



promoting equality in housing
hybu cydraddoldeb ym maes tai

The experiences of homelessness of people with protected characteristics in Wales

March 2023



Ariennir gan
Lywodraeth Cymru
Funded by
Welsh Government



Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. Our vision is a “Wales where everyone has the right to a good home.” We operate a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector. We are also part of a coalition called “[Back the Bill](#)”, which seeks to establish the legal right to adequate housing for **all citizens** in Wales.

For further information visit: www.taipawb.org

Charity registration no. 1110078

Company No. 5282554

Foreword

Tai Pawb would like to thank participants for their time and honesty in sharing their experiences of homelessness. We would also like to thank staff at our research partners Action for Elders, Disability Advice Project, Gypsies, and Travellers Wales, Home4you, Mela Cymru, and Women Connect First for their work in undertaking interviews and Focus Groups.

Executive Summary

The Welsh Government is seeking to make homelessness rare, brief and unrepeated.

As part of this, it is reviewing housing and homelessness laws with a renewed focus on prevention and rapid rehousing. To ensure the voices and experiences of people with protected characteristics are included in this process, the Welsh Government commissioned Tai Pawb to capture the experiences of homelessness of people with protected characteristics. As part of this research, we have engaged with:

- Asylum Seekers
- Refugees
- Disabled people
- Black and minoritized communities
- Gypsies and Travellers
- Older People
- LGBTQ+ people

This report will present findings from each of these groups, before concluding with a short section on points to consider across all groups.

The key themes identified under each group included:

Disabled people:

- The system not being able to manage the situations of disabled people
- Disability not a prime consideration
- Lack of appropriate properties and knowledge of properties

Gypsies and Travellers:

- Apparent lack of compassion
- Lack of suitable accommodation
- Succession
- Understanding the system

Older people:

- The council responses complicated by age
- Lack of appropriate accommodation

Asylum Seekers and Refugees

- Lack of appropriate accommodation (both temporary and permanent)
- Failure to prevent homelessness
- Inability to work

Black and minoritized communities

- Communication with the council
- Unsuitable Temporary Accommodation
- Poor living conditions and bad landlords
- Domestic abuse and cultural challenges

LGBTQ+

- Lack of data collection
- Experience of Temporary Accommodation
- Specific risks associated with sofa surfing
- Challenges with current interpretation of local connection rules

Across all groups, there were also consistent threads of:

- The system or council staff not listening or understanding, and the need for advocacy from an external body to positively resolve the situation (i.e. charity).
- Lack of flexibility in the law and/or services to manage nuances identified with some of the circumstances.

In the final section of the report, we pose a number of considerations for how Housing law and services in Wales may better manage the experiences identified in this report. In particular, we highlight the need for the law and services to better meet the needs of people with protected characteristics, and that it will not be possible to end homelessness without this.

More specifically, the following themes for consideration were identified:

- 1) People with protected characteristics appear to have additional challenges associated with homelessness, such as:
 - Having difficulty in getting their situation resolved or understood.
 - Facing barriers advocating for themselves or providing their own evidence which could improve their situation.
 - Not having enough information collected which could help their situation be better understood or managed.
 - Being reliant on external agencies for support in resolving their issues.
- 2) While the current definition of homelessness is broad, existing law and services could do more to capture all forms of homelessness. For people with protected characteristics who may be experiencing homelessness in certain ways, this may mean;
 - The culture that implements services and the law that underpins them may not be fully understanding of the needs of certain groups.
 - The system may not have the flexibility to deal with some of the circumstances people with protected characteristics are facing, in particular the complexities and nuances associated with intersectionality.
 - Within a highly pressurised system, the needs of these communities may be missed.
 - There are indications from this research that 'hidden homelessness' may be higher amongst some participant groups, thus acting as a challenge to ending all forms of it.
- 3) Specific issues around Temporary Accommodation include:
 - A lack of culturally specific appropriate services and accommodation for multiple groups.
 - People are not presenting as homeless and/or not accessing Temporary Accommodation as it does not meet their needs.
 - These factors may be contributing to hidden homelessness.
- 4) To build on existing law, there may be opportunities to review:

- Consideration of protected characteristics and the ongoing role of priority need.
 - How local connection rules seem to be affecting allocations of properties and who that may be affecting negatively.
 - Given the emphasis on trauma and gender-informed services, what a trauma and gender-informed housing law may look like?
- 5) Under the auspices of ending homelessness, reviewing overlapping legislation to understand:
- Can homelessness be ended without reform of immigration law?
 - How could the welfare system prevent homelessness?
 - Are there opportunities for alignment with existing housing law in Wales such as the Renting Homes (Wales) Act?
 - How will changes around the Police, Crime, Sentencing and Courts Act affect homelessness in Wales?
 - Could wider duties on other bodies (especially public bodies) help prevent homelessness?
 - How can the law contribute towards generating sufficient housing supply that prevents homelessness and can manage a small degree of it?

Introduction

In 2021, as part of the Programme for Government, the Welsh Government committed to 'Reform housing law and implement the Homelessness Action Group's recommendation to fundamentally reform homelessness services to focus on prevention and rapid rehousing.' To support this process, the Welsh Government convened an expert panel to review existing housing and homelessness law and make recommendations ahead of a White Paper. To ensure people's experiences of homelessness inform these recommendations, the Welsh Government has worked with partners including Cymorth Cymru, Children in Wales and Tai Pawb.

This report seeks to capture the experiences of homelessness of people with protected characteristics. By homelessness, we are using the Welsh Government's definition;

'Homelessness is where a person lacks accommodation or where their tenure is not secure. Rough sleeping is the most visible and acute end of the homelessness spectrum, but homelessness includes anyone who has no accommodation, cannot gain access to their accommodation or where it is not reasonable for them to continue to occupy accommodation. This would include overcrowding, 'sofa surfing,' victims of abuse and many more scenarios. A person is also homeless if their accommodation is a moveable structure and there is no place where it can be placed.'

