

HSHAWB 50 Y Groes Goch Brydeinig

Senedd Cymru | Welsh Parliament

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

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

Ymateb gan: Y Groes Goch Brydeinig | Evidence from: British Red Cross

Homelessness and Allocation of Social Housing (Wales) Bill Submission to Stage 1 of legislative process Local Government and Housing Committee, Welsh Parliament July 2025

I Introduction

1. The British Red Cross welcomes the opportunity to respond to the Homelessness and Allocation of Social Housing Bill legislative scrutiny process. We welcome the opportunity to contribute late evidence, and focus on overarching comments.

2. The Red Cross provides a range of homelessness support, including:
 - Refugee family union support services in Wales
 - Destitution assistance and protection services in Cardiff for refugees, asylum seekers and vulnerable migrants, including those with precarious status and facing destitution
 - Resettlement services in the Wrexham and Neath Port Talbot areas, primarily under the Syrian resettlement scheme and Afghan Relocation and Assistance Policy (ARAP).

3. The Red Cross also assisted in delivering the Ukraine scheme in Wales, particularly through the support to displaced people who arrived in Wales on the Family Scheme, which has informed learning in other areas. Currently, the British Red Cross offers support to displaced Ukrainians on the Family visa scheme, as part of its wider family reunion support services in Wales. During the surge phase of the Ukraine response in March 2022, the British Red Cross established two main teams of refugee support services:
 - A team which provided support to displaced people across Wales who entered the UK via the Ukraine Family Visa Scheme. This programme

remains in operation, and has been expanded to include people who arrive from other countries under Refugee Family Reunion visas

- Another team contracted by the local authority to provide support to displaced people who arrived via the Homes for Ukraine Visa Scheme (no longer in operation).
- Our refugee support teams have also helped over 5,000 displaced Ukrainians across the UK with casework to access essential services, such as housing, and over 200 Ukrainians in Wales as of August 2024.

4. We are submitting evidence to support scrutiny of the Bill, drawing on our operational work and expertise, including research based on people's experiences of homelessness set out in:

- [Together at Last report](#) published in 2022, which sets out learning on ways to effectively support integration for reuniting refugee families,
- [Finding a Safe Home](#), which explores how to improve accommodation for displaced Ukrainians and build on what works for other displaced people too (published in 2024), and
- [Still at Risk: Ukrainian homelessness in the UK](#) a homelessness forecasting analysis for displaced Ukrainians across the UK

5. Our evidence focuses primarily on highlighting risks of homelessness, housing support systems and mechanisms identified as effective in assisting reuniting refugee families and Ukrainians to rebuild their lives and connect to host communities. However, these insights also offer lessons that are relevant to other groups in need of protection. It is intended to highlight learning from frontline practice relevant in particular to implementation of the Bill, including subordinate legislation and guidance to local authorities.

6. British Red Cross would be delighted to provide further information on any of the points made in this submission, should that be helpful.

II Key points

Our key asks in relation to this submission are focused on:

- **Early intervention:** The focus on early intervention is welcome. To be meaningful, detailed regulations and guidance must be informed by lived experience. Key insights from our research with service users are highlighted throughout this submission.
- **Pre-arrival housing support for refugee families:** Providing support on housing options pre arrival for reuniting refugee families is vital to reduce strain on both families and local authorities.
- **Collaboration with voluntary and community sector organisations:** Effective implementation requires strong collaboration with voluntary and

community sector organisations. Our involvement can help deliver more responsive and positive outcomes.

- **Adequate resourcing:** Housing and homelessness support services must be sufficiently resourced to meet current and future demand. Without this, the system risks being overwhelmed, undermining the success of early intervention efforts.

III Comments on the Homelessness and Allocation of Housing (Wales) Bill

Overview

7. We recognise the housing pressures Welsh communities are facing, with demand outstripping supply, but through our work we have identified key solutions that can mitigate homelessness for refugees and the wider population. Our evidence submission highlights some of these.

Preventing homelessness is key to enabling independent living

8. The most recent figures from Crisis show that lets to new tenants have declined over the last decade, but that lets to homeless people now account for ~~over~~^{almost} half of this.¹ A focus on addressing homelessness is therefore timely, and it is welcome to see a focus on prevention and early intervention. British Red Cross has consistently emphasised inclusive and timely action to prevent and address homelessness, and welcomes a focus on powers that can assist in achieving this aim.
9. Effective and timely action by local authorities to support residents threatened with or affected by homelessness significantly contributes to the long term health and wellbeing of families and individuals, and also reduces pressure on other public services, including the NHS as well as local authority services more broadly.
10. It is positive to see that the Bill reflects on the needs of specific groups and challenges people may have in understanding information given to them by housing officers, including advice on rights and entitlements, as well as formal communications including letters regarding housing status, offers and options regarding an offer, and potential ending of support. However, explicitly including displaced people within this cohort would provide greater clarity for local authorities and ensure they are equipped - and mandated - to address

¹ Crisis (2025) [Homeless Monitor Wales 2025](#)

the unique challenges this group faces. Doing so would support more inclusive service planning and delivery.

