were Newport City Council,²²⁷ Crisis,²²⁸ and G4S Community²²⁹. EYHC and the NYAS also called for youth workers to be included.²³⁰

253. In addition to calling for the inclusion of primary care and schools, Shelter Cymru told us they would also like to see the police included as they are often present at evictions. They said that having a duty on the police to refer “would be

²¹⁵ Local Government and Housing Committee, 26 June 2025, RoP p401-403

²¹⁶ Local Government and Housing Committee, 19 June 2025, RoP p366

²¹⁷ Local Government and Housing Committee, 19 June 2025, RoP p485

²¹⁸ Local Government and Housing Committee, 26 June 2025, RoP p107

²¹⁹ Local Government and Housing Committee, 26 June 2025, RoP p127

²²⁰ Local Government and Housing Committee, 26 June 2025, RoP p321

²²¹ HSHAWB 48, Cwm Taf Morgannwg University Health Board

²²² Local Government and Housing Committee, 19 June 2025, RoP p367

²²³ Local Government and Housing Committee, 26 June 2025, RoP p489

²²⁴ Local Government and Housing Committee, 19 June 2025, RoP p562

²²⁵ Local Government and Housing Committee, 19 June 2025, RoP p564

²²⁶ Local Government and Housing Committee, 19 June 2025, RoP p568

²²⁷ Local Government and Housing Committee, 26 June 2025, RoP p107

²²⁸ Local Government and Housing Committee, 19 June 2025, RoP p485

²²⁹ Local Government and Housing Committee, 26 June 2025, RoP p321

²³⁰ Local Government and Housing Committee, 19 June 2025, RoP p569 & 572

a really powerful duty that then they'd have to act on".²³¹ This was a view shared by others including Cymorth Cymru,²³² G4S Community²³³ and Clinks who said it was "a missed opportunity" as police are often the first point of contact for vulnerable people at risk of homelessness. Clinks told us that excluding the police "risks creating gaps in provision".²³⁴

254. Some witnesses, including Professor Fitzpatrick,²³⁵ the Welsh Refugee Council,²³⁶ and Housing Justice Cymru²³⁷ expressed disappointment that the Home Office is not included, in relation to people newly granted refugee status. The Bevan Foundation recommended that the Welsh Government call on the Home Office to increase the notice period for newly granted refugees beyond 56 days.²³⁸

255. Witnesses generally welcomed that the Bill makes provision for the list to be extended in future.

256. The Cabinet Secretary told us that she has considered adding local education authorities to the list of bodies subject to 'ask and act' but did not believe it necessary or that it would achieve the policy intention. She explained that local authorities already have duties under the Education Act 2002 to "make arrangements to ensure that their education functions are exercised with a view to safeguarding and promoting the welfare of children this existing duty to promote the welfare of children" which she believes "covers the arrangements for children at risk of homelessness already". The Cabinet Secretary added she does not want to duplicate work and will focus on building good practice and updating existing or issuing new guidance.²³⁹

257. A Welsh Government official added that the legislative framework within education already exists and can be "hooked into" and strengthened through focusing on ensuring that the right pathways and referral routes are in place.²⁴⁰

258. In response to progressing discussions with the Home Office in relation to including the police under the duty, the Cabinet Secretary told us that she is "in

²³¹ Local Government and Housing Committee, 19 June 2025, RoP p228

²³² Local Government and Housing Committee, 19 June 2025, RoP p368

²³³ Local Government and Housing Committee, 26 June 2025, RoP p499

²³⁴ Local Government and Housing Committee, 26 June 2025, RoP p497

²³⁵ Local Government and Housing Committee, 19 June 2025, RoP p136

²³⁶ Local Government and Housing Committee, 19 June 2025, RoP p495

²³⁷ HSHAWB 42, Housing Justice Cymru

²³⁸ HSHAWB 45, Bevan Foundation

²³⁹ Local Government and Housing Committee, 18 September 2025, RoP p124-124

²⁴⁰ Local Government and Housing Committee, 18 September 2025, RoP p134

correspondence with Home Office Ministers” and is “planning to meet them to discuss the potential role of the police”. She did not want to “prejudice the outcome of those discussions” but committed to providing an update when able.

259. The Cabinet Secretary told us that contact has also been made with the Home Office in relation to refugees and that “UK Government officials have been very clear from the beginning of our discussions that they’re not in a position to support the inclusion of asylum services within ‘ask and act’”. We heard that as an alternative approach, as the contract for asylum housing in the UK requires the provider to inform a local authority when it ceases support for a service user following a positive decision about their asylum application, “what that means in practice is that local authorities are made aware of people who need support, which is what the duty to ‘ask and act’ seeks to achieve.”²⁴¹

Our view

260. We support the inclusion of the ‘ask and act’ provisions in this Bill and recognise the general support for the duty expressed by stakeholders. We heard that a similar duty already exists in relation to identifying people at risk of VAWDASV, which works well. We acknowledge concern that using the same terminology may cause confusion, however on balance, as many of the same organisations will be subject to both duties, we agree that the familiarity may be of benefit to professionals in understanding the concept of the new duty quickly, helping to embed it in practice.

261. We also acknowledge the evidence from CAVHIS where the concept is already happening in part. We welcome this work, which will provide valuable evidence in preparation for rolling the duty out across Wales. Implementing the duty effectively will require input from all of the bodies involved. Any system used must be designed to meet the needs of all parties and must be straightforward to administer. We heard from CAVHIS that they use software which is easy to use. The CAVHIS experience and the input of other bodies must be at the forefront of implementation.

Conclusion 9. Training for professionals and training packages will be essential in terms of being able to identify the signs of homelessness and in how to respond. We note from the implementation timescale cited by the Cabinet Secretary that the duty is due to commence as part of the second phase in 2028-29, and while there is significant time to plan ahead, this time must be spent wisely.

²⁴¹ Local Government and Housing Committee, 18 September 2025, RoP p142-143

Conclusion 10. Effective implementation will be key to the success of the ‘ask and act’ provisions and stakeholders must be involved in designing a system that works for everyone. The CAVHIS experience and the input of other bodies must be at the forefront of planning for implementation.

262. We welcome the range of organisations already listed in the Bill and support their inclusion as all have an important role to play in identifying someone who is or may be homeless or threatened with homelessness. Clarity in governance will be essential to ensure that it is clear within each public body who is responsible for embedding new processes and ensuring training is delivered. We particularly welcome the inclusion of governors of prison and young offender institutions given the high risk of homelessness among people released from prison. The provision to amend the list through secondary legislation is crucial and we support its inclusion.

263. Despite our general support for the duty, we are very mindful of the calls made by stakeholders for changes to the wording or to the list of bodies to whom the duty would apply. We discussed the wording of the duty with the Cabinet Secretary who thought it was sufficiently clear. We appreciate that this duty is a new concept in the Welsh homelessness sector, with only one similar approach in place. It will therefore be crucial to monitor its impact and make changes to it if needed. We therefore believe that a formal review of the duty will be needed and that this should be provided for on the face of the Bill.

Recommendation 12. The Welsh Government should bring forward an amendment to provide for a formal review of the impact of the ‘ask and act’ duty introduced by section 21. A review should include how the duty is working for the public bodies listed in preventing homelessness and the position in relation to those not listed, monitoring of these sectors, and consideration of whether changes need to be made to the list.

264. The evidence we heard was convincing and we are sympathetic to those calls for adding bodies to the list, in particular the education sector, primary care and the police, all of whom are in positions to recognise signs of homelessness and identify people at risk.

265. Teachers and other school staff interact with children on a daily basis and given the relationships they are able to build with young people and their families, we are surprised that they have not been included within the ‘ask and act’ provisions. It was clear that most of the stakeholders we heard from had also expected their inclusion. We discussed this at length with the Cabinet Secretary and heard her rationale for opting for a different approach. We understand that

separate arrangements are already in place within schools for identifying young people at risk of homelessness and seeking appropriate support, which we were told is effective. Having given this serious consideration, we accept the Cabinet Secretary's reasoning against subjecting schools to the 'ask and act' duty at this stage if an effective alternative is already in place. Despite this, given the strength of the evidence in support of including schools, we believe that the effectiveness of the existing arrangement should be carefully monitored with a view to adding schools to those subject to the duty if needed.

266. We also heard the Cabinet Secretary emphasise the importance of focusing on strong guidance and sharing good practice. We agree that these will be key. But a common theme in our housing scrutiny is that the sharing of good practice does not always happen as it should and feel that this could be a weakness of this approach. We believe that the Welsh Government should set out how it expects this to happen in how schools identify and notify local authorities of homelessness risk, including its own role in disseminating information.

Recommendation 13. The Welsh Government should set out how it expects good practice to be adopted consistently in how schools identify and notify local authorities of homelessness risk, including its own role in disseminating information.

267. We are also surprised that primary care providers have not been captured within the 'ask and act' duties given the interactions practitioners have with their patients. Again, the evidence we heard from stakeholders strongly favoured this inclusion. In particular, the call from CAVHIS for this was compelling given their experience in piloting 'ask and act'. We are unconvinced by the Cabinet Secretary's rationale for not including primary care in the Bill but attempting to achieve the same outcome through contract renegotiation and service specification for GP services.

268. We note from the implementation timescale cited by the Cabinet Secretary that the duty is due to commence as part of the second phase in 2028-29. During the intervening period, the Welsh Government should progress with its aim of using contract negotiations and GP service specification to confer upon primary care a requirement to identify people at risk of homelessness and refer them for support. If this is not possible, or if this alternative approach is less effective, the Welsh Government should bring forward secondary legislation to add primary care to the list of public bodies listed under section 21 of the Bill.