Scope of research

The Equality Act 2010 identifies nine categories which gives people legal protection against discrimination. Rather than a single community of people, this should be considered a broad community(s) of people who have different challenges and experiences, and others may have more than one protected characteristic and face additional barriers through this intersectionality.

In designing this research, a broad scope of groups could have been selected to gather experiences. As such, we have sought to amplify the voices of people whose experiences may be more nuanced or hidden due to their protected characteristic, the law or the way in which the two interact. This research specifically focused on:

- Asylum Seekers
- Refugees
- Disabled people
- Black and minoritized communities
- Gypsies and Travellers
- Older People
- LGBTQ+ people

While women were not researched as a specific group, gender-based experiences were raised by participants in particular through the research focused on Black and minoritized communities and Gypsies and Travellers.

Methodology

This research adopted a qualitative approach using focus groups and one-to-one, semi-structured interviews reflecting based on participants' preferences, recognising any barriers that may be in place around sharing experiences.

Recognising time constraints and potential challenges associated with engaging people with lived experience, we worked with partner organisations already in contact with potential participants. These organisations identified, interviewed, and provided the data to Tai Pawb. The exception for this was in relation to research with refugees and asylum seekers where existing Tai Pawb staff working in this field undertook research with the support of Home4U. The following organisations partnered with us in this way:

Organisation	Participant Group
Action for Elders	Older people
Disability Advice Project	Disabled people
Gypsies and Travellers Wales	Gypsies and Travellers
Tai Pawb	Refugees
Tai Pawb/Home4U	Asylum Seekers
Women Connect First/Mela Cymru	Black and Minoritized Communities

To support the above we developed an online qualitative survey distributed through social media, newsletters and through relevant stakeholders. The questions asked through this survey were broadly the same as both the interviews and focus groups and aimed to capture additional information.

All names quoted in case studies have been changed to protect the anonymity of participants.

Participant numbers

A total of thirty-six people participated in this research across the interviews and focus groups and is broken down as follows:

Interview/Focus Groups

Participant Group	Numbers
Older people	2
Disabled people	3
Gypsies and Travellers	5
Refugees	8
Asylum Seekers	9
Black and Minoritized Communities	9

The Interview template can be found [here](#).

The Focus Group template can be found [here](#).

Survey

A total of twenty people participated in the online survey across all categories. As would be expected, some participants did not disclose which group they identified with, and others identified with more than one protected characteristic.

Case studies

Where possible, case studies have been included to help amplify people's experiences. Some of these may be considered distressing, so we recommend the reader approaches these with caution.

Existing research

In 2022, Tai Pawb undertook research into LGBTQ+ experiences of homelessness in Gwent, and the experiences of living in Wales of asylum seekers as part of the Independent Constitutional Commission on the future of Wales. Given the relevance of this research, we used experiences and stories from it to broaden the range of groups with protected characteristics spoken to.

Challenges and limitations

This research faced a number of challenges, especially around engaging people who had experienced homelessness and who were prepared to share their stories. Working with partners who had established relationships with participants mitigated this to a degree, but engaging participants remained a challenge across all participant groups. Partly due to timescales and therefore limited capacity to identify participants and make the necessary arrangements. While this approach strengthened the research, it did also mean that the field work was undertaken by different groups in different circumstances. As such, there is variation in how sections of the report are presented (i.e., number of direct quotes).

An original intention was to undertake research into the experiences of EU/EEA Migrants. However, despite engaging a number of groups this was not possible. While there were three responses to the online survey by people from this background, we considered this did not provide sufficient evidence when compared with the rest of the research contained in this report. If further research were to be undertaken to support the development of the White Paper, it is recommended the views and experiences of this group are prioritised.

While this research aimed to gather and present examples of lived experiences of diverse groups, the small scale of the research means that it is not

representative of wider homelessness experiences of these groups. Therefore, the themes and findings should be treated with caution. While the law is consistent throughout Wales, its application and access to services may differ. For instance, experiences relating to people with protected characteristics living in rural areas.

Disabled people

Disabled people face a lower employment rate and often work for less money, while also facing additional costs due to their impairment. This contributes to their risk of homelessness. An evaluation by Crisis of their Sky Light project showed 39% of people they supported were disabled. Research also shows there are a large number of disabled people in Temporary Accommodation. Previous research by Tai Pawb identified significant issues with the effectiveness of allocation systems in relation to disability.

Experiences of homelessness may also be hidden and more nuanced amongst disabled people. The conversations undertaken by the Disability Advice Project highlighted experiences of homelessness, which present specific and general challenges to being appropriately housed. They also highlighted the challenges in the existing law and services in relation to dealing with disabled people.

Case Study – Lack of support & consideration of income vs. disability

Anna has brittle bones and experiences chronic pain. She lived with her long-term partner, but while recuperating from a leg break in hospital, he decided to separate and sell the family home. On hospital discharge, **no help was offered** and there was no option other than to move in with her daughter. Anna spent the next 18 months sleeping on a sofa. During this period, while the council staff were understanding of her problem, they were unable to help. Anna ‘bid’ for plenty of social lets but was unsuccessful. The organisation marketing these properties (not the council) was described as “**very unhelpful,**” with an attitude of “**don’t bother us**” when contacting them. No suitable properties were available on the private rental market leading to Air BnB being considered as a last resort. When Anna’s original family home sold, rather than improve her situation, it made it worse as the money she received

was considered to be “significant,” lowering the banding at which Anna was placed at in the social housing waiting list. Aged 70, with a sole income of benefits, Anna was unable to get a mortgage or afford to buy a suitable property. Rather than her impairment, the funds from the sale were considered more important to her housing situation which Anna felt was like “indirect discrimination.” Eventually, with the support of a local charity and intervention of a Head of Housing, Anna moved into a social let. Reflecting on her experiences, Anna felt “if someone had listened and looked at the bigger picture, perhaps a better understanding would have resulted in a quicker process.”

