



Llywodraeth Cymru
Welsh Government

Consultation Response Form

Your name: Thomas Hollick

Organisation (if applicable): The Wallich

email / telephone number: thomas.hollick@thewallich.net /
07467120098

Your address: The Wallich Cardiff Hub, 18 Park Place, Cardiff, CF10
3DQ

Questions

Q1 Do you agree with the policy of excluding B&B accommodation provided to meet homelessness housing duties from being an occupation contract?

- Yes
 No
 Don't know

Q2 Do you think that B&B accommodation providers are likely to stop providing temporary accommodation to those who are homeless, if the accommodation is subject to an occupation contract?

- Yes
 No
 Don't know

Q3. Does the proposal mitigate the risk of a reduction in the availability of B&B provision as temporary accommodation, due to it otherwise becoming subject to an occupation contract?

- Yes
 No
 Don't know

Q4. Do you consider there to be any additional risks to homeless households directly, or on the wider approach to homelessness prevention as a result of these proposals?

- Yes
 No

Q5. If yes (to Q4), please identify these risks and possible mitigations.

Whilst we understand the reason for the proposed amendments and support the changes in the light of ongoing challenges faced by all local authorities when discharging their homelessness duties, we remain of the view that bed & breakfast
--

style accommodation is not suitable as a long-term form of temporary accommodation for people experiencing homelessness.

This type of accommodation often lacks facilities for cooking, laundry, or internet access, which can have deskilling effects on residents who may need to rely more heavily on support from other services than they might otherwise. Demand for affordable, suitable housing is higher than ever before at the moment, meaning long waits in all sorts of temporary accommodation including bed and breakfasts. These long indeterminate waits can be hugely demoralising for people with nowhere else to go, so it is more important than ever that they receive appropriate, trauma-informed support, including for their physical and mental health.

Whilst previously we have been concerned that there has been insufficient support in place for people spending extended periods in bed and breakfast accommodation, we are now more confident that support is able to be put in place more often, even if that support does not lead to rapid rehousing into permanent accommodation.

The only way to sustainably mitigate the risks of long stays in bed and breakfasts is to significantly increase the number of affordable, high-quality homes that meet the needs of people experiencing homelessness. These could be delivered as social housing or through the PRS, but they must be affordable, energy efficient, and reflective of demand, for example a range of sizes in proportion to the numbers of single people, couples and families currently awaiting rehousing.

Aside from this, the only other short-term mitigation would be to invest further in more purpose-built temporary accommodation, with better facilities than typical bed and breakfasts, however we understand that the Welsh Government's ambition is to move away from temporary accommodation towards Rapid Rehousing and Housing First models, something which we are highly supportive of.

Q6 Do you consider there to be any wider potential risks or adverse effects of the proposal?

Yes

No

Don't know

Please provide details.

There are several risks around the continued use of bed and breakfasts as emergency temporary accommodation. Firstly, there is a very real risk that this becomes just another form of accepted accommodation, which represents backsliding on our ambitions for Rapid Rehousing and a higher standard of support for people experiencing homelessness. We must never fool ourselves into thinking that a lengthy stay in a bed and breakfast means that an experience of homelessness has been resolved. That ongoing sense of insecurity and rootlessness must not be allowed to grow, as it risks people becoming increasingly disillusioned with the system, and perhaps consider more dangerous forms of accommodation such as sofa surfing or rough sleeping.

There are also risks that local authorities may be paying over the odds for poor quality accommodation, simply because they are desperate for additional bed spaces. In some parts of Wales, bed and breakfast owners have effectively changed their business model away from short-term lets for tourism, towards longer-term emergency accommodation paid for with public money. This could ultimately further muddy the waters around what is suitable temporary accommodation, as there are already significant variations in quality across different local authorities. Whilst we are of course very grateful to those business owners who have come forward to offer bed spaces, without whom many more people and families could be facing sleeping on the streets, there is no doubt that this is not sustainable indefinitely on financial grounds.

Finally, there are risks around long stays in bed and breakfasts leading to issues within local communities, particularly where anti-social behaviour or substance use causes heightened anxieties. Whilst our support workers and staff in other similar services across Wales do their best to manage relationships and smooth over tensions before they escalate, these can be highly charged environments with risks of stigmatisation, particularly if police become involved. Evictions and criminalisation following confrontations can have life-changing effects on the people we support, and we will do everything we can to mitigate these risks.

Q7 We would like to know your views on the effects that the proposal would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We have no reason to believe the proposal will have any particular effects on the Welsh language.

Q8 Please also explain how you believe the proposal could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We don't believe the proposals require amending further with regards to the Welsh language.

Q9 We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Nothing further to add at this time.