Recommendation 14. In light of the strong evidence in support of including schools and primary care on the list of public bodies subject to the 'ask and act'

duty, the Welsh Government should monitor the effectiveness of its alternative approaches with a view to adding these sectors to the duty if necessary, using the power to amend the list through secondary legislation.

269. We acknowledge that the Cabinet Secretary is continuing discussions with the Home Office in relation to including the police within the list of bodies subject to the ‘ask and act’ duty, which we welcome. The police are on the front line every day, interacting with people including those sleeping rough, they are also often in attendance at evictions and will see first hand people having to leave their homes. We appreciate the challenges associated with including the police under the duty, including obtaining Minister of the Crown consent, but this is vital.

270. We heard a Welsh Government official say that they hope to bring forward amendments at a later stage, which we welcome. We appreciate the Cabinet Secretary’s commitment to providing an update on discussions with the Home Office and we ask that an update be provided during the debate on the general principles of the Bill.

Provision for vulnerable people

271. The Bill includes a number of specific provisions aimed at groups of vulnerable people.

Young people leaving care

272. Section 23 amends the Social Services and Well-being (Wales) Act 2014 (“the SSWB Act 2014”) with the aim of ensuring that no young person leaving care has to present as homeless to access suitable accommodation. The amendment places a new duty on local authorities to take reasonable steps to secure that suitable accommodation is available for occupation by a young person leaving care who is aged between 18 and 21, or up to the age of 25 where the young person is in education or training. The proposal is supported by provision in section 37 which aims to prioritise young people leaving care in social housing allocations, by creating a new category of reasonable preference for young people owed this new duty.

273. The Bill provides a regulation-making power to Welsh Ministers to define the meaning of “suitable accommodation” in relation to young people leaving care.

274. Section 24 places a new duty on local authorities to make arrangements which include a joint protocol between social services and housing functions. The intention is that protocols will set out arrangements for providing services centred

on young people and their families. The EM says that the Welsh Government expects children's social services to be the lead agency in most cases.

275. The categories of young persons which the duty will apply to are consistent with the definitions of categories of young persons already entitled to support under sections 105 to 115 of the SSWB Act 2014. In her letter to us on 20 June, the Cabinet Secretary set out how the provisions apply to the various categories of young people, as defined by the SSWB Act 2014:

"The new section 108A introduces two duties on responsible local authorities concerning care leavers, as defined under the Social Services and Well-being (Wales) Act 2014, to (where their well-being requires it) take reasonable steps to ensure suitable accommodation is available to them. The first duty applies to young people in categories 1 and 2 when they turn 18 and become category 3 care leavers. The duty in those cases applies until they turn 21 but this duty may extend beyond age 21 if they remain in education or training. For categories 5 and 6, this first duty applies from 18 to 21.

The second duty applies to categories 3 and 4, and in certain cases for category 5 and 6 young people for a period of 12 months (or longer if the person's well-being requires it) following the end of their respective duties under the Act. The duties under the Act could extend beyond age 25 where the individual is pursuing, or intends to pursue, education or training."

276. The provisions were generally welcomed by stakeholders representing young people leaving care but NYAS called for clear communication to ensure that the children and young people know and understand their rights and for the workforce supporting them.²⁴² Voices from Care highlighted the need for a clear definition of 'reasonable' in the context of the duties on local authorities in the new section 108A(2) and (4).²⁴³

277. Voices from Care and EYHC welcomed the joint protocols with social services but called for the Welsh Government to mandate good practice in communication between social services and homelessness services with a

²⁴² Local Government and Housing Committee, 19 June 2025, RoP p526

²⁴³ Local Government and Housing Committee, 19 June 2025, RoP p543

national protocol template.²⁴⁴ EYHC referred to an existing example in Carmarthenshire of “a joint team already established with joint working protocols from social workers, housing options advisers and youth homeless co-ordinators” which is “working really well” and the results have been “fantastic”. They told us:

“The Welsh Government have viewed this as a piece of best practice already, so it would be really pleasing to see the Welsh Government take more leadership on that protocol and really dictate what they want from local authorities to make sure that it’s not a continuation of where the good local authorities continue to do stuff positively and where, maybe, there are issues in some local authorities and that those issues continue regardless of the legislation.”²⁴⁵

278. Voices from Care also said that these new functions should be overseen by the inspectorates and that young people should be consulted as part of the process of inspecting those services²⁴⁶.

279. In relation to the provisions applying to care leavers until the age of 21 or 25 if they are in education or training, NYAS called for the Bill or guidance to ensure support can still be accessed after a person turns 21, noting that “the risk of homelessness does not stop for a care leaver when they turn 21”.²⁴⁷

280. The Children’s Commissioner for Wales was “pleased to see that this group of young people are now considered eligible for enhanced support and subsequent bypassing of the homelessness system” but raised concern at the duties in section 23 referring to ‘young people whose well-being requires it’. The Commissioner noted that “care-experienced young people may feel pressure or a need to prove that they have ‘bad enough’ well-being to be considered a priority for suitable accommodation.”

281. The Commissioner welcomed the protocol for handling cases involving care leavers under section 24, stating that requiring local housing authorities to establish such co-operation arrangements will “result in care-leavers effectively bypassing the homelessness system and avoiding further negative experiences of systems and public bodies.”

²⁴⁴ Local Government and Housing Committee, 19 June 2025, RoP p531

²⁴⁵ Local Government and Housing Committee, 19 June 2025, RoP p535

²⁴⁶ Local Government and Housing Committee, 19 June 2025, RoP p532

²⁴⁷ Local Government and Housing Committee, 19 June 2025, RoP p537

282. Action for Children called for “more explicit guidance from Welsh Government that the protocol should adopt a multi-agency approach in the cases of care leavers at risk of homelessness” and for reference to be made to the voluntary sector in section 24.²⁴⁸

283. Other stakeholders also supported the provisions, with Cymorth Cymru saying that the Bill is “overwhelmingly positive” for care leavers overall.²⁴⁹ In welcoming the changes, CIH Cymru called for the Bill to specify that work should start when a care leaver is 16 rather than at 18 when they are leaving care, to allow enough time to ensure that any support needs are addressed.²⁵⁰

Our view

284. We feel strongly that no young person leaving the care system should find themselves homeless. We therefore strongly welcome the Cabinet Secretary’s commitment to ensuring that young people leaving care do not enter the homelessness system and we support the inclusion of a duty on local authorities to take reasonable steps to secure suitable accommodation for this group. We believe that this is a very important aspect of the Bill. We do, however, have concerns that the universal duty will only apply to people up to 21 years of age and only to people aged between 21 and 25 if they are pursuing or wishing to pursue a programme of education or training. We are sympathetic to the views expressed by stakeholders that this group of vulnerable people remain at a higher risk of homelessness even after turning 21.

285. We understand the Welsh Government’s rationale for this approach is to ensure that this Bill is in line with the SSWB Act 2014, and understand that consistency across legislation is preferable to avoid confusion. However, we find it difficult to understand the logic for not extending the duty for all care leavers up to the age of 25. Given the importance of ensuring that young people leaving care are able to secure a stable home and avoid entering the homelessness system, we believe that consistency across legislation should not be the key factor in this situation.

Recommendation 15. We support the evidence from NYAS and recommend that the Welsh Government should assess the case for extending provisions aimed at care leavers in future, so that they apply to all up to the age of 25, not just those in education or training. This includes the duty to ensure that suitable

²⁴⁸ HSHAWB 34, Action for Children

²⁴⁹ Local Government and Housing Committee, 19 June 2025, RoP p341

²⁵⁰ Local Government and Housing Committee, 19 June 2025, RoP p462

accommodation is available for care leavers and the reasonable preference for social housing allocation, which we consider later in this report.

Protocol for handling cases involving persons in particular need of support

286. Section 25 requires local authorities to promote co-operation between themselves and public, voluntary or other bodies in the local area. It requires local authorities to make arrangements including a protocol for a multi-agency case coordination approach in respect of people at risk of homelessness who have multiple and complex support needs. The EM says that the Welsh Government does not intend to specify a model protocol of case coordination. The provision is supported by section 32 of the Bill, which places a duty on specified public bodies to co-operate with a request from a local authority unless doing so would be incompatible with the body's own duties or functions.

287. The proposal is supported by the amended section 95 of the 2014 Act, which enables local authorities to call on a wider range of specified public bodies to assist them to address homelessness objectives.

288. A focus group participant emphasised the importance of services working together:

"Homelessness is not just a housing issue, particularly with the complex individuals that are coming across our services and it's so fundamentally important that we're exploring the multidisciplinary nature of this and the need for other services to work with homelessness services to support individuals."

Focus group participant

289. CHC noted their strong support for the protocol, saying that "it is crucial for ensuring that those with multiple complex needs can access a holistic, joined up approach from the organisations and agencies involved in their care and support".²⁵¹ They highlighted the need for adequate funding for local authorities to ensure the provisions are effective and avoid costs being passed on to other bodies involved. Clwyd Alyn told us clarity is needed around which agency can initiate and request a response under the protocol.²⁵²

290. The Wallich highlighted that the provisions have been "considerably watered down" since the case co-ordination approach recommended in the White Paper.