Lack of awareness of health conditions & their impact

All participants interviewed reported issues around data capture by local authorities. They felt that the forms used on referral were the same for disabled as non-disabled people. Not capturing information around how they were disabled, led to frustrations in the system and an overall feeling of not having their case fully understood or listened too. This was compounded by instances where independent occupational therapist (OT) reports were felt to have been ignored by the council. As well as preventing people from advocating for themselves, this meant there was less understanding of a person’s circumstances. In one instance, a council openly ignored a report as the only OT reports acceptable to them were those they commissioned.

Lack of appropriate knowledge and data of properties

A lack of appropriate data on the accessibility level of properties meant in one instance a home previously discounted by staff at a housing association was actually suitable. Better mandatory data could help ensure more appropriate provision of accommodation in the present but also better planning for accommodation that matches local needs in the future. A key theme across all participants’ experiences was the impact that the lack of appropriate accommodation across all tenures had on their circumstances. This combination of a lack of data and supply seemingly prolonged experiences of homelessness and people living in inadequate accommodation.

Case study – Challenges leaving the family home

Jayne has cerebral palsy and uses a wheelchair every day. She is 34 years old and has always lived with her parents. For a long time, Jayne has wanted to leave the family home to have more independence. Jayne approached Housing Options¹ and the Temporary Accommodation team, but neither could help. When an application was made, she was placed on the lowest banding of priority, and was only raised to the middle band following an **intervention from her doctor**. Jayne's circumstances were made more precarious when the family bread winner lost his job. Her parents could not afford to maintain the house which had been specially adapted or purchase a similar property that met her needs. Eventually, when her parents were forced to hand her **"notice"** from the family home, Jayne was raised to the top category. Jayne visited **all potential Temporary Accommodation options**, even when it was known the accommodation was unsuitable for her needs before she visited. While Jayne did not feel she was discriminated against, she did think both the council and housing association **"weren't listening"** and **"they didn't do their job"** and assumed because she had cerebral palsy, she couldn't do anything. Jayne obtained an independent Occupational Therapist report and was **"convinced"** this was ignored and that it was only persistent contact with council staff that made the difference when eventually a social let was found. While Jayne has settled into her new home, she has had to change her welfare benefits from Tax Credits to Universal Credit, which is taking a long time, and in the meantime is out of pocket by £350 per month.

The priority of other factors

All research participants expressed frustration at the system and a lack of understanding. In particular, that they were disabled was not given enough of a priority over other factors. Instead, when parents' circumstances or individuals' financial situations changed, these appeared more important, even though this did not materially change their situation or what they required. One participant talked about being on the waiting list for social housing for a long time (at least 13 years) and living in multiple properties which were not suitable and, in some instances, causing accidents. Despite regular contact and

¹ Housing Options are a team based in every council in Wales who provide support and advice to any at risk of or experiencing homelessness.

bidding for properties, it was only when she turned 60 that her situation changed, and a property became available. This left her feeling her situation had only resolved itself because “they had ticked more than one box.”

Social Services and Well-being (Wales) Act 2014

The Social Services and Well-being (Wales) Act 2014 [“SSWBA”] provides a legal for improving the well-being of people who require care and support, and carers, for transforming social services in Wales. During this research, its applicability in relation to homelessness and disabled people was raised by the Expert Panel. Discussions with the Disability Advice Project identified in all three cases, care, and support for each disabled person (and their families) was provided by Third Sector organisations or other family members. As each person did not rely on 'Social Workers' or other professionals on a day-to-day basis, none of them had thought to engage with any of the people working under the SSWBA to help resolve their individual housing issues.

Further analysis of the Act by the Disability Advice Project identified the following:

Statement from the Act	Comment
A lack of reference to homelessness within the SSWBA	As “homelessness” is not explicitly referred to in the SSWBA, the immediate applicability of the SSWBA to homelessness and the needs of disabled people is not obvious.
The introduction to the SSWBA (clause 1 (3)(h) “requires local authorities to establish and maintain registers of sight-impaired, hearing-impaired and other disabled people”	It is not clear that this is carried out to include all disabled people. Even if they know of such a requirement, they would be unsure about any benefit they would gain through being on such a register. Clause 18, when considering the register does not specifically include housing even though this is a key determinant of the quality of life of everyone.

Under clause 15(2)(d), local authorities must arrange for the provision of a range of services which will minimise the effect on disabled people of barriers faced.	Not clear if such services include accommodation in the event, or possibility, of homelessness.
In the majority of places within the SSWBA (e.g., clauses 40, 42, 43, 81), the word “disabled” is followed by the word “child”.	There are many more disabled adults than there are disabled children. The SSWBA is therefore not seen as having relevance when considering homelessness for disabled adults. While support is available for care and support needs, this may not be obvious the housing sector or necessary in some cases.

There are also Regulations that are referred to within the Act.

Regulation and requirement	Comment
“Care and Support (Assessment)(Wales) Regulations 2015”: This considers the duties of local authorities to assess adult’s, children’s and carer’s needs for care and support.	Such care and support do not explicitly extend to the provision of housing in the case of homelessness or potential homelessness. The word “homeless” does not appear in these Regulations.
“Care and Support (Choice of Accommodation) (Wales) Regulations 2015”: Authorities may meet a person’s care and support needs by providing accommodation including preferred accommodation”	The issue of costs which a council is able or willing to meet would restrict the acceptability of any accommodation for long-term residence by disabled people. The word “homeless” does not appear in these Regulations.

Gypsies and Travellers

Last year Welsh Government research into ethnicity and overcrowding highlighted the extent of overcrowding within Gypsy, Roma and Traveller communities. A recent Senedd inquiry identified a lack of suitable supply of accommodation, with sites “in desperate need of repair”, lacking basic facilities, often placed away from amenities and next to busy A roads. Domestic abuse rates, which can contribute toward homelessness, can also be higher amongst Gypsy, Roma and Travellers.

Section 101 of the Housing (Wales) Act 2014 requires local authorities to carry out an assessment of the accommodation needs of Gypsies and Travellers residing in or resorting to their area. Based on Senedd research, evidence has found this duty is being met inconsistently. The recent Police, Crime, Sentencing and Courts Act also risks confrontation between traveller communities and the law when there is a lack of suitable accommodation. Recognising this, the Anti-racist Wales Action Plan advocates, “that safe, culturally appropriate accommodation is necessary in order for individuals to flourish in other parts of their lives and to address the lack of site provision and poor quality of Gypsy and Traveller accommodation in Wales.”

