

SP 30

Blaenoriaethau ar gyfer y Pwyllgor Cydraddoldeb,
Llywodraeth Leol a Chymunedau
Priorities for the Equality,
Local Government and Communities Committee
Ymateb gan: Shelter Cymru
Response from: Shelter Cymru

Our vision

Everyone in Wales should have a decent and affordable home: it is the foundation for the health and well-being of people and communities.

Mission

Shelter Cymru's mission is to improve people's lives through our advice and support services and through training, education and information work. Through our policy, research, campaigning and lobbying, we will help overcome the barriers that stand in the way of people in Wales having a decent affordable home.

Values

- Be independent and not compromised in any aspect of our work with people in housing need.
- Work as equals with people in housing need, respect their needs, and help them to take control of their lives.
- Constructively challenge to ensure people are properly assisted and to improve good practice.

Introduction

Shelter Cymru welcomes the opportunity to respond to this consultation. In our view the Committee has already identified a number of important priority areas, on which we have the following comments.

In-work poverty

Last year more than a quarter (27 per cent) of our clients were in work at the time they sought help from us. The biggest problems people experienced were homelessness (15 per cent), rent arrears (11 per cent), other financial issues (10 per cent) and landlord possession action (8 per cent).

People in work are often less aware of their entitlements and less likely to know where to seek advice. In recognition of this we currently deliver a service called *Work It Out*, which aims to take housing and debt advice into workplaces. In January we will be launching a campaign to promote our new *Housing Help* app to people in work.

It would be useful for the Committee to enquire what kind of services are available that specifically seek to tackle in-work poverty.

Poverty and welfare reform

Welfare reform has had, and continues to have, a significant impact on the people of Wales. In our view, it would make sense to avoid duplicating [work carried out by the Public Accounts Committee](#) in the last term, which looked in detail at the impacts of welfare reform and how public bodies have responded.

An issue that we feel is worthy of further attention is the extent to which decisions on non-devolved matters such as welfare benefits have the power to undermine progress towards devolved policy aims; whether the relationship between Cardiff and Westminster is currently effective in handling this; and whether it would be appropriate for the Welsh Government to push for greater devolution over Housing Benefit in particular.

Wales receives just over £1 billion in Housing Benefit every year, an amount that has doubled in the last 15 years, the growth partly fuelled by the system itself that pushes up rent levels via demand-side subsidy. Giving Wales responsibility for Housing Benefit would effectively 'close the loop' of housing policy by making the Welsh Government fully responsible for the effects of policies that increase or decrease the Housing Benefit bill – foremost among these being the supply of affordable homes. With the Scottish Government establishing a new [benefits agency](#) to take on administration of aspects of social security, we would welcome a debate on whether the Welsh Government should push for more and what the benefits would be.

Post-legislative scrutiny of new homelessness duties under Housing (Wales) Act 2014

Since the introduction of Part 2 of the Housing (Wales) Act 2014 we have taken the lead in scrutinising how effectively services have adapted to the new legislation and associated culture change.

Our [recent blog post](#) on the homelessness statistics highlights good progress particularly in the success of the new prevention duty. There are however some significant differences between authorities, with the highest prevention success rate nearly twice as high as the lowest.

Some questions we feel are worthy of scrutiny include:

- The extent to which local authorities have bought into homelessness prevention at strategic level, including funding levels for Housing Options teams and working arrangements with other local government departments such as Housing Benefit

- Whether funding for agencies involved in homelessness prevention is adequate to enable delivery of the Act – last year prevention funds were cut by [8.1 per cent](#) which affected many services including ours
- The effectiveness of homelessness prevention services for prison leavers, now that priority need status has been removed for this group
- The impact on people sleeping rough, and whether more needs to be done to support the rights of rough sleepers in particular around their priority need status
- The extent to which social landlords are supporting or undermining the work of Housing Options by undertaking eviction prevention work and accepting nominations.

We are currently carrying out a qualitative assessment of people's experiences of using homelessness services since the Act came into force. We are anticipating this work to be completed during October and would be happy to share findings with you prior to publication.

Housing supply

We were among the organisations lobbying for an increased affordable housebuilding target, and we strongly welcome the Welsh Government's commitment to double current output over the next Assembly term. It is crucial, however, to ensure that these homes are genuinely affordable for people on low incomes. This, we argue, must rule out houses sold on the open market (including via Help to Buy Wales) or rented at market or near-market prices.

It is also important to ensure that the drive to increase output of affordable homes doesn't preclude us from carrying out other regulation in the sector. For example, we are shortly to publish a piece of work on the role of social landlords in homelessness prevention, which calls for a new set of rent arrears pre-action requirements to ensure that social landlords cannot start eviction proceedings without evidencing that they have first of all addressed any basic issues such as helping with Housing Benefit applications, carrying out support needs assessments and so on. This will relieve pressure on local authority Housing Solutions and other homelessness prevention services including ours. We need to ensure that in the drive to increase quantity of housing, we don't lose sight of the necessity to improve regulation where necessary.

Further suggestions

- Post-legislative scrutiny of Part 1 of the Housing Act – to examine the impact of landlord licensing and identify potential improvements

- Post-legislative scrutiny of the Renting Homes Act – looking in particular at the impact on the private rented sector, and assessing whether more should be done to support private tenants' security of tenure. This would be appropriate for the second half of the term (2019 onwards)
- A review of the private rented sector – looking in broad terms at the range of Welsh legislative and fiscal powers and how they can be used to change the culture of the sector to provide decent, secure, long-term homes and help prevent homelessness. For example, our current [Letting Go](#) campaign is calling on the Welsh Government to ban letting fees to tenants
- Council Tax – the Welsh Government has suggested that it may not be able to continue to plug the gap in Council Tax Support in future years. We are very concerned about the potential impact of this on the poorest and most vulnerable people in Wales. At the same time, it is well known that Council Tax is regressive in nature and disproportionately impacts those least able to pay. Other taxing models exist – such as those based on Land Value Tax – which may be capable of raising adequate local government revenue in a fairer and more progressive way. We would welcome scrutiny of current Welsh Government thinking around Support for Council Tax and more broadly, around the structure of local government taxation.

For more information please contact Jennie Bibbings, Campaigns Manager

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