²⁵¹ HSHAWB 14, Community Housing Cymru

²⁵² Local Government and Housing Committee, 26 June 2025, RoP p310

They note that the Bill “proposes only that ‘A local housing authority in Wales must make arrangements to promote co-operation between itself and such persons mentioned in subsection (1D)’” but believe “that case co-ordination is a vital part of the solution where people are engaged with multiple agencies, and risk falling through the gaps if those agencies fail to communicate and support rather than unintentionally undermine one another”.²⁵³

291. Other stakeholders who welcomed the protocol included the Children’s Commissioner for Wales and Clinks.

292. While local authorities generally welcomed the provisions, some questioned what the consequences would be if a public body failed to respond to a request to co-operate. Flintshire Council questioned “what the levers are that we pull on when collaboration isn’t there”,²⁵⁴ while Gwynedd Council’s written evidence also questioned what consequences there will be for agencies that fail to comply.²⁵⁵

293. The Cabinet Secretary said that powers exist already under the Local Government and Elections (Wales) Act 2021 and other relevant legislation to address any serious concerns in relation to joint working. However she said that “our aim is to bring about a culture of that shared responsibility, and not top-down enforcement.”²⁵⁶

Our view

294. We note that the provisions to promote co-operation between local authorities and public, voluntary or other bodies in the local area, including making arrangements for a protocol for a multi-agency case coordination approach in respect of people at risk of homelessness who have multiple and complex support needs were generally welcomed by stakeholders. Strong multi-agency partnerships are essential to the policy aim of ending homelessness. We note that local authorities are already working in this way as much as possible, but they do not always get the desired response from other public bodies due to competing priorities and resource pressures. We hope that the provisions in the Bill will support co-operation, but we also believe the Welsh Government should consider ways of giving more levers to local authorities to strengthen the measures. We acknowledge that the Cabinet Secretary said there are existing powers that could be used to direct public bodies. The statutory guidance should outline a clear procedure for using these powers, should local authorities require

²⁵³ HSHAWB 08, The Wallich

²⁵⁴ Local Government and Housing Committee, 26 June 2025, RoP p33

²⁵⁵ HSHAWB 41, Gwynedd Council

²⁵⁶ Local Government and Housing Committee, 26 June 2025, RoP p145

them. We also believe that the Welsh Government should monitor cooperation requests made by local authorities to understand how many are refused or ignored, in order to take further action if necessary.

Detained persons

295. Section 26 amends section 93 of the 2014 Act to provide that prisoners would still be owed a duty to protect property if they are not owed a main section 75 housing duty. The EM states:

“While this may appear to provide a service to additional people in custody, in reality it will maintain the level of the existing provision.”

296. A focus group participation expressed concern at the lack of information about accommodation that is sometimes available to someone upon release from custody:

“Everything is on the day of release as well and not set up pre-release. We obviously go into the prison to support but if they’re going to be given temp accommodation they don’t know that until the day they’re out and they have to go to Housing Options and wait and be sent back three hours later, when it could potentially be done a day or two before.”

Focus group participant

297. Section 27 strengthens the existing wording of section 60 of the 2014 Act with the aim of ensuring that a service to provide information and advice on homelessness is provided to people detained in the authority’s area or who have a local connection with its area.

298. Clinks described the duty to protect property as “a really positive step”, adding:

“I think protecting people’s property, even if they’re in custody, is a human right, really, isn’t it? It’s a good thing within the Bill. We’ve heard stories of people losing personal photos because landlords have chucked them out once they’ve gone into custody.”²⁵⁷

²⁵⁷ Local Government and Housing Committee, 26 June 2025, RoP p474

299. Some local authorities, including Ceredigion,²⁵⁸ Carmarthenshire²⁵⁹ and Monmouthshire²⁶⁰ raised the issue of costs associated with protecting property.

300. HMPPS told us that the provision to provide information and advice is “solidifying what we’ve got already” and did not foresee “a huge change” as a result.²⁶¹

301. Shelter Cymru referred to the provision as “a welcome step in ensuring that individuals in the secure estate receive housing advice”. However, they noted that “variations in local protocols may limit the relevance and quality of advice provided” and called for clear and practical guidance to “help local authorities fulfil this duty effectively”.²⁶²

302. The provisions were also supported by Cymorth Cymru²⁶³ and Crisis²⁶⁴.

Our view

303. We fully support the provision to protect a prisoner’s property while in custody. We heard evidence of prisoners losing personal possessions, including sentimental items, and recognise that the distress this can cause could impact their mental health, rehabilitation and resettlement following release. We acknowledge the concerns raised by local authorities at the potential cost implications associated with protecting property, although we note the Welsh Government’s RIA expects these to be minimal. We agree that the benefits of protecting property negate the cost implications.

304. We also support the provision to provide information, advice and assistance to detained persons. As we have stated previously, we are concerned that despite the prevention provisions in the 2014 Act and the existing prisoner pathway, people are still leaving custody straight into homelessness and we welcome policies to prevent that from happening. We recognise that the costs will fall on local authorities which host a prison, although note that the RIA states no additional costs are anticipated as this is a clarification of existing law.

²⁵⁸ HSHAWB 36, Ceredigion County Council

²⁵⁹ HSHAWB 52, WLGA

²⁶⁰ HSHAWB 38, Monmouthshire County Council

²⁶¹ Local Government and Housing Committee, 26 June 2025, RoP p462

²⁶² HSHAWB 12, Shelter Cymru

²⁶³ Local Government and Housing Committee, 19 June 2025, RoP p346

²⁶⁴ Local Government and Housing Committee, 19 June 2025, RoP p467

Definition of domestic abuse

305. Section 28 replaces the current definitions of “abuse” and “domestic abuse” under section 58 of the 2014 Act, widening the definition of “domestic abuse” in line with the Domestic Abuse Act 2021 so that it explicitly includes controlling or coercive behaviour, economic and psychological abuse. The legislation also refers to exploitation within the meaning of the Modern Slavery Act 2015 and harassment or stalking within the Protection from Harassment Act 1997, as examples of other kind of abuse that may give rise to a risk of harm, whether directly or indirectly.

306. We heard significant support for widening the definition of domestic abuse, including from Welsh Women’s Aid who described it as “excellent progress”.²⁶⁵ Other who voiced support include Crisis²⁶⁶, CIH Cymru²⁶⁷ and Dogs Trust²⁶⁸.

Our view

307. We welcome the widening of the definition of ‘abuse’ and ‘domestic abuse’ so that it is in line with the Domestic Abuse Act 2021, and so that it includes examples given in other legislation. We recognise the significant support expressed for widening the definition and agree that controlling or coercive behaviour, economic and psychological abuse should be reflected in housing legislation.

Seeking the views of homeless persons

308. Section 29 requires local authorities to consult people who have lived experience of homelessness when developing their local homelessness strategies and advice services. The Bill also requires the Welsh Government to consult with people with lived experience when developing, revising or withdrawing homelessness guidance.

309. The Wallich told us they are “delighted” that the Bill has a duty for local authorities to consult people with lived experience of homelessness, saying:

²⁶⁵ Local Government and Housing Committee, 19 June 2025, RoP p334

²⁶⁶ HSHAWB 43, Crisis

²⁶⁷ HSHAWB 28, CIH Cymru

²⁶⁸ HSHAWB 17, Dog’s Trust

“We know that the people who experience that often have the answers, and we just need to ask them, listen to them, and try and put that into practice.”²⁶⁹

Our view

310. We are pleased that the Bill stipulates that local authorities and the Welsh Government must consult people with lived experience of homelessness in developing strategies, services and guidance. We appreciate the importance of using that experience to ensure that services are tailored to meet people’s needs. There is concern with any consultation that engagement must be meaningful and that people’s views are listened to and acted upon. We know from our own engagement work that there are several networks of people with lived experience of homelessness supported by stakeholder groups who have invaluable experience to share. We trust that the Welsh Government and local authorities will use these well established networks to engage with people in a meaningful way.

Condition of accommodation

311. The condition of accommodation was raised as a concern by a focus group participant:

“I think again, within this legislation, so much of this needs to be focused around what’s the ambition that we have as a country in the standards that we are keeping and the basic quality of life that we are providing to our society. Because at the moment, the provisions that we’re providing people are just shocking. I think if people were to see those provisions more frequently, there would be uproar.”

Focus group participant

312. Section 30 seeks to expand current legal standards on suitability of accommodation by requiring local authorities to have regard to Part 4 of the Renting Homes (Wales) Act 2016 (condition of dwelling), which includes fitness for human habitation, when determining whether accommodation is suitable. The provisions differ from the White Paper proposal to prohibit accommodation with

²⁶⁹ Local Government and Housing Committee, 19 June 2025, RoP p353

Category 1 hazards from being deemed suitable, including accommodation deemed unfit for human habitation.

313. The White Paper provided that:

“the current legislation only provides that a local housing authority must ‘have regard to’ such physical conditions and characteristics, including the presence of hazards and overcrowding. This does not act as a complete prohibition which prevents placement of an individual or a household into such accommodation. Local housing authorities want to be able to offer the highest standard accommodation possible and the Housing Act 2004 requires local housing authorities to take appropriate enforcement action in relation to the confirmed presence of Category 1 hazards.”

314. The White Paper also included a range of other proposals to improve accommodation standards, addressing factors such as overcrowding, shared sleeping spaces, and location. The EM states that the Welsh Government intends to amend the Homelessness (Suitability of Accommodation) (Wales) Order 2015 (the Suitability Order) in future, to make changes to suitability requirements. The Expert Review Panel had also recommended that the Suitability Order be amended, and that “accommodation assessed as containing Category 1 hazards is never suitable”.

315. A further change is to the period during which an applicant can request a review of the suitability of the accommodation offer. The White Paper proposed extending the current 21 days to an open-ended review period. Following stakeholder feedback this has been reduced in the Bill to six months.