It is against this backdrop that Gypsies and Travellers Wales spoke to participants about their experiences of homelessness.

Case study – Lack of compassion and appropriate Temporary Accommodation

Kathleen is a mother with six children aged between 9 months and 9 years old. She previously lived on a Traveller site with the children’s father. Kathleen was a **victim of domestic abuse** from the children’s father and was kicked out of her home. There was no spare plot on the site Kathleen was living on, which also contained most of her partner’s family, so living there was very difficult.

On contacting Housing Options out of hours team, Kathleen was **told she had too many children** and that she needed to find somewhere for the children to go or Social Services would need to get involved. While a space for her was offered at an emergency shelter, this would have meant **losing her children, so she rejected the offer**. Kathleen and her children were eventually offered a hostel place, but this proved to be unsuitable as there were people openly doing drugs. At this point, Kathleen was told by Housing options to stop ringing

(she was calling twice a day because she was desperate) and they told her they had nowhere to put her because she had six children. This made Kathleen **feel “really bad”** and again she was told **her children could be taken off** her if she had nowhere to house them. To make matters worse, different advisers were providing different information when she called the advice line. Finally, Kathleen was offered **Temporary Accommodation in a hostel** where she and the family are happy, welcoming the staff support and the activities provided for the children.

Reflecting on the process, Kathleen felt attitudes at the council changed when she disclosed where **she used to live** (a Traveller site) and was then treated differently.

Experiences of Temporary Accommodation

Experiences of Temporary Accommodation were mixed amongst participants. Some refused Temporary Accommodation based in hostels because they would not meet their needs; “I am a Gypsy and have lived on a caravan site all my life.” Others had positive experiences in some Temporary Accommodation settings due to the support available, including activities for children. A further challenge for more than one of the participants was accessing accommodation due to the size of their family. A lack of larger sized Temporary Accommodation properties appears to have prolonged homelessness in these instances. A lack of culturally appropriate Temporary Accommodation (i.e., accommodation that allows a Traveller to live in a trailer rather than in a traditional bricks and mortar house) may also have prolonged experiences of homelessness and more broadly be a cause of hidden homelessness.

On becoming homeless, one participant was placed in a hotel with his dog, in the countryside, where he felt comfortable. However, with no explanation he was moved to somewhere he described as a “bail hostel” – where he was unable to keep his dog, had a small room with no windows and the kitchen closed at 8pm. This triggered long-standing PTSD. Eventually, on gaining the support from the Mental Health Support Team and Gypsies and Travellers Wales, the participant relocated to the previous hotel.

On reflection, he felt the council “didn’t consider my needs or what was suitable, they also didn’t consider my mental health problems.” The situation

was made worse because he was aware that a non-traveller was placed in a static caravan when this option was not made available to him.

Confusion around succession

Succession of plots was raised as a contributory factor to homelessness. One participant had lived on her mother's pitch her entire life. She has three children aged 2-6 and a husband with cerebral palsy and been on the waiting list for a plot there for 8 years. The participant had deliberately never accessed homelessness support services as she wanted to stay on the site she had always lived on. Last summer, her grandmother (who occupied the plot opposite her mother) died, and while she thought she would get the plot, was told by the council it would go to other people who were registered homeless. The participant's uncle was also living on the plot, hoped he could continue to live with her family there, but this was rejected by the council. With nowhere to place her caravan, the participant went travelling but returned home as she missed her family and could not find anywhere to stay. She is now on her mother's plot (without permission), is unable to open her windows because the caravans are so close and is being reported to the warden. In her words, "I don't have as many options to me as settled people because I would not accept traditional housing... I am currently homeless from home."

Failure to be heard

There was a general feeling of dissatisfaction in the way councils were dealing with situations for the majority of participants. Some further identified better accommodation solutions were achieved and more quickly when independent or advocacy organisations got involved. It is unclear whether this was coincidence or a change in attitude. However, some participants reflected that either their voices or needs were not heard or that they are being treated fairly under the current system.

The Police, Crime, Sentencing and Courts Act

[The Police, Crime, Sentencing and Courts Act](#) has brought about new powers criminalising trespass and allowing the police to confiscate vehicles (home) if they are residing or intend to reside on private land. Some participants raised the challenges this Act is already presenting to them. One reflected this law meant "my family is not able to travel in the way we used to" and they have to

stop on family's land (private sites, houses or outside council plots). While it is beyond the scope of this research to investigate the impact of this Act, it is worthwhile highlighting how this law may potentially lead to increases in homelessness amongst the Gypsy, Roma, and Traveller communities.

Consideration of culturally appropriate homes

Across all participants with whom we spoke, unsurprisingly there was no one solution to resolve their situation. While there was a general aversion to “bricks and mortar,” opinions ranged from living anywhere safe so children can grow up normally, through to a preference to live on an existing traveller site where there was a family connection or have more space and the ability to roam and have a connection with the countryside. Given the focus within the Anti-Racist Wales Action Plan, it is worth highlighting this in relation to any future changes in the law and what can be deemed appropriate. Further engagement with Gypsy, Roma and Traveller communities may help understand this better.

Older People

The Older People's Commissioner for Wales State of the Nation 2021 report suggests 20% of older people in Wales live in income poverty, with a 98% increase in Wales of people over 60 receiving Universal Credit since the pandemic. While not available for Wales, comparable research from England states that over 2 million older people live in non-decent housing. Meanwhile, the number of older people living in the private rental sector is growing, creating challenges for ensuring suitable homes.

Action for Elders undertook a workshop and interviews to research these experiences of homelessness. Engagement was particularly challenging for this cohort, and as participant numbers are low, both participants interviewed are presented as case studies. The workshop engaged people currently supported by Action for Elders and focused specifically on issues for prison leavers.