11. The focus on data collection is also helpful, as this supports both local authorities and VCS organisations to better prepare and plan services. To strengthen this, homelessness figures should be disaggregated by applicant group, on a monthly basis to gain a full picture of need, and allow for effective planning.

12. Our [current forecasting of homelessness](#) among displaced Ukrainians in the UK estimates that Ukrainians are over twice as likely to experience homelessness compared to the general population. In Wales, specifically, our forecasts show around 135 Ukrainian households are likely to experience statutory homelessness in the financial year 2025, while around 139 Ukrainian households are likely to experience core homelessness (e.g. sofa surfing or rough sleeping)². However, our estimates for Wales are more limited because there is less publicly available data on homelessness than in England or Scotland. This makes it harder to anticipate and respond to homelessness pressures.

13. We would welcome the Bill making provision for the regular publication of homelessness figures (e.g. once a month) based on local authorities' statutory duties (including a snapshot of those in temporary accommodation), and specifying where these are owed to displaced Ukrainians and other refugees. Publicly accessible and good quality data on homelessness risks for displaced Ukrainians and other refugees would contribute to better understand the scale of the issue, inform long-term planning and help design future schemes in a more sustainable manner.

14. Our report, [Finding a Safe Home](#)³ (2024) shows that access to safe, secure, and longer-term housing, and where necessary support in finding such housing as seen in localised good practice - such as providing rent deposits, incentives for landlords, and using capital funds to increase housing stock - have significantly assisted displaced Ukrainians to connect to host communities and integrate into society, including finding paid employment. Our work with reuniting refugee families, detailed in our [Together at Last](#) research⁴ (2022) also

² British Red Cross (2025) [Briefing: Still at risk - Ukrainian homelessness in the UK](#)

³ British Red Cross (2024) [Finding a Safe Home](#)

⁴ British Red Cross (2022) [Together at Last](#)

highlights that housing support before the families arrive significantly assists reuniting families to settle in the UK and provides a more secure basis from which to rebuild family relationships and begin integrating into host communities.

15. The timeframe for being classified as 'threatened with homelessness' is currently too short at 56 days, placing additional pressure on reuniting refugee families. Many report having limited options, and too little time to make informed decisions. A specific issue for reuniting refugee families is that they cannot be considered at risk of homelessness until they arrive in the UK, which leaves most families forced to present as homeless. A key recommendation from all our work on family reunion is that being aware of options before arrival would significantly assist families in the early stages of reuniting, and prevent additional stress.

16. In the case of displaced Ukrainians on Homes for Ukraine, our research also found that a short-term hosting commitment, coupled with a lack of clarity over the length of hosting and the absence of a transition plan into longer-term accommodation, did not sufficiently prepare Ukrainians for independent living, and some faced homelessness risks as a result.
17. Extending the 'threatened with homelessness' timeframe to up to six months would allow families more time to explore stable housing options, reducing the likelihood of homelessness. It would also support greater continuity, particularly for children, by allowing more time to plan and settle.

Early intervention is vital

18. Our work with displaced Ukrainians and reuniting refugee families underlines that early intervention is key to identifying challenges, and is essential as a basis for integration and rebuilding relationships as well as building independent new lives in the UK. Specifically, early intervention with families and individuals threatened with homelessness is effective in preventing long term reliance on emergency accommodation, or repeated presentations as homeless to the local authority. We welcome a focus on early intervention in the Bill; to ensure this is meaningful, it is important to integrate lived experience evidence on effective approaches and timescales into further regulation and guidance.

19. Planned prevention strategies are more effective than reactive responses. They provide applicants with clear pathways to support and build trust and confidence in the system. This is particularly important for those navigating complex housing systems for the first time.
20. For people whose first language is not English, understanding housing information and navigating services can be a major barrier. Providing access to interpretation to ensure clear and accessible information is essential to ensure fair access and informed decision-making. The resource implications of providing interpretation must be fully integrated into local authority service planning and budgeting to ensure equitable access for all.
21. In the Ukraine response, speaking with professional stakeholders in 'Finding a Safe Home', we found that the provision of extra contingency funding for emergency accommodation, as well as resourcing local authorities with dedicated teams to support Ukrainians on the Homes for Ukraine scheme facing relationships breakdown with hosts, were useful in addressing homelessness risks and reducing overall time spent in emergency accommodation. More widely, we found that there is a benefit to ensuring the provision of consistent funding support to local authorities across schemes, including support for emergency accommodation to prevent displaced people experiencing homelessness.
22. Early intervention brings major benefits in that it reduces physical and mental health impacts on those threatened with homelessness, and enables individuals to focus on addressing other areas of their lives, including accessing English classes, supporting children's education and, indeed, seeking skills and/or employment.