316. Section 31 places a new duty on Welsh Ministers to publish and lay before the Senedd a report on the use and condition of interim accommodation every five years, with the first report to be laid and published on or before 31 December 2030.

317. The Cabinet Secretary told us that the Welsh Government has not changed its position and that the provisions relating to human habitation and dwelling conditions should “not be mistaken as a replacement for our commitment relating to the prohibition of temporary accommodation with Category 1 hazards”. The Cabinet Secretary explained:

“This is an addition, not a replacement. We do not need new primary legislation to make any of our proposed changes to

suitability, set out in the White Paper, and I do intend to bring those forward using our existing secondary legislation powers. I'm going to work with local authorities to deliver our suitability proposals in due course, using those existing powers, recognising that some of them are dependent on the increased housing supply and will take time to deliver.”²⁷⁰

318. Concern was raised by some stakeholders that ‘having regard to’ rather than ‘prohibiting’ may be a less effective provision. Liz Davies KC called for the Bill’s wording to be strengthened to prohibit the use of temporary accommodation with Category 1 hazards, as per the White Paper proposal. She argued that the wording could be similar to the current provision in the Suitability Order for bed and breakfasts, to allow the use of such accommodation for very short periods of time if there are no other options.²⁷¹

319. Shelter Cymru expressed a similar view, noting that the language “lacks the necessary strength to hold local authorities fully accountable” and does not equate to requiring compliance with the 2016 Act. They were unclear as to how the Cabinet Secretary’s intention of pursuing change via secondary legislation would provide a better option. Shelter Cymru also noted that the Bill does not consider the issue of affordability within its understanding of suitability and emphasised that “unaffordable accommodation is unsuitable accommodation”.²⁷²

320. CIH Cymru asked for guidance to clarify how suitability reviews will work in practice if applicants can request a review up to six months post-discharge. Swansea Council “wholly disagree” with extending the period to six months and argued that 56 days would be a more acceptable time limit.²⁷³

321. While Shelter Cymru described the requirement to report on the use and condition of temporary accommodation as “a positive step”, they were unable support a five-year reporting cycle, stating:

“If temporary accommodation is to be truly suitable, local authorities and Welsh Government must be alerted to the use of accommodation in dangerous conditions far sooner. Delayed reporting risks prolonging harm and directly undermines the

²⁷⁰ Local Government and Housing Committee, 4 June 2025, RoP p152

²⁷¹ Local Government and Housing Committee, 19 June 2025, RoP p225

²⁷² HSHAWB 12, Shelter Cymru

²⁷³ HSHAWB 44, Swansea Council

Bill's commitment to a person-centred, trauma-informed approach.”²⁷⁴

322. The Bevan Foundation called for the Welsh Government to review the use and condition of temporary accommodation sooner than 2030 saying it is “widely acknowledged that the regulations in the Homelessness (Suitability of Accommodation) (Wales) Order 2015 are being widely broken”.

323. In response to whether the publication of the first report on the use and condition of temporary accommodation could be brought forward, the Cabinet Secretary confirmed that 31 December 2030 is a “final date for completion” and “doesn’t stop any report being undertaken at an earlier date”. She explained the reasoning behind the proposed timing is:

“to allow us to take the learning and align some research models, if they’re useful, with the full Welsh housing survey, which is going to be undertaken in 2027-28. [] the next survey, as you will know, will be more detailed than earlier surveys, and it’s going to help us gather evidence that will better support affordable housing and homelessness policies.”²⁷⁵

324. On the Welsh Housing Survey, the Cabinet Secretary added that:

“officials will develop a detailed tender specification, so that a procurement exercise can be commenced by the end of 2025-26, and that will enable field work to be carried out in 2027-28. And the results, then, will be available from 2028-29, so there’ll be more detailed findings from 2029-30.”

325. The Cabinet Secretary told us that some of the work could happen sooner but that the wider work she referred to provide “potential learning opportunities that will help inform the ongoing review of temporary accommodation that the Bill provides for”.²⁷⁶

326. A Welsh Government official went on to say that although data is already collected from local authorities on their use of temporary accommodation, “it would be a new data ask from them”, and it will be important “to ensure that that

²⁷⁴ HSHAWB 12, Shelter Cymru

²⁷⁵ Local Government and Housing Committee, 18 September 2025, RoP p111

²⁷⁶ Local Government and Housing Committee, 18 September 2025, RoP p112

ask is consistent” therefore “it’s really important for us to learn from the housing survey”.²⁷⁷

Our view

327. We acknowledge the Cabinet Secretary’s position that the use of ‘have regard to’ in the Bill as opposed to ‘prohibit’ in terms of the suitability of temporary accommodation with category 1 hazards is an additional provision, not a replacement and that she intends to use existing secondary legislation powers to make the suitability changes proposed in the White Paper. However we also note the evidence from several legal expert witnesses that the Bill’s wording lacks the necessary force for the purposes of legal challenge.

Recommendation 16. The Welsh Government should use existing regulation-making powers to amend the suitability requirements, and to prohibit the use of temporary accommodation which contains category 1 hazard and is unfit for human habitation.

Recommendation 17. The Welsh Government should update us on the changes to be made to the Homelessness (Suitability of Accommodation) (Wales) Order 2015, including the timescale for such secondary legislation. Changes prohibiting accommodation which is unfit for human habitation should be made as soon as possible, regardless of any further changes made which we understand are planned based on the temporary accommodation reviews required by the Bill.

328. We considered the use and quality of temporary accommodation at length in our [2023 report on homelessness](#). We recognise that local authorities are still struggling to source sufficient temporary accommodation due to the high demand but we remain concerned by the continued use of bed and breakfast accommodation and hotels as temporary accommodation. The evidence we heard through that inquiry referred to inconsistencies in the quality of temporary accommodation across Wales. We heard one witness say they have seen both “appalling” and “fantastic” accommodation, which costs the same to the individual living there regardless and that it is “luck of the draw” in terms of the quality and suitability of temporary accommodation placements. We therefore understand that the importance of collecting data and reporting on the use and quality of accommodation and hope that this will help improve the quality of accommodation and bring more consistency across Wales.

²⁷⁷ Local Government and Housing Committee, 18 September 2025, RoP p117

329. It is disappointing that the deadline for publishing the first of these reports is as late as December 2030 as we know that thousands of people are currently living in temporary accommodation, some of which could be completely unsuitable or poor quality. We acknowledge what the Cabinet Secretary said about this being the final date for publication, but feel it unlikely that the first report be available much earlier than that latest date given the timescale outlined for the next Welsh Housing Survey. While we understand the need for this work to be undertaken properly, it is disappointing that the first report is unlikely to be published until more than five years after the introduction of this Bill.

Co-operation

330. Section 32 amends section 95 of the 2014 Act, which places a duty on local authorities to promote co-operation, to place a duty on specified public bodies to co-operate with a request from a local authority unless doing so would be incompatible with the body's own duties or functions. The amendment expands the list of specified public bodies, in line with the list specified in section 21, including bodies in England as well as Wales. A regulation making power is included to allow Welsh Ministers to amend the list. This provision supports the protocol provided in section 25 and is considered earlier in this report.

331. Section 33 inserts a new section into the 2014 Act (section 96A), creating a new duty on social landlords to comply with a request from a local housing authority to provide suitable accommodation to an applicant owed the main housing duty under section 75 of that Act. The section requires social landlords to comply with such a request within a reasonable period unless it has good reasons for not doing so. The section defines a 'social landlord' as a registered social landlord or a private registered provider of social housing. The section enables Welsh Ministers to issue guidance, and states that local authorities and social landlords must be consulted in the development of that guidance. In cases where a social landlord does not have good reason not to comply or does not respond to a request within a reasonable period, the section empowers local authorities to refer the matter to Welsh Ministers, who may direct the social landlord to comply with the request.

332. A focus group participant highlighted the importance of co-operation in ensuring that all agencies work together to prevent homelessness:

"I've got one member, he got released in July last year... He's had two [RSL] interviews. He's still in in temp and has been for about nine months now. He's closing soon. I met with him the

other day, he said everything else is going fine, the only thing he hasn't got is housing."