Case Study – Unsafe home and bad landlord

Eva rented a property in the private rental sector which was in an **increasingly poor state of repair** and starting to have a significant negative **impact on her physical and mental health**. While issues were reported to the landlord, he ignored the individual's concerns, and **became aggressive** when challenged by family and friends. The family encouraged Eva to approach the council. However, the **council was not supportive** and instead put the onus on the individual to resolve their issues with the landlord or seek alternate private rentals. Both of these options seemed unlikely due to the **attitude of the landlord** and **lack of alternative properties available locally**. As Eva was deemed to have accommodation, she was advised she was **not considered homeless** and therefore not eligible for any social housing, scoring very lowly on their points system. No **Temporary Accommodation** was offered or any alternatives that were feasible explored for the individual, though given her age and physical limitations, hostel or bed and breakfast accommodation would have been totally unsuitable. It took **10 years** of living in totally unsuitable, ill maintained (dangerous and uninhabitable) accommodation, significant physical and mental health issues including suicidal ideation before, with the advocacy of a local politician, Eva was rehoused in a social property.

Case study – Domestic Abuse victim with nowhere to go

Phyllis is a domestic abuse survivor who was **abused** by her long-term partner for a number of years. When she approached the council for support, **they were unsure** what they would be able to do to accommodate her and could not provide any emergency accommodation for her. Women's Aid accommodation was available, but it was **inaccessible and unsuitable** for her needs. Phyllis felt the accommodation was **designed for younger women** and children, was crowded and noisy, and had multiple stairs that she could not manage. Eventually, **support was offered by Age Connect** who were able to help Phyllis to **access suitable accommodation**.

The challenges experienced by ex-offenders

Action for Elders also spoke to a group of older prison leavers around their experiences of homelessness, relating to their age and also status. The following issues were raised:

- Some prisoners may be prohibited from returning to the area they previously lived in, meaning other councils have to be contacted in the hope one will accept them.
- If the prisoner has any cognitive or physical impairments requiring support to live independently, councils are unlikely to be able to accommodate them. Care/Nursing homes may also not accept offenders convicted of certain crimes, including violence or sexual offences.
- If the prisoner is disabled and require adapted accommodation, the council is unlikely to be able or willing to accommodate them, due to a shortage of suitable accessible stock.
- If the prisoner needs a social care package from the council to enable them to live independently if/when suitable accommodation becomes available, getting the individuals' needs assessed and a package of care put in place can be problematic and the timescales involved are routinely very drawn out.
- Hostels and Bed and Breakfast accommodation used routinely to house prisoners on parole or after release are generally unsuitable, inaccessible, and unsafe for older prisoners. In addition, dependent on the offence, the older prisoner may not be assessed as safe to access the accommodation due to other residents.

Refugees and Asylum Seekers

Tai Pawb's [research](#) to support the constitutional future of Wales identified common experiences of homelessness for refugees, with all five focus group participants having been made homeless at some point. Official figures are limited for Wales, but a Parliamentary [briefing](#) from England in 2019 identified on one sample night over the winter of 2017/18 that 48 of 169 people requiring emergency accommodation were refugees. [Research](#) undertaken by The Refugee Council found that of 54 refugees interviewed, none had found somewhere to live by the time they had left accommodation.

While refugees and asylum seekers face different obstacles, including around recourse to public funding, our conversations identified their experiences were similar, with people often at a different point on the same journey. Therefore, for the purposes of this report these two groups will be presented together.

Case study – Lack of appropriate accommodation and compassion

Abu arrived in the UK in 2015 to claim asylum, having spent 2 years prior to that at a camp in Italy. Declaring his status on arrival, he was held in detention near Gatwick before he was released and **told to go to Cardiff**. With no coat or money, or knowledge of where Cardiff was, a Police Officer helped him to the train station, and he found his way to National Asylum Support Service (NASS) Accommodation in Cardiff. Abu spent seven months there until he was detained again by the Home Office for two weeks before he was returned back to his NASS property. Eventually, in 2019 he was granted leave to remain and given 28 days' notice to leave his accommodation. Abu was advised to present at housing options:

“Housing options was bad, I was given an appointment, but I had to sit and wait for hours, I felt ignored. It was very stressful, I have trauma from sounds (war in home country, sleeping rough in Italy and destitution) and found this process very challenging.”

Abu then slept on the floor at his friend's room in NASS Accommodation for 2 months but left as this put his friend at risk. Abu asked for a letter from his doctor explaining his health needs, **but this was not taken into consideration by housing options**. Abu then spent time either sleeping at available Emergency Accommodation or rough sleeping, as he disliked drugs being taken

openly there. With no bank account and therefore unable to claim benefits, he was sometimes turned away from the Emergency Accommodation as this meant no funding for his place. Eventually, Abu was offered a place at a **Temporary Hostel** and stayed there for a year. The environment here was challenging, cooking and laundry facilities were limited, while personal items stolen. The Welsh Refugee Council helped him set up a bank account and apply for Universal Credit and Abu's situation has now improved. Under the family reunion scheme, Abu has been joined by his mother and son and is living in a **temporary house run by Cardiff Community Housing Association (CCHA)**, awaiting a permanent offer. He has a job and feels positive about the future. Reflecting on the process, Abu feels it was the support from friends that got him through the process.

Failure to prevent homelessness

The Housing Act (Wales) 2014 provides a council with a duty to prevent a person from becoming homeless within 56 days of when the threat is identified. However, once an asylum seeker obtains refugee status the asylum support provided will end within 28 days of the granting of refugee status. This means there is less time to act to prevent homelessness. A number of participants raised this as a primary cause for their homelessness. Some participants suggested little support was available while they were awaiting a decision to prepare them for life in the UK or over the 28-day notice period. On leaving the accommodation, participants described doing so into homelessness, rough sleeping or sofa surfing with friends where possible.

Inappropriate Temporary Accommodation

Experiences of Temporary Accommodation (in these instances) were generally negative and included NASS Accommodation, as well as emergency and temporary hostels. Highlighting the condition of some of the properties, one asylum seeker told us, "We lived in the hostel full of cockroaches for a year in England and when we arrived to Wales, we were given a house with a fallen wall and hole in the floor. The officer told us if we don't like it "he would kick us out and close the door." The Home Office and (the provider) then said it's all fine and the officer received additional training, but the government doesn't have money to repair."

