



A step in the right direction for homeless young people and vulnerable women in Wales

HB 24

National Assembly for Wales

Communities, Equality and Local Government Committee

Housing (Wales) Bill: Stage 1

Response from: Llamau

## **Llamau Response to Welsh Government on the Housing (Wales) Bill**

### **1. Introduction**

Llamau is a registered charity working across Wales with homeless young people and vulnerable women. Llamau was formed 28 years ago in response to a pressing need for



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appropriate and supported accommodation for young people leaving care or young offenders institutes. Since then, Llamau has grown and developed to work with all marginalised groups of young people, including care leavers, offenders, homeless or potentially homeless young people and those with challenging support needs including substance misuse or mental ill health and who have disengaged from mainstream education, training and employment. Llamau also works with women with complex needs, offending and mental health issues as well as women and families fleeing Domestic Abuse. Llamau seeks to resolve immediate homelessness and prevent future homelessness and vulnerability by supporting vulnerable people to gain the skills and confidence they will need to live independently within the community of their choice.

We currently operate a range of services across Wales that work with people who are experiencing homelessness or that help prevent homelessness, these include - supported housing projects, including 24 and non 24 hour supported housing projects (including a specialist project for young offenders), domestic abuse refuges and dispersed units; 3 housing advice projects for young people; family mediation projects that aim, where safe and appropriate, to help young people remain or return home; assertive outreach projects which work with the most disadvantaged 14-19 year olds who are most at risk of becoming homeless; a prevocational training programme that works with the most excluded NEET service users to gain Basic Skills qualifications and become work ready through our own training programme and volunteer and work experience opportunities. We have two YJB Cymru projects researching better outcomes for young people who are homeless. In addition we have two social businesses run with our service users and are currently undertaking a 3 year Knowledge Transfer Programme with Cardiff University which aims to look in detail at the lives of young people who have been homeless and assess the relationship between their characteristics and experiences of homelessness with the aim to better understand the issues they face and provide a toolkit of new and appropriate interventions which will further improve service user outcomes. We welcome the opportunity to respond to this consultation.

## **2. General Principles**

### **a) Compulsory registration and licensing scheme for all private rented sector landlords and letting and management agents**



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Llamau welcomes the introduction of compulsory registration and licensing. Too often we have seen our service users in appalling conditions or being discriminated against.

We believe this measure to be crucial if the private rented sector is to become an attractive and viable option for all. We recognise that improvements have been made in recent years but there are still considerable numbers of landlords, letting agents and managing agents who do not act in the best interest of tenants or prospective tenants. There is still very poor quality accommodation that our most vulnerable citizens end up in where they face exploitation by unscrupulous landlords and others.

The improvements to the private rented sector must include bringing poor quality accommodation up to standard. We therefore fully welcome the proposals to establish a national, mandatory registration and licensing scheme to regulate landlords, letting agents and managing agents.

We would still like to see the relationship between the Third Sector and the PRS strengthened, with social lettings schemes, and the use of Housing Associations as managing agents, implemented across Wales to maximise the impact of the Housing Solutions model. Given the current lack of accommodation it is essential that this relationship is forged to avoid vulnerable people being 'dumped' in the PRS without the support that they need. We have already started to see Housing Associations cherry picking their tenants or demanding that tenants come with additional deposits and rent in advance, something which completely undermines the principle of Social Housing and which discriminates against the most vulnerable and homeless.

We applaud the intention to ensure that support is available to those who need it, whatever tenure live in.

**b) Reform of homelessness law, including placing a stronger duty on local authorities to prevent homelessness and allowing them to use suitable accommodation in the private sector**

Llamau welcomes the intention of the bill to put the prevention of homelessness is at the heart at its heart. We particularly welcome the proposal to extend the definition of



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‘threatened with homelessness’, from 28 days to 56, thus allowing for more prevention work to be carried out. We welcome this extension of the definition as it will allow the young people we support to link in with services earlier and recognises that prevention services, such as our Family Mediation projects, often need more than 28 days to work with families. It will also give people who are threatened with homelessness greater peace of mind to know that they can be given support earlier to help prevent them from becoming homeless. Additionally, Llamau further helps prevent homelessness by running an Agored Cymru qualification with an embedded ICT Essential Skills Wales qualification in Introduction to First Tenancy. This qualification is available to everyone we support and provides them with clear training on their and their landlord’s responsibilities as a tenant, as well as budgeting and being a good neighbour.

We urge any guidance to direct local authorities to using the expertise of the Third Sector who have an excellent track record in homelessness prevention. For example, we urge Welsh Government to look at the excellent examples of a joint statutory/third sector approach in terms of youth homelessness through **Llamau’s** Family Mediation projects as well as our Jigso project in the Vale of Glamorgan and the Basement @33 in Cardiff, where **Llamau** provides the frontline, supportive, holistic assessment service continues to support the young person through the process while the local authorities fulfil the statutory duties where homelessness cannot be prevented.