Focus group participant

333. Professor Fitzpatrick told us she is "strongly supportive" of having such a duty on social landlords, saying "it's one of the most important ways that we can ease the current pressures on the temporary accommodation system and on the homelessness system more generally", adding:

*"We know that some housing associations do a huge amount in terms of rehousing homeless households, but we also know that the practice is extremely uneven across Wales."*²⁷⁸

334. Professor Fitzpatrick referred to the experience in Scotland where an equivalent provision is in place, saying that "it's very rare indeed for a housing association to refuse a referral of a homeless household in Scotland, far rarer than it is in England, where there isn't any such provision".²⁷⁹

335. CHC told us that the duty should be a "backstop when partnership working has broken down", adding:

*"I don't think we'd want to be in a position where, as a regular way of working, local authorities are dictating to RSLs what to do. [] I think we're looking at it as a backstop, so that in those cases where partnership working has broken down it will allow that allocation to go to the homeless household, if that's the right thing."*²⁸⁰

336. They added that there will be cases when a RSL will need to refuse a request for various reasons, such as if the "right type of home" or "the right type of support" needed to make it work for somebody is not available. They called for some changes "to make this part of the legislation work better for everybody", in particular around a RSL having "more clarity on the support needs of the tenant before accepting a referral".²⁸¹ They called for the duty on social landlords to be matched "with a commensurate duty on LAs to make relevant information on

²⁷⁸ Local Government and Housing Committee, 19 June 2025, RoP p143

²⁷⁹ Local Government and Housing Committee, 19 June 2025, RoP p144

²⁸⁰ Local Government and Housing Committee, 26 June 2025, RoP p335

²⁸¹ Local Government and Housing Committee, 26 June 2025, RoP p336 & 340

housing and support needs available” to enable the social landlord to “take an informed view on whether they can reasonably comply”.²⁸²

337. Although some local authorities welcomed the duty, others voiced some reservations. Newport City Council expected referral to Welsh Ministers to happen in “very, very rare circumstances” but raised concern at a local authority’s ability to escalate while maintaining a positive relationship with the RSL in question.²⁸³ Pembrokeshire County Council told us they would have preferred the Bill to have provided for a joint allocations policy, noting that it might prevent some of the issues if a RSL refuses a request, adding:

*“We don’t want the unintended consequence from the legislation to damage those relationships.”*²⁸⁴

338. Rhondda Cynon Taf CBC also voiced support for a common allocation policy, as in their experience of having a common allocation policy in place for ten years has been successful “because the policy is there. You go to the person at the top of the list and who that best matches”.²⁸⁵

339. Cymorth Cymru were very supportive of the provision, noting that it “won’t affect the majority of RSLs, who are doing excellent work in this area”, but “those that are not allocating enough numbers from homelessness” need to “up their game” and whom are likely to be affected by it. Cymorth added that “social housing allocations is actually one of the items that is likely to have the greatest impact on homelessness”.²⁸⁶

340. The Cabinet Secretary explained that the power for local authorities to refer a RSL to the Welsh Ministers reflects “the critical role of social landlords” in delivering settled housing, and “the need for a clear mechanism to resolve disputes where co-operation breaks down”.²⁸⁷

341. In response to the call for a local authority to share details of an applicant’s support needs, the Cabinet Secretary told us that she has considered the suggestion carefully, but that she is “not inclined to support it as I’m not sure that it’s workable or necessary”. She acknowledged the importance of all partners understanding the types of support needed and providing them with suitable accommodation to prevent that repeat cycle of homelessness, adding that

²⁸² HSHAWB 14, Community Housing Cymru

²⁸³ Local Government and Housing Committee, 26 June 2025, RoP p147-148

²⁸⁴ Local Government and Housing Committee, 26 June 2025, RoP p153

²⁸⁵ Local Government and Housing Committee, 26 June 2025, RoP p158

²⁸⁶ Local Government and Housing Committee, 19 June 2025, RoP p374-375

²⁸⁷ Local Government and Housing Committee, 18 September 2025, RoP p145

“several provisions in the Bill have been drafted with the aim of improving partnership working and that exchange of information”.²⁸⁸

Our view

342. Affordability issues in the private rented sector mean that social housing is central to address homelessness. It is disappointing that the data on allocations is not more robust in Wales, however we note the research cited by the Welsh Government’s White Paper and EM which suggests that the number of allocations to homeless households is comparatively low, at least among some social landlords. We note that the co-operation provisions were broadly supported by stakeholders, and the view that this provision has the potential to increase flow through temporary accommodation and make a significant difference to the success of the legislation. We also welcome that the Welsh Government is willing to intervene where needed to support co-operation, although we note that local authority representatives and those from the RSL sector both voiced caution at the use of these powers. We welcome the view expressed by both sides that the power should be used rarely and only as a last resort if all partnership working fails. We agree that partnership working is crucial in maintaining key effective relationships between key agencies and should be pursued over alternative means.

Conclusion 11. Strong guidance on the use of the power to refer will be needed and developed by the Welsh Government in partnership with local authorities and RSLs.

Conclusion 12. The Welsh Government should consider how it intends to monitor the impact of the provisions in terms of allocations acceptances and refusals.

343. We agree with the view expressed by RSLs that they should be aware of a tenant’s support needs before accepting a referral, as this seems reasonable information to have when deciding whether they can comply with a request from a local authority. The Cabinet Secretary said she believes a commensurate duty is not needed. We believe that this could be successfully addressed via tightly defined refusals guidance, potentially based on the Scottish Government’s guidance covering circumstances in which Scottish social landlords may refuse an equivalent referral (a ‘Section 5 referral’).

Recommendation 18. We recommend that the Welsh Government publishes tightly defined referrals guidance that specifies the circumstances in which RSLs

²⁸⁸ Local Government and Housing Committee, 18 September 2025, RoP p183-184

may refuse a referral, and also stipulates effective information-sharing about any support needs the applicant may have.

Conclusion 13. We believe that, once implemented, the provisions relating to co-operation between local authorities and RSLs will need to be carefully monitored to assess how they work in practice.

Viewing accommodation

344. Section 34 creates a new duty on local authorities to take “reasonable steps” to provide an applicant with an opportunity to view accommodation being offered, “whether in person or otherwise”, before the local authority can end its homelessness duty on the basis that the applicant has refused a suitable offer. This is intended to ensure that any individual who is incapacitated and unable to view the accommodation, for example if they are in prison or hospital, is able to see it.

Our view

345. We note the provision and believe this to be reasonable.

4. Part 2: Social housing allocation

The provisions in Part 2 of the Bill relate to social housing allocation.

Qualifying persons for allocation of social housing

346. Section 35 gives local housing authorities the discretion to decide what classes of person are or are not ‘qualifying persons’ for social housing in their area, provided they are not ineligible for allocation. The RIA explains that local authorities could use the discretionary power to:

“apply stricter eligibility criteria to determine qualifying persons for social housing when demand for social housing exceeds that supply, and then relax the criteria when there is less of a demand surplus”.

347. The aim of the provision is to manage waiting list figures and increase accessibility to housing for those in most housing need. The section also creates a new regulation-making power for Welsh Ministers to prescribe classes of people who may or may not be treated as qualifying persons owed reasonable preference in allocations.

348. The Cabinet Secretary set out the rationale for the provision, saying that local authorities should “have the flexibility to tailor that qualification criteria as necessary” as they “understand the specific needs and pressures of their area”. She added:

“with increasing demand for social housing, we’ve got to ensure that that housing is allocated to those in greatest need.”²⁸⁹

349. The Cabinet Secretary explained that the power is “subject to constraints”, with safeguards which will mitigate the “potential for unintended consequences”.²⁹⁰

350. While CHC understood the rationale for including the provision in the Bill, they remained concerned “that there is a risk in taking this approach that it could lead to negative perceptions of social housing and contribute to the existing

²⁸⁹ Local Government and Housing Committee, 4 June 2025, RoP p159

²⁹⁰ Local Government and Housing Committee, 4 June 2025, RoP p161

stigma that can be attached to living in social housing”. They called for guidance “to ensure that the approach taken is relatively consistent and that issues around perception and stigma are not exacerbated” and for RSLs to be involved in discussions and decisions on what should constitute a ‘qualifying criteria’.²⁹¹

351. Shelter Cymru said it had some concerns about the provision for local authorities to decide who are qualifying persons to go on the waiting list. Although this would not exclude any applicant in a reasonable preference category, Shelter Cymru’s view was that this could lead to having 22 different policies and a lack of clarity.²⁹² Crisis echoed these concerns, noting that the provisions were not “overly supported at consultation stage”. Their preference was to remove the provision, but emphasised that:

*“if it does remain, then making sure that that works effectively is going to be really crucial to make sure that it doesn’t unfairly discriminate against people, or jar with other parts of the Bill.”*²⁹³

352. The Bevan Foundation said it was not consistent with the Bill’s aims to provide a universal homelessness service, and could lead to opportunities for very early prevention being missed.

353. Liz Davies KC referred to numerous litigation cases following the introduction of a similar provision in England in 2012 and welcomed that the Bill is worded in a way that takes lessons from that experience.²⁹⁴ Crash Wigley was of the view that there will be legal challenges if the power is not used lawfully and suggested that careful guidance will be needed to ensure that the provision in this Bill does not lead to indirect discrimination.²⁹⁵

354. Several stakeholders voiced concern that some groups may experience discrimination as an unintended consequence of the provision. EYST noted:

“it is essential that equality considerations are at the very heart of these schemes. Our experience with clients shows that current housing allocation systems sometimes unfairly disadvantage ethnic minority applicants which happens in different ways like through indirect discrimination in “local area

²⁹¹ HSHAWB 14, Community Housing Cymru

²⁹² Local Government and Housing Committee, 19 June 2025, RoP p246

²⁹³ Local Government and Housing Committee, 19 June 2025, RoP p501

²⁹⁴ Local Government and Housing Committee, 19 June 2025, RoP p248-249

²⁹⁵ Local Government and Housing Committee, 19 June 2025, RoP p251

*connection" rules, language barriers that make the application process confusing, or unclear systems for how people are grouped and prioritised."*²⁹⁶

355. Concern at the potential for discrimination also raised by the Welsh Refugee Council²⁹⁷ and Housing Justice Cymru²⁹⁸. Wrexham CBC called for the provision to be revisited as it "provides an open door for future administrations, of different political persuasions not only to include groups of people as qualifying but also to remove them".²⁹⁹

356. The section also amends section 160A(7) of the 1996 Act, which enables a local housing authority to disqualify a person from allocation if they, or a member of their household, has been guilty of 'unacceptable behaviour' serious enough to make them unsuitable as a tenant. The amendment seeks to clarify the current legal position, which is that the local authority must take into account the likelihood of that behaviour reoccurring, so that where a person has taken steps to change their behaviour, their past history does not continue to impact their housing stability.