Emergency Temporary Accommodation had similar challenges, with one participant given a dirty sleeping bag to sleep on the floor, while the atmosphere of open drug taking acted as a barrier and led to rough sleeping for a number of participants. Across the spectrum of Emergency Accommodation, participants talked about staff not being particularly helpful, ranging from a lack of sympathy, lack of understanding of trauma, through to openly aggressive and threatening behaviour.

Low supply of appropriate accommodation

A lack of appropriate homes for refugees was raised by a number of participants. In particular, the difficulty in accessing one or two-bedroom properties. For some, this forced them to live in small flats with little money left over once rent had been paid. For others, this meant living in houses of multiple occupancy or sofa surfing. Friction between refugees and asylum workers was often experienced due to prior trauma experienced, overcrowded houses with noise and difficulties sleeping linked to people working unsociable shift patterns. For two participants, this forced them to quit jobs or leave the property into homelessness.

Inability to work

A common frustration was the inability to work while seeking asylum. This prevented people using existing skills, integrating into the community, having an income, and saving money. Not having savings meant that on eviction from NASS accommodation, it was difficult to access the private rental sector which directly contributed to homelessness. As one participant told us:

“I would like to work also, to keep me busy... When you don’t have those kinds of things, you’re worried. You’re worried for the future and you’ll be lazy for the future, that’s the main problem.”

“We still can't work and depend on ourselves. The system makes it really hard for asylum seekers like me to exist in the UK and live a normal life. We have very limited access to basically everything.”

Case Study – Lengthy asylum process and homelessness

Ibrahim entered the UK in 2012 claiming Asylum, which was initially rejected in 2014. He then spent some time **sofa surfing**, but no one could accommodate him long-term, so he had to move every few days. On submitting an appeal, Ibrahim was offered NASS Accommodation. After a second rejection, he was **evicted from NASS** and was intermittently sleeping on the streets or with friends. After being hospitalised with Covid in 2020, Ibrahim was supported by a charity on discharge and has been since then, with **temporary placements for a few months at a time**. The whole Asylum process, and sporadic periods of homelessness, has now gone on for **over 10 years**. During this time, Ibrahim has had to rely on charities to live and has been unable to work, which is frustrating as he wants to, and this would give him some money to live. He feels his life is on hold.

Lack of clarity and the reliance on charities

Unsurprisingly, participants reported a lack of understanding of the system and how it worked. Not understanding fully whether and what they are entitled to, and not wanting to contact authorities to access it for fear of deportation. Unsurprisingly, language barriers were experienced. Participants were therefore living destitute lives and experiencing some of the more precarious forms of homelessness, reliant on charities to provide support around accommodation, food, or advice.

Black and Minoritized Communities

Recent research has identified higher levels of homelessness amongst black and minoritized ethnic communities in the UK. Statutory homeless applications between 2016-2021 show higher rates amongst minoritized communities and in particular, amongst Black and mixed-race communities. The 2011 Census identified overcrowding levels in Wales of 27% of Bangladeshi, 19.4% of Black and 18.5% of Arab households, compared to 4.9% of White British people. Experiences of living conditions also differ, with Bangladeshi and Black Caribbean households more likely to live in non-decent homes. Problems of damp are more prevalent, with 3% of white British households affected by this issue compared with 10% of Bangladeshi, 9% of Black African and 8% of Pakistani households.

Due to the nature of Women Connect First's work, experiences of homelessness as a result of domestic abuse are reflected below.

Communication with the council

A number of participants reflected that communication with the council was challenging. While discussions with council staff were generally regarded as polite, and some participants had positive experiences, the general feeling was negative. Responses to queries were not always forthcoming, sometimes incomplete and not in a timely manner. Participants also reported having to spend a lot of time being proactive and chasing up the council.

One participant reported; "I spend so much time contacting the council, it is exhausting. I asked for Temporary Accommodation and they sent the letters to the wrong address... to the house we were previously occupying. They should have rang me on my mobile."

While another said:

"Women Connect First has been contacting the council but they never give an update. They just say we will get in touch when we have a property for you. Communication is really poor; I am worried my documents have gone to the wrong office as I haven't heard anything from the council or the housing options."

It is unclear whether these communication barriers are due to language, lower awareness of systems or the staff at the council.

On whether the nature of responses was because of their background, participants did not particularly feel this was the case, a common attitude was, “I don’t feel discriminated against... but I don’t understand why it’s taking so long.” While another participant reflected, “Language barrier is a huge problem; I can’t express myself the way I want. Sometimes I think it is an excuse for them not being able to speak to me.”

Case study – Unsuitable Temporary Accommodation and uncertainty around accessibility

Safa has been in the country for five years. She was living with her family in a private rented home. **The landlord asked her to leave so she applied for social housing.** They have given her **Temporary Accommodation.** “The temporary house we live in is in **bad condition.** I am **registered disabled** and have mobility issues. I have had two hip replacement operations. I can’t go **up and down the stairs** easily and I can’t get in and out of the bath.” The council are building a new scheme where she will be placed once building works have finished. Safa knows the location of the house but **is not allowed to go and see** it. It has been one and a half years and every time she calls to ask, she is told the house will be ready in two weeks.

“I don’t know what’s going on, I have contacted the council for months now and they never give me a date for when the house will be ready.”

“When we moved into the house I explained my mobility issues to the council, they said **it’s only temporary so deal with it!** The officers are **polite**, but I don’t **feel supported** by them. I am grateful they are giving me a new home; I don’t want to complain just in case it affects my application.”

“I gave my **specifications to the council for the house**, like a walk-in shower but I **have no idea** what it will be like. They don’t tell you anything... I am a bit worried.”

Poor living conditions and bad landlords

A theme across a number of participants was experiencing homelessness due to their homes being sub-standard and it not reasonable to expect them to continue to live there. This included the general state of homes as well as risks to it with one participant raising the safety of a building after a fire.