We acknowledge the need for local authorities to discharge their duty through accessing appropriate accommodation in the private rented sector, particularly when social housing is in such short supply. We also acknowledge that private rented accommodation offers more choice to individuals in looking for accommodation in a location of their choice. However we believe that there are a number of issues which cause barriers for people choosing the private rented sector and that Welsh Government needs to ensure that any legislation takes account of these barriers and puts in place appropriate measures to mitigate them. These issues are:

- **Rent levels** - We would welcome ways that the Welsh Government can put measures in place to ensure that rents are kept affordable so that people on low incomes are not financially penalised for choosing the private rented sector. Improved relationships between housing-related support providers, including Housing Associations, and the PRS, can help work towards ensuring rents become affordable. With increased understanding, private sector landlords could see that their return on investment from their rental income can be better assured by long-term stable tenants on an affordable rent than by high rents and the likelihood of short-term tenancies with multiple and successive evictions for non-payment of rent.



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- **Lack of security of tenure** - The lack of security of tenure is another reason why the private rented sector is currently not seen as a positive alternative to social housing and we urge Welsh Government to consider this issue when the tenancy reform proposals are drawn up. For example, families who have experienced homelessness or who have had to move because of domestic abuse/violence need to have security for their children so that they are not concerned about having to move home and change schools after 12 months.
- **Young People** - Work also needs to be done to breakdown the stereotypes some private sector landlords and agents have against certain sections of the community including, for example, those on benefits, in receipt of support or young people. Young people under the age of 35 can only claim Single Room Rent which means that they often have to share accommodation with strangers. For young people who have been homeless and may have support needs, this can often be a very challenging experience. Private landlords are often particularly reluctant to let accommodation to young people who do not have a proven track record of independent living.
- **Welfare Reform** - The Welfare Benefit Reform changes are already having a significant impact in Wales. Many private sector landlords in Wales and England have recently announced in the media that they will withdraw from letting their accommodation to people claiming benefits once Universal Credit comes into force. Whilst it is unlikely that all landlords will carry out this threat, it does mean that many of the better and more 'professional' landlords are likely to withdraw from this market, leaving people who are reliant on benefits to rent from more unscrupulous landlords.
- **Lack of affordable private rented accommodation** – It is important to note that not all local authorities have large numbers of privately rented accommodation available and thus the change in legislation will not particularly help them to secure additional accommodation.

We do have concerns about the change of priority need for former prisoners as we believe that this will not help re-offending rates and that those who need support should be able to receive it. We do not believe the suggestion asserted in the media that people are deliberately offending in order to secure accommodation and believe that further research should be carried out to establish the exact affect the current legislation has in reducing recidivism rates.



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**c) Duty to provide sites for gypsies and travellers**

We support this proposal as there is a clear and identified need for additional sites as well as significant improvement needed on some existing sites. In order for progress to be made in ensuring this duty is enacted, the Welsh Government needs to provide support to local authorities to support them in improving public perception of these sites because of the significant local opposition that often occurs. For example, we feel that it is vital that the settled community and elected officials are brought on board with plans so that they feel ownership of any plans, as one of the key barriers to the implementation of this proposal is the opposition to the development of new sites from elected members and the settled community.

**d) Standards for local authorities on rents, service charges and quality of accommodation**

We welcome this proposal.

**e) Housing Revenue Account system**

We welcome this proposal.

**f) The power for local authorities power to charge more than the standard rate of council tax on homes empty for over a year**

We welcome this proposal to tackle the issue of empty homes when there is a chronic shortage of appropriate and affordable housing.

**g) Assist provision of housing by Cooperative Housing Associations**

Llamau supports the intent to encourage the growth of co-operative housing in Wales, and we support the development of models that will increase the supply of affordable and social housing and bring new finance into the sector.

However, we feel that people's perceptions, expectations, skills and understanding need to be nurtured in order to make progress in this area. We therefore would still suggest and support the establishment of pilot co-operative housing projects which can help define how this form of housing can be most appropriately used to increase supply, and Llamau will be considering how, if at all, this form of housing tenure could be used to assist our service users and tenants.



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Additionally, Llamau welcomes the intention to ensure that all new legislation appropriately links with and has a positive impact on other legislation without any unintended consequences. For example we welcome the importance of a joint approach with Social Services when working with young people or with families of children who may be deemed 'intentionally homeless'. We also welcome that the Bill states that services must be integrated with the services required under the Social Services and Well Being Act (Wales) 2014 and the proposed Domestic Abuse and Violence Against Women Bill. Recent research by Llamau, as part of a 3 year study with Cardiff University, has shown that 84% of the young people we support have a current mental health condition. We have therefore introduced a Mental Health and Well Being Toolkit to help us to identify those young people who may benefit from additional support around their mental health and well-being.

### **3. Whether there are any unintended consequences arising from the Bill**

The only unintended consequence that we are concerned about is the possible problem that young people may face when homelessness duty is discharged into the private rented sector as mentioned above, i.e. the difficulties young people may face in finding appropriate shared accommodation that does not negatively impact on the progress of their support needs. We would urge the Welsh Government to build in a safety net with this particularly vulnerable client group.

We are also concerned about the implications of further Welfare Benefit Reform in the ability of private rented accommodation being affordable or available for vulnerable client groups.

### **4. The financial implications of the Bill**

With prevention at the heart of the Bill we believe that there needs to be further financial investment into S.180 grant funding for Third Sector organisations, following the current review of these services. The Third Sector is best placed to deliver the best outcomes of homelessness prevention, as evidenced in Llamau's Family Mediation and Advice Services projects across South Wales. However it is important to note that existing S.180 services have not had any inflationary uplift in funding for a number of years. These services save statutory services 100's of thousands of pounds a year, without them homelessness figures would see a sharp increase.



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