357. Wrexham CBC also raised concerns, querying the type of factors and circumstances which should be taken into consideration and the pressure put on a housing officer in assessing whether a person is likely to engage in unacceptable behaviour, including domestic abuse, again. Wrexham also noted that this provision contradicts the removal of the intentionality test, stating:

*"An applicant could be disqualified for an allocation of social housing as a result of their behaviour but be given a homeless duty. In practice, this means that some households could spend significant periods of time in temporary accommodation."*³⁰⁰

Our view

358. We are deeply concerned that the Bill's reforms to social housing allocations are taking place in the absence of robust data. Not only does this potentially weaken the case for those reforms, but it will also make it harder to understand what the impacts of any reform will be. We note that the Welsh Government has published two research reports on allocations, both of which present a partial

²⁹⁶ HSHAWB 40, Ethnic Minorities and Youth Support Team

²⁹⁷ HSHAWB 03, Welsh Refugee Council

²⁹⁸ HSHAWB 42, Housing Justice Cymru

²⁹⁹ HSHAWB 27, Wrexham County Borough Council

³⁰⁰ HSHAWB 27, Wrexham County Borough Council

data picture. The recently developed Ending Homelessness Outcomes Framework also does not include satisfactory data on who is waiting for and who is being offered social housing. This must be improved. The Welsh Government should collect and publish data on households on social housing waiting lists and households that are allocated social housing, including households refused an allocation.

Recommendation 19. The Welsh Government should establish a national common standard for data on social housing waiting lists and allocations, publishing robust data at local and national level.

359. We do not understand the rationale for providing local housing authorities with a discretionary power to determine categories of people eligible for social housing allocation and are sceptical at its inclusion in the Bill. We appreciate that waiting lists are currently very long and that many of the people on those lists may be unlikely to be allocated a social home for many years if their level of housing need is not urgent. However, we are very concerned that the provision of this discretionary power will move us away from the universal idea that anyone can apply for social housing.

360. Even though some applicants may have little prospect of being allocated a home for many years, we are concerned that this provision is removing the ‘hope factor’ that may give some people a sense of positivity about the future possibility of an allocation. We also feel that while this is a provision made in response to current levels of demand, those pressures may not always be a factor in future.

361. We agree with the concerns voiced by some stakeholders that it could lead to inconsistent practices across Wales. We realise that local authorities all face different pressures and circumstances vary across areas, therefore while we do support the need for flexibility we are concerned that 22 different approaches could lead to significant inconsistencies.

362. Another concern we have is the prospect of potential discrimination as an unintended consequence of the provision. Whilst we realise that local authorities are required to adhere to equality legislation and trust that this discretionary power would not be used to discriminate against, we are mindful of the evidence presented and must acknowledge these concerns.

363. We do not believe that the Welsh Government has made a case for including these provisions in the Bill and we are currently unable to support their inclusion. We also feel that the creation of qualifying persons criteria contradicts the abolition of the priority need test.

Recommendation 20. The Welsh Government should make its case for including the provision to create qualifying persons criteria in the Bill, and unless it can do so, the provision should be removed.

364. Should the Welsh Government make a case for retaining the qualifying persons criteria in the Bill, we agree with the suggestion that that RSLs should be involved in discussions and decisions on what should constitute ‘qualifying criteria’. Additionally, we have reached the following conclusions which the Welsh Government should act upon if the qualifying persons criteria is retained:

Conclusion 14. Clear guidance will be needed on the implementation of the power in section 35 to determine categories of people eligible for social housing. While local authorities will need flexibility to use the power to meet their local needs, significant divergence across Wales should be avoided to prevent a postcode lottery. Guidance should also be clear that equality legislation should be adhered to when deciding on qualifying criteria. RSLs should be involved in discussions and decisions on what should constitute ‘qualifying criteria’.

Conclusion 15. The Welsh Government should keep the qualifying persons provision under review and remove it in future if it is no longer needed or causing significant unintended consequences.

365. As we have stated earlier in this report, we agree that local authorities should have appropriate tools to respond to unacceptable behaviour by tenants, however we are concerned that disqualifying someone from social housing allocation does not offer a sustainable solution. If a person is disqualified from social housing but is owed a duty for homelessness support, they will be placed into temporary accommodation until a long term home is found with the only option being the private rented sector (“PRS”). Given the lack of affordable housing available in the PRS, as highlighted in our 2024 [report](#), we feel it unlikely that someone disqualified for unacceptable behaviour will be offered a private tenancy, thereby resulting in a long stay in temporary accommodation and potentially repeat homelessness if the individual’s support needs remain unaddressed.

366. As with the provision to end a duty to provide homelessness support for unacceptable behaviour, we believe that options for providing further support should be put in place before action is taken to disqualify someone. Strong guidance for local authorities will be needed.

Conclusion 16. Disqualification from social housing allocation does not provide a sustainable solution to tackling unacceptable behaviour and further support should be provided prior to such action being taken. The Welsh Government

should provide strong trauma-informed guidance to ensure that exclusion from social housing is only used in extreme cases.

Preference for persons in allocation schemes

Deliberate manipulation

367. Section 36 inserts a new section 167A in the 1996 Act to introduce a new ‘deliberate manipulation’ test to apply when local authorities find that an applicant has tried to deliberately manipulate the homelessness system to gain advantage when applying for social housing. The test would not affect access to statutory homelessness assistance but would mean the applicant has no preference for an allocation of social housing. This is intended to replicate the disincentive effect of the intentionality test, however the Cabinet Secretary emphasised that it is not a replacement.

368. The Cabinet Secretary told us that the test will:

“ensure that resources are directed at those most in need and send a clear message that homelessness is not a route into social housing.”³⁰¹

369. The WLGA is of the view that the deliberate manipulation test is “not an effective replacement” for the intentionality test as it would be applied at allocation stage which they believe will result in “the unsatisfactory and expensive prospect of an applicant remaining in temporary accommodation for an extended period of time with no prospect of being able to access social housing.”³⁰² This view was also expressed by local authority representatives, including Cardiff Council and Newport City Council.³⁰³

370. The WLGA explained that “if an applicant is ineligible for social housing, one of the only move-on options would be the Private Rented Sector. With current low Local Housing Allowance (LHA) rates and extremely high rents, this is not an affordable option for many applicants”.³⁰⁴ Cardiff and Newport councils echoed this concern, with Newport noting:

“If the private rented sector, for example, is the only tenure you’re going to be able to access because you’ve deliberately

³⁰¹ Local Government and Housing Committee, 4 June 2025, RoP p74

³⁰² HSHAWB 52, WLGA

³⁰³ Local Government and Housing Committee, 26 June 2025, RoP p45, 51 & 69

³⁰⁴ HSHAWB 52, WLGA

*manipulated the system, then people are stuck, and the reality of life in temporary accommodation is that it's incredibly difficult for people. Rents can often be high because of the short-term nature of the accommodation. People can need to move at short notice, and people can often be sharing facilities, and that can have an impact on lots of different areas of someone's life. So, I think there's a real risk that there's an unintended consequence that the experience of homelessness almost becomes a little bit more traumatic because of that."*³⁰⁵

371. Similar concerns around extending the time spent in temporary accommodation were raised by other local authorities including Monmouthshire,³⁰⁶ Neath Port Talbot,³⁰⁷ Conwy³⁰⁸ and Carmarthenshire³⁰⁹.

372. Wrexham CBC called for clarification in terms of the expected period of time such a sanction could last.³¹⁰

373. The WLGA called for the removal of the deliberate manipulation test from the Bill and for the retention of the intentionality test.³¹¹

374. CHC and representatives of RSLs told us that clear guidance will be needed to set out when the test would apply within the allocations process. CHC said:

*"you need to know when that test is going to be performed. You don't want to get to the point of allocating someone a home and get them to sign a contract before somebody thinks to perform it."*³¹²

375. Some witnesses raised concern that deliberate manipulation remains too similar to intentionality and could lead to unintended consequences of penalising applicants, for example for having communication issues or an abusive partner. Crash Wigley raised a particular concern that the provisions in new section 167A(2)(b)(ii), as drafted, are not clear that a person have needed to have done or not done something with the intent of deliberately manipulating the system.³¹³

³⁰⁵ Local Government and Housing Committee, 26 June 2025, RoP p70

³⁰⁶ HSHAWB 38, Monmouthshire County Council

³⁰⁷ HSHAWB 16, Neath Port Talbot County Borough Council

³⁰⁸ HSHAWB 37, Conwy County Borough Council

³⁰⁹ HSHAWB 52, WLGA

³¹⁰ HSHAWB 27, Wrexham County Borough Council

³¹¹ HSHAWB 52, WLGA

³¹² Local Government and Housing Committee, 26 June 2025, RoP p253

³¹³ Local Government and Housing Committee, 19 June 2025, RoP p177-178

Welsh Women's Aid emphasised that if someone had been found to manipulate the system "due to the circumstances that they've found themselves in", that finding should not then "follow them in their future interactions with housing and homelessness".³¹⁴ This was also raised by the NRLA³¹⁵ and Professor Dave Cowan who cited three examples that he believed would be caught by the provision.³¹⁶

376. Witnesses including Shelter Cymru,³¹⁷ Cymorth Cymru,³¹⁸ The Wallich,³¹⁹ and Crisis³²⁰ acknowledged that, although they would prefer not to have the provision in the Bill, its inclusion was important to other stakeholders particularly local authorities.