“The flat was ruined and we weren’t allowed to go back into the building for two days. I rang the housing options team, and they told me we could stay in a hotel for two days. They said they would refund me the cost of the hotel rooms - I am still waiting for the payment.”

“I wish they had offered me a Temporary Accommodation; I would have taken it. We moved back to the flat, the fire took place last March and the landlord still hasn’t repaired the building. The stairs have plastic on them. My wife fell as she slipped on the plastic. She now has a bad back and serious mobility issues. I have told the housing options team everything, but they don’t do anything.”

Another participant said of the state of their property:

“My house is 100 years old; it is a council house. We have no lights, there are leaks everywhere. The floor in the kitchen is gone, we have mice everywhere. I killed sixteen the other day. There are seven of us living in a three-bedroom house. I have rung the council many times, they listen but do nothing.”

“We have been here for two years. The house was in a bad state when we moved but it is getting worse. I have sent the council pictures. Some of the rooms are unusable, it smells of gas and damp, my kids are asthmatic, and the house condition is affecting their health. The children are not happy. It is affecting my mental health, we can’t relax - everything is in boxes.”

Case study – Home in disrepair with threats of eviction

Noah currently lives with his family in private accommodation which is in extremely poor condition. The **landlord is constantly threatening to evict them**. He does not listen to any of the problems with the house and hasn't fixed anything for several years.

"The children are very upset all the time. Even though we are living under a roof it feels like we are homeless. The poor condition of the house and the noisy neighbour makes us feel very depressed."

When asked if he feels supported by the council and if Noah would accept Temporary Accommodation; "The waiting lists are very long. **We don't think the council are taking our complaints seriously**. If they offered us Temporary Accommodation I would move straight away. The council are bad at responding we have no idea how long it will take for them to provide us with a house".

"We have been in this house for six years. **The rent is unaffordable, and the landlord is constantly threatening to kick us out**. The pipes are leaking, and water is dripping from the ceilings. My children's skin is being affected – they have asthma too."

These experiences reflect not only unacceptable living conditions but also inappropriate behaviour by landlords, a combination that does seem to be prevalent within this research group compared to others. The newly implemented [Renting Homes](#) (Wales) Act should provide a mechanism for dealing with issues around bad landlords and fitness for human habitation, however there may be scope for consideration of alignment between new homelessness and housing law to resolve these situations, including more quickly.

Domestic abuse and sexual violence

A number of participants experienced homelessness as a result of domestic abuse and/or sexual violence. While support was mixed from the council, in all instances interventions could have been made earlier and more sustainable solutions provided. In at least one example, the difficulties were ongoing. One participant said, "My partner became physically abusive towards me. He

removed me from the tenancy agreement, and I lost my independence. If I stood up for myself, I was threatened with being thrown out of the house. I knew I had no rights and had nowhere to go so I put up with the abuse.”

“I reported my husband to the housing options and told them I feared for my life if I stayed with my husband. I told them my kids and I had nowhere else to go.”

“One day I had to call the police as he had physically attacked me. The police said my name wasn’t on the occupancy so I would have to leave. I left with my children and stayed in a hostel for a few weeks. I found a private rented house and moved in and claimed benefits for some of the rent. It was unaffordable so I contacted the council. The council were very supportive, they provided me with a three-bedroom house, and I managed to move out of the private rented accommodation. We are ok now; my children are happy.”

Case study – Coercive control, cultural sensitivity, and lack of accommodation

Niah is currently living with her extended family and is **experiencing extreme coercive control and physical abuse from her relatives**. She is told girls should not be allowed out of the house. Niah wants to go to college and work but is not allowed as she is **confined to her room by the relatives** and is not allowed to use the rest of the house. Niah lives in complete isolation and is **scared living in the house which she does not consider to be home** and is often threatened to be thrown out if she does not abide by the rules. Most recently her family are putting pressure on her to marry a man much older than her. Women Connect First have contacted numerous housing associations on Niah’s behalf and the council to ask if they are able to provide accommodation for this highly vulnerable young lady but Niah been on the **housing options list for one and half years**. Niah suffers from poor mental health issues due to trauma and abuse. Her medical records clearly state her physical and mental health issues and are being used as evidence to support her housing needs.

On the support she has received from the council and housing association, the participant said:

“Although the housing officers at the council are sympathetic it feels like all they say are words, no action is taken, I haven’t even been offered Temporary Accommodation.”

“CCHA (Housing Association) are more supportive than the council and reassure me I will be moved soon.”

While of housing options:

“The housing officers have advised me to contact the police, but I have said no, I am too scared my family will punish me... There isn’t any cultural sensitivity, by telling the police it will complicate my life in the community, I will bring shame on my culture, and I will be disowned.”

Gender-informed housing services and law

These experiences of domestic abuse and homelessness clearly highlight the challenges women face regarding safe homes. While improvements in some of these areas are covered by the Renting Homes Act, it raises the question of how any future housing law and services could be gender-informed? One participant said, “I think the council and housing associations should be more considerate to the housing needs of women suffering from domestic violence. There should be more compassion and understanding.”

Another participant told how she had been raped and this had led to repressed trauma which had resurfaced during Covid. Living in a house of multiple occupancy containing six men, and she spent days locked in her room only using the bathroom at night and avoids the kitchen for fear of men being in proximity of her. She reflected, “I don’t feel like this is my home.”

“I came to Women Connect First and we contacted the council to see if they could provide me with accommodation. We submitted evidence from my GP to prove my mental health was being affected by my living conditions. I have been placed on the housing list; it has been two years, but I am still here.”

LGBTQ+

The LGBTQ+ community has a higher risk of homelessness than the general population. As many as [1 in 4 of young people](#) who are homeless, identify as part of this community. Research into these experiences by [AKT](#) has identified that they can be particularly traumatic; 61% felt frightened or threatened by family members before becoming homeless while 17% felt they had to have casual sex to find somewhere to sleep. This research also identified LGBTQ+ people are more at risk of remaining 'hidden' as they seek support from friends rather than through the system. But homelessness is not just an issue amongst younger people in the LGBTQ+ community. Since the Pandemic, Stonewall Housing has seen a [70% increase](#) in people 50 or over. Common risk factors can include; less likely to have family support from children, increased risk of mental health difficulties as a result of homophobia in society, as well as harassment from neighbours and landlords.