Housing support prior to arrival is key for reuniting refugee families

23. Findings from [Together at Last](#) and insights from our ongoing service delivery highlight challenges arising from housing duties only beginning as families arrive in the UK. On arrival, the majority of reunited families struggle to access suitable accommodation – our research found that across the UK only around one in five of the families we supported between 2019 and 2022 were able to move into their sponsor's pre-existing accommodation on arrival.
24. In many cases, families face destitution on arrival and must present as homeless, and sometimes wait for a full day to access emergency accommodation. Frequently, families spend extensive periods in temporary accommodation. This is stressful for families that have been separated for

many years and are not able to enjoy their reunion and negatively impacts their relationships and integration and places additional strain on local authorities.

25. The Home Office does now notify local authorities when a refugee visa is granted, meaning they can plan for their arrival. It's crucial that local authorities, together with the refugee waiting to be reunited with their family, work together to plan for their arrival. This helps children access education quicker, helping them to build friendships and integrate, as well as supports their long-term development. The timeframe for children to start school from reuniting with their refugee parent or guardian in Wales varies significantly by location, but at the time of our Together at Last research (2022) stood at 52 days in Wales.
26. Findings from the [Finding a Safe Home](#) show that displaced Ukrainians' experience of initial accommodation through the super sponsor scheme was mixed. Our research showed that while the provision of welcome accommodation often met immediate need, longer stays in these settings and frequent moves were detrimental to wellbeing. We welcome the provision made for renovating void properties under the Transitional Accommodation Capital Funding Programme (TACP) and efforts to support Ukrainians into longer-term housing.
27. Continuous investment in funding models such as the TACP that provide good quality, longer-term and affordable housing should therefore be continued. In addition, local authorities should have the power to use the fund flexibly across refugee responses and be supported with funding for its implementation.

Collaboration across sectors supports positive outcomes

28. Our research highlights the value both displaced Ukrainians and reuniting refugee families place on support with understanding and navigating public services, which for the vast majority are unfamiliar and complex. This complexity can lead to significant delays in settling in - for example, registering for a GP or enrolling children in school - since each process typically requires separate documentation.
29. Strong collaboration between local authorities and the VCS can help reduce these delays, enable families to begin rebuilding their lives more quickly and confidently and help ensure housing and support services are better coordinated. VCS organisations can also assist with housing, and in particular housing support. In addition, a consistent contact within services is helpful for

building trust and supporting integration. Collaboration with VCS organisations can assist in building this, and has been demonstrated for example in the [Together at Last](#) research, where respondents frequently noted that Red Cross support workers were vital in supporting them understand official information, from official letters to processes accessing and registering with services.

Services and duties need to be resourced

30. The wider context to all our recent work and research with service users includes resourcing of local authority housing services and the availability of suitable accommodation, both now and in the medium and long term. This includes consideration of long term housing demand, and taking account of the need for initial as well as long term accommodation for displaced communities.
31. A key finding across our research is that many people are moved several times before finding sustainable accommodation, and occasionally are threatened with homelessness during the process. Universally, this is associated with significant stress, and creates difficulties with integration. In some cases, lack of suitable housing affects health and wellbeing, in particular mental health.
32. For reuniting refugee families, for example, this may involve challenges in rebuilding relationships, following a period of long separation. Families may also be reluctant to enrol children in school and engage in English classes or other activities, as they feel this would be disrupted by a potential further move. Others report that the lack of certainty contributes to feeling unsafe. Ensuring a sustainable supply of housing is vital to prevent this occurring so frequently in the future.
33. Many Ukrainians who were housed in initial 'welcome accommodation' as part of the super sponsor scheme in Wales experienced multiple moves between different temporary settings, which were in part due to the unexpected levels of demand for contingency accommodation and the limited availability of temporary rooms in hotels and B&Bs for longer stays in the initial phase of the response. These moves created significant stress and uncertainty for Ukrainians, partly because it uprooted them from the communities in which they had started to rebuild their lives.
34. Uncertainty about expected timeframes for being moved from temporary accommodation, and how often this was likely to happen, also affected Ukrainians' perception of their own autonomy and independence. A key

learning is to ensure that there is clear, accessible and regular communication with displaced people in temporary accommodation about their length of stay, as well as limit multiple moves between temporary accommodation settings, as much as possible.

35. While we recognise the current economic context of administrations across the UK is challenging, it is essential that long term action on homelessness and homelessness prevention is appropriately resourced and responsible authorities have clear remits and guidance on discharging duties. There is also a need to continue to invest in good quality social and affordable housing stock to address the housing needs of displaced people across safe routes. This is particularly vital to building and maintaining the confidence of all communities, who share an interest in minimising not only homelessness, but its wider social and economic impacts.