377. The NRLA called for robust guidance to ensure that tenants are not caught by deliberate manipulation if they withhold rent in good faith under the Renting Homes (Wales) Act 2016 due to a belief that the property is not fit for human habitation. They also called for guidance to ensure that "tenants and landlords are encouraged to work together to find a sensible outcome, and to ensure that the deliberate manipulation test is not applied widely to possession claims in Wales".³²¹

Our view

378. We recognise that there was very little support expressed by stakeholders for the deliberate manipulation test. On the one hand, some stakeholders were concerned that the test is too similar to the intentionality test, while local authorities called for the removal of deliberate manipulation from the Bill and the retention of the intentionality test. Having considered the different views, and in recognition of local authorities needing to be able to deal with the small number of people who may try to manipulate the system, we accept the rationale for this provision.

379. We appreciate the view of local authorities that the current intentionality test is a stronger deterrent, however as this new test would only mean that an applicant has no preference for an allocation of social housing and would not affect access to statutory homelessness, it should provide a solution that does not

³¹⁴ Local Government and Housing Committee, 19 June 2025, RoP p300

³¹⁵ HSHAWB 19, National Residential Landlords Association

³¹⁶ HSHAWB 21, Dave Cowan

³¹⁷ Local Government and Housing Committee, 19 June 2025, RoP p180

³¹⁸ Local Government and Housing Committee, 19 June 2025, RoP p288

³¹⁹ Local Government and Housing Committee, 19 June 2025, RoP p290

³²⁰ Local Government and Housing Committee, 19 June 2025, RoP p414

³²¹ HSHAWB 19, National Residential Landlords Association

result in homelessness. We acknowledge that losing a preference is likely to result in longer time spent in temporary accommodation.

380. As we have said in conclusion 3, we believe that the Welsh Government should support all local authorities to prepare for implementation by adopting existing good practice in avoiding the formal use of intentionality. We believe that such preparation will help to avoid the unintended consequence of large numbers of households being stuck long-term in temporary accommodation if they are formally found to have deliberately manipulated the system.

381. It will be important to ensure that the test will be used in a trauma-informed way and local authorities will need strong guidance on this. We re-iterate our view that the test should only be used as a last resort when all other approaches have not been effective. Local authorities will need those other tools, particularly when dealing with people with complex needs, and will need to be mindful of cases where someone may appear to be manipulating the system, but are doing so through no fault of their own.

382. We are aware that currently, in relation to the intentionality test, when determining an applicant's entitlement to certain duties, if it becomes clear to a local authority that the applicant could be found to be intentionally homeless, it is recommended that the authority notifies the person in writing that they are minded to find them intentionally homeless. We recognise that these 'minded to letters' are a softer approach to raise an applicant's awareness to the potential outcome if they undertake particular actions and provide an opportunity to prevent that from happening. We believe there is merit in exploring whether a similar approach could be taken in future when local authorities consider deliberate manipulation.

Recommendation 21. As the Code of Guidance will need to be updated to reflect the changes being made by this legislation, the Welsh Government should revise the Guidance to specify that a local authority may write to an applicant, noting that they are minded to find them to be deliberately manipulating the housing system, in the same way as the Code of Guidance provides such powers in the context of intentionality.

Recommendation 22. The Welsh Government should address concerns about possible unintended consequences arising as a result of new section 167A(2)(b)(ii) of the Housing Act 1996. Evidence provided by legal professionals highlighted how the deliberate manipulation test could negatively impact people who may not intend to manipulate the housing system, but may be considered to have done so given the way the Bill is drafted.

Preference for young people leaving care

383. Section 37 amends the 1996 Act to create a sixth ‘reasonable preference’ category in social housing allocations for young people leaving care, in line with section 23. The aim is to ensure that the homelessness system should not be used as the default route from care into independent living. As with the provisions in section 23, the provisions will apply in line with the categories of young people set out in the SSWB Act 2014.

384. The provisions were welcomed “in principle” by NYAS but they raised concern that the duty will only apply universally to care leavers up until the age of 21. They called for “amendments to make sure the duties within section 37 apply to all care leavers up to the age of 25, regardless of their education or training status”.³²²

385. Action for Children also welcomed the preference for care leavers but noted concerns that “the delivery of these intentions will be complicated by the limited amount of housing stock, particularly in terms of transition from residential care to independent living”.³²³

386. Rhondda Cynon Taf CBC referred to the provision as “a very positive aspect of the Bill”, but queried whether it “goes far enough”, noting that care leavers would still be “competing with other people within some of the higher bands”.³²⁴

387. Cardiff Council questioned whether the new reasonable preference category is blind to local connection, and raised concerns that this could lead to a high number of care leavers presenting to the waiting list in Cardiff and getting a high priority.³²⁵ Pembrokeshire Council called for enough supported accommodation for 16- and 17-year olds.³²⁶

388. The provisions were welcomed by the Children’s Commissioner for Wales,³²⁷ Crisis,³²⁸ Cymorth Cymru³²⁹ and The Wallich³³⁰. The Wallich noted:

³²² HSHAWB 05, NYAS Cymru

³²³ HSHAWB 34, Action for Children

³²⁴ Local Government and Housing Committee, 26 June 2025, RoP p161

³²⁵ Local Government and Housing Committee, 26 June 2025, RoP p163

³²⁶ Local Government and Housing Committee, 26 June 2025, RoP p166

³²⁷ HSHWAB 32, Children’s Commissioner for Wales

³²⁸ Local Government and Housing Committee, 19 June 2025, RoP p500

³²⁹ Local Government and Housing Committee, 19 June 2025, RoP p341

³³⁰ Local Government and Housing Committee, 19 June 2025, RoP p343

“We strongly support the reasonable preference category for young people leaving care, as this will be a powerful safeguard against homelessness for care leavers.”³³¹

Our view

389. We strongly welcome the creation of a sixth ‘reasonable preference’ category in social housing allocations for young people leaving care and note that this is in line with recommendations made by the Expert Review Panel and the Senedd’s Children and Young People Committee in its response to the White Paper. As we have said previously, we feel strongly that no young person leaving the care system should find themselves homeless and the creation of a reasonable preference category for this group makes it clear that they are a high priority.

390. Although we welcome the provision, we remain concerned that, as with the other provisions relating to care leavers, it will only apply universally to people up to 21 years of age and to people aged between 21 and 25 only if they are pursuing, or wishing to pursue, a programme of education or training. We re-iterate our view that such support should be available to all care leavers up to 25 years old regardless of their educational status.

391. As we have stated in recommendation 15, the Welsh Government should assess the case for extending provisions aimed at care leavers in future, so that they apply to all up to the age of 25, not just those in education or training, including the reasonable preference for social housing allocation.

Other groups

392. We also considered whether other groups of people should be granted preference within social housing allocations.

393. Mixed views were expressed on the decision not to take forward the White Paper proposal of awarding ‘additional preference’ to homeless households. Some witnesses, including Crisis³³² and Cymorth³³³ expressed disappointment, while CHC stated they agreed with this proposal being dropped³³⁴. Gwynedd Council called for a mechanism to give greater statutory priority to households living in temporary or emergency accommodation.³³⁵

³³¹ HSHAWB 08, The Wallich

³³² Local Government and Housing Committee, 19 June 2025, RoP p501

³³³ Local Government and Housing Committee, 19 June 2025, RoP p376

³³⁴ Local Government and Housing Committee, 26 June 2025, RoP p352

³³⁵ HSHAWB 41, Gwynedd Council

394. The Cabinet Secretary told us that the proposal was not included in the Bill as during the consultation period “many stakeholders made a very strong case as to why giving additional preference to those owed a homelessness duty may have unintended consequences and drive perverse incentives into the system”, and that every local authority “warned against it”. She added:

“I think awarding additional preference to those in temporary accommodation could lead to the adverse effect of funnelling people into temporary accommodation who don’t need to be there, in order to increase their priority for social housing. It also would negatively impact prevention efforts, and also the use of more effective short-term accommodation, such as staying with a family or friends for a short period of time.”³³⁶

395. We also considered the potential for exempting veterans from the local connection test for social housing allocations. The Veterans’ Commissioner for Wales shared concerns that the Bill “does not provide exemption from the local connection test for military veterans and their families in Wales”. The Commissioner noted that 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”.³³⁷

396. We discussed this with the Cabinet Secretary who explained that:

“In England, veterans are no longer required to have a local connection to qualify for social housing. Prior to December 2024, this exemption did not apply to veterans who had served more than five years. [] This restriction has now been removed, but no changes have taken place in relation to the homelessness local connection test in England

It’s important to recognise that in Wales, anyone can register for social housing in any area. We have the power to remove the local requirement for veterans for social housing allocations in Wales, as they have done in England, and so we do not need this Bill to do that.”

³³⁶ Local Government and Housing Committee, 18 September 2025, RoP p190-191

³³⁷ HSHAWB 31, Veteran’s Commissioner for Wales

397. The Cabinet Secretary confirmed that Welsh Government officials are working on plans to bring this change through secondary legislation and, “subject to the timescale of the Senedd, this will be brought in alongside this Bill”.³³⁸

Our view

398. We accept the Cabinet Secretary’s rationale against taking forward the proposal for an ‘additional preference’ category for homeless households given the possible unintended consequences. We agree that this group already falls within other preference criteria and are therefore classed as a priority for social housing allocation.

399. We welcome the Cabinet Secretary’s commitment to bring forward secondary legislation alongside the Bill, to exempt all veterans from the local connection test for social housing allocations in Wales, and that this will bring entitlement in line with provision in England.

Registers

400. Section 38 inserts a series of four new sections (160B – 160E) in to the 1996 Act to require all local authorities to operate a common housing register, which is a single register for all people who have applied for social housing in the area. The EM explains that 19 of the 22 Welsh local authorities already operate common housing registers. The intention is to simplify the process of applying for social housing in all areas.