It is against this backdrop that research was commissioned by local authorities across Gwent into experiences of homelessness. Here are the relevant findings to this research:

Lack of data collection around gender and sexual identity

Only 8% of participants were sure they were asked about their sexual orientation when asking for help and only a third were sure they were asked about their gender identity. For this third who were asked about gender identity, this ranged from when they first asked for help, when an application was made through to when accommodation was offered. One respondent highlighted even when information was collected, it was wrong as they were misgendered and "aggressively asked to move into a women's hostel and they haven't listened to any explanation about why I won't do that."

Experiences of Temporary Accommodation

Experiences of Temporary Accommodation were mixed. While some respondents to the online survey spoke positively about being placed in hostels and being connected to much wider support, one of the core recommendations from the Gwent research was the provision of LGBTQ+ specific accommodation. For instance, one participant stated:

"I know of one who went to a homelessness shelter after fleeing domestic violence and was sexually assaulted by another user, because they were trans, so that danger would be greatly reduced if it was an LGBT space ... I think it would greatly reduce anxiety and people would be much more likely to properly engage in the support."

"It is already stressful enough, but everything that comes with that like it would cut down on so much stuff, like casual transphobia, constant misgendering, having to explain your experience to people who had never even heard of it before, it would make everything like so much easier, and safer, in my opinion."

One participant suggested that the lack of bespoke services could contribute to repeat homelessness, and were in that regard expensive, inefficient, and not preventing further homelessness:

"I would bet on if you compared the outcomes on people leaving LGBT specific refuges, places to those, I would bet people who go through LGBT services are a lot less likely to repeat instances of homelessness, because their needs would be met by the service - they wouldn't like for example be people who go to nonspecific shelter."

The risks of sofa surfing

The challenges outlined with experiences of services and Temporary Accommodation mean that 'hidden homelessness' was a recurring theme participants referenced. Currently, sofa surfers are not included within the definition of priority need in Wales. This was felt to put some at risk with one respondent highlighting that while sofa surfing, they were "exposed to people who were drinking every day... free cocaine and free weed, and it would have been easy for me to go down that road."

Family mediation not always the right option

Prevention forms a key part of existing homelessness law in Wales, however, for some young people, efforts at mediation or returning the person to their parents' home may not always be appropriate. One participant told us, "I approached social services though, about my mum, shortly after I was kicked out (my brother was still living there and didn't feel safe). They had a police visit which I was invited to. The police told us it was normal for parents to throw things at kids and call us names."

Local connection

Having a local connection to an area can form part of a decision as to whether a council decides to support an individual. While there are nuances around this for people in the armed forces, care leavers and former asylum seekers, close family members who have lived in the area for at least five years can be a determinant in getting accommodation. Yet, given the breakdown of family relationships for some people in the LGBTQ+ community, strong friendship groups can instead play the role of family, yet this is something that is never considered and as one participant stated:

"Having strong community ties in terms of the LGBT community is not respected as a local connection at all, because what they don't seem to understand is that a community having chosen family is as important, if not more important for LGBT people as having blood family, and that is just, I have never heard any service respecting that as a local connection at all."

Consideration points

This research provides insights into the experiences of people with specific protected characteristics in homelessness. As a small-scale qualitative research project, it cannot be considered a definitive sample of these communities' experiences as a whole, however it does highlight case studies and circumstances which may well reflect those experiences.

The research identifies experiences both in relation to the law and services, and in particular how the two can interact with each other. While this report is not seeking to make recommendations, we feel there are two broad points to consider when looking at potential changes to the law:

- How can people with protected characteristics be better served by homelessness and housing services and the law that underpins them?
- Can homelessness be eradicated, without consideration of some of the specific experiences identified within this research of people with protected characteristics?

To support the next phase of the White Paper development, we have captured points of consideration based on our research and identified the following five themes:

- 1) People with protected characteristics appear to have challenges associated with their experience of homelessness, such as:
 - Having difficulty in getting their situation resolved or understood.
 - Facing barriers advocating for themselves or providing their own evidence which could improve their situation.
 - Not having enough information collected which could help their situation be better understood or managed.
 - Being reliant on external agencies for support in resolving their issues.
- 2) While the current definition of homelessness is broad, existing law and services could do more to capture all forms of homelessness. For people with protected characteristics who may be experiencing homelessness in certain ways, this may mean;

- The culture that implements services and the law that underpins them may not be fully understanding of the needs of certain groups.
- The system may not have the flexibility to deal with some of the circumstances people with protected characteristics are facing, in particular the complexities and nuances associated with intersectionality.
- Within a highly pressurised system, the needs of these communities may be missed.
- There are indications from this research that ‘hidden homelessness’ may be higher amongst some participant groups, thus acting as a challenge to ending all forms of it.

3) Specific issues around Temporary Accommodation include:

- A lack of culturally specific appropriate services and accommodation for multiple groups.
- People are not presenting as homeless and/or not accessing TA as it does not meet their needs.
- These factors may be contributing to hidden homelessness.

4) To build on existing law, there may be opportunities to review:

- Consideration of protected characteristics and the ongoing role of priority need.
- How local connection rules seem to be affecting allocations of properties and who that may be affecting negatively.
- Given the emphasis on trauma and gender-informed services, what a gender or trauma informed housing law may look like?

5) Under the auspices of ending homelessness, reviewing overlapping legislation to understand:

- Can homelessness be ended without reform of immigration law?
- How could the welfare system prevent homelessness?
- Are there opportunities for alignment with existing housing law in Wales such as the Renting Homes (Wales) Act?

- How will changes around the Police, Crime, Sentencing and Courts Act affect homelessness in Wales?
- Could wider duties on other bodies (especially public bodies) help prevent homelessness?
- How can the law contribute towards generating sufficient housing supply that prevents homelessness and can manage a small degree of it.