401. The section also requires local authorities to operate an accessible housing register, to include all housing in the area that has features that may assist people with accessibility requirements. This is intended to improve how accommodation is matched to applicants who may need accessible housing because of disability, health conditions, age or other factors.

402. The Bill creates a regulation-making power for Welsh Ministers to make further provisions in relation to how accessible housing registers operate.

403. A focus group participant highlighted the challenges of having different application processes in place:

“And them all having different application processes. The standard process varies from organisation to organisation and

³³⁸ Local Government and Housing Committee, 4 June 2025, RoP p87-88

county to county. It's as if they're not being governed and they pick and choose."

Focus group participant

404. Most witnesses were positive about the requirement to have common housing registers. However, a concern was raised by Crash Wigley³³⁹ and CHC³⁴⁰ in relation new section 160B, which as drafted, specifies that a RSL or a private registered provider of social housing may only offer housing accommodation to a person included on the common housing register for that area. They argued that the legislation needs to allow flexibility for some allocations to take place outside that register, such as private rented accommodation, student accommodation, intermediate rent accommodation, and urgent transfers.

405. Cymorth supported the establishment of common housing registers, saying that where local authorities do not have them, it can cause confusion for applicants.³⁴¹ Tai Pawb were also supportive, in particular of the provision to establish an accessible housing register. They referred to their own research on this and suggested that "future guidance take account of our key findings and recommendations".³⁴²

406. Monmouthshire Housing Association said that "a common housing register is a positive step toward simplifying access to social housing" but added that further clarity is needed regarding the accessible housing register "specifically, how adaptations will be defined and whether a separate register is necessary, given that many Common Housing Registers already manage accessible housing allocations effectively within existing systems".³⁴³

407. Concerns were raised by Swansea, Neath Port Talbot and Wrexham councils around the cost implications of moving to a Common Housing Register.

408. The Cabinet Secretary accepted that the drafting of section 160B "could well be very broad" and "potentially captures accommodation types that are not ordinarily let via a common housing register". She told us that consideration is being given to "whether an amendment to the current drafting would help meet our policy intention" but clarified that:

³³⁹ Local Government and Housing Committee, 19 June 2025, RoP p257

³⁴⁰ Local Government and Housing Committee, 26 June 2025, RoP p355 & 356

³⁴¹ Local Government and Housing Committee, 19 June 2025, RoP p375

³⁴² HSHAWB 07, Tai Pawb

³⁴³ HSHAWB 38, Monmouthshire County Council

“the common housing register will only apply to social housing and that would mean an immediate accommodation. Other forms of accommodation could be offered outside of the common housing register. [] I think the potential amendment will ensure a common housing register addresses long-term social housing need while allowing for other types of housing tenures to operate outside its framework, and that would exclude transfers and mutual exchanges, which currently operate outside of and are not subject to the allocation rule.”³⁴⁴

Our view

409. We welcome the requirement for all local authorities to operate a common housing register. As the vast majority of local authorities already operate such a register, we agree that a requirement for universal coverage will improve consistency across Wales. We also support the requirement for an accessible housing register for each area as this is crucial in understanding the availability of properties for people with additional needs.

410. We are sympathetic to the view expressed by social landlords that there will be circumstances where they allocate properties to people not on a common housing register and that the Bill should take account of that. We therefore welcome the Cabinet Secretary’s commitment to consider bringing an amendment to new section 160B of the 1996 Act, inserted by section 38 of the Bill.

Conclusion 17. We welcome the Cabinet Secretary’s commitment to consider amending the Bill to allow for specified types of social housing allocation to take place outside the common housing register and request an update as part of the debate on the general principles of the Bill.

³⁴⁴ Local Government and Housing Committee, 18 September 2025, RoP p194

Annex 1: List of oral evidence sessions

The following witnesses provided oral evidence to the committee on the dates noted below. Transcripts of all oral evidence sessions can be viewed on the [Committee's website](#).

Date	Name and Organisation
04 June 2025	Jayne Bryant MS, Cabinet Secretary for Housing and Local Government Hannah Fisher, Head of Homelessness Prevention Legislation, Welsh Government Lynda Reid, Lawyer, Welsh Government Sarah Rhodes, Deputy Director Housing Policy, Welsh Government
19 June 2025	Sian Aldridge, Director of Operations, The Wallich Cerys Clark, Policy and Public Affairs Manager, Chartered Institute of Housing Cymru Katie Dalton, Director, Cymorth Cymru Liz Davies KC, Garden Court Chambers Professor Suzanne Fitzpatrick, Heriot-Watt University Helen Mary Jones, Deputy Chief Executive, Voices From Care Cymru Professor Peter Mackie, Cardiff University Gareth Lynn Montes, Housing Policy and Research Lead, Welsh Refugee Council Kate Perry-Jones, Head of Services and Survivor Engagement, Welsh Women's Aid Bill Rowlands, Head of Service, End Youth Homelessness Cymru

Date	Name and Organisation
	David Rowlands, Acting Head of Policy and Public Affairs, Tai Pawb Debbie Thomas, Head of Policy for Wales, Crisis Sharon Thomas, Support and Accommodation Service Manager, GISDA Phoebe White, Policy and Influencing Manager, National Youth Advocacy Service Robin White, Head of Campaigns, Shelter Cymru Crash Wigley, Landmark Chambers
26 June 2025	Leanne Chapman, GMB Regional Organiser GMB Martin Cooil, Housing and Prevention Service Manager, Flintshire County Council Dr Ayla Cosh, Clinical Director for Cardiff and Vale Health Inclusion Service, Cardiff and Vale University Health Board Paul Cotterell, Prison Officers' Association Cheryl Emery, Head of Community Safety and Community Housing, Rhondda Cynon Taf County Borough Council Louise Forman, Head of Operations, National Probation Service in Wales—Partnerships and Integration lead His Majesty's Prison and Probation Service Laura Garvey-Cubbon, Operational Manager, Partnerships and Joint Commissioning, Cardiff Council Bryn Hall, Senior Engagement and Development Officer, Clinks Emily James, Service Manager—Housing, Pembrokeshire County Council Ben Lloyd, G4S Community Director Elly Lock, Head of Policy and External Affairs, Community Housing Cymru

Date	Name and Organisation
	Suzanne Mazzone, Executive Director of Housing Services, Clwyd Alyn Sarah Schofield, Director of Customers and Communities, Adra Luke Takeuchi, Deputy Chief Executive, Beacon Cymru David Walton, Head of Housing and Communities, Newport City Council Clare Way, Director of Operations, Tai Tarian Helen White, Chief Executive, Taff Housing
18 September 2025	Jayne Bryant MS, Cabinet Secretary for Housing and Local Government Hannah Fisher, Head of Homelessness Prevention Legislation, Welsh Government Sarah Rhodes, Deputy Director, Housing Policy, Welsh Government Julie Stokes, Lawyer, Welsh Government

Annex 2: List of written evidence

The following people and organisations provided written evidence to the Committee. All Consultation responses and additional written information can be viewed on the [Committee's website](#).

Reference	Organisation
HSHAWB 01	Individual
HSHAWB 02	Craig Richards
HSHAWB 03	Welsh Refugee Council
HSHAWB 04	Voices from Care Cymru
HSHAWB 05	NYAS Cymru
HSHAWB 06	Professor Peter Mackie
HSHAWB 07	Tai Pawb
HSHAWB 08	The Wallich
HSHAWB 09	Welsh Women's Aid
HSHAWB 10	Prison Officers Association
HSHAWB 11	Cardiff and Vale University Health Board
HSHAWB 12	Shelter Cymru
HSHAWB 13	Monmouthshire Housing Association
HSHAWB 14	Community Housing Cymru
HSHAWB 15	Clinks
HSHAWB 16	Neath Port Talbot County Borough Council
HSHAWB 17	Dogs Trust
HSHAWB 18	Propertymark
HSHAWB 19	National Residents Landlords Association
HSHAWB 20	Adra
HSHAWB 21	Dave Cowan
HSHAWB 22	Mike Norman

Reference	Organisation
HSHAWB 23	Newport City Council
HSHAWB 24	Youth Justice Board
HSHAWB 25	South Wales Police & Crime Commissioner
HSHAWB 26	Welsh NHS Confederation
HSHAWB 27	Wrexham County Borough Council
HSHAWB 28	CIH Cymru
HSHAWB 29	Barcud
HSHAWB 30	Welsh Language Commissioner
HSHAWB 31	Veterans Commissioner for Wales
HSHAWB 32	Children's Commissioner for Wales
HSHAWB 33	Bridgend County Borough Council
HSHAWB 34	Action for Children
HSHAWB 35	Cardiff Council
HSHAWB 36	Ceredigion County Council
HSHAWB 37	Conwy County Borough Council
HSHAWB 38	Monmouthshire County Council
HSHAWB 39	Isle of Anglesey County Council
HSHAWB 40	Ethnic Minorities and Youth Support Team
HSHAWB 41	Cyngor Gwynedd
HSHAWB 42	Housing Justice Cymru
HSHAWB 43	Crisis
HSHAWB 44	Swansea Council
HSHAWB 45	Bevan Foundation
HSHAWB 46	Blaenau Gwent County Borough Council
HSHAWB 47	Play Wales
HSHAWB 48	Cwm Taf Morgannwg University Health Board
HSHAWB 49	Llamau
HSHAWB 50	British Red Cross
HSHAWB 51	Powys County Council

Reference	Organisation
HSHAWB 52	Welsh Local Government Association