

HB 46

National Assembly for Wales

Communities, Equality and Local Government Committee

Housing (Wales) Bill: Stage 1

Response from: Chwarae Teg

## Evidence

### National Assembly for Wales Communities, Equality and Local Government Committee – Housing (Wales) Bill

December 2013

#### Introduction

Chwarae Teg exists to deliver our vision of a Wales where women achieve and prosper. We do this by working with women to broaden horizons and build confidence and skills; working with employers to create modern workplaces that are successful by harnessing everyone's contribution; and working with influencers, educators and decision makers to build a society that values, supports and benefits women and men equally.

We are pleased to provide evidence to the Communities, Equality and Local Government Committee in relation to the Housing (Wales) Bill. This Bill demonstrates Welsh Government's commitment to ensuring that everyone has access to a decent affordable home and to eradicating family homelessness by 2019.

The economic downturn has drastically changed the face of the housing market in the UK and Wales. There is an increasing demand for rented properties, pressure on social housing is rising and changes to the welfare system (spare room subsidy, Universal Credit, direct payments) are causing uncertainty. In light of these changes it's important that housing legislation responds in a robust manner. As women are less likely to own their own home than men - by 2008-2009 more than three quarters of men owned their own homes compared to three fifths of women<sup>1</sup> - this means issues within the rented housing market impact more heavily on them.

It is also important to be mindful of the different needs and experiences of women who are or are at risk of being homeless and in the housing market more generally.

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<sup>1</sup> Lynn Vickery 'Deepening disadvantages in housing markets for women' Local Economy 2012 27:296

These differences mean that the support and guidance needed by women can look very different to that required by men.

Our detailed response is outlined below highlighting the gender impacts and considerations for each of the general principles of the Bill.

## Detailed Response

### **1. Help people have access to a decent, affordable home and ensure that people at risk of becoming homeless receive the help they need.**

- 1.1. As outlined by WG housing plays an integral part of daily life and is an important influence on our health, education prospects, employability and leisure activities as well as affecting our communities.
- 1.2. A key aim of the Bill is the prevention of homelessness so it is important that the complex and varied needs of women who are at risk of homelessness are taken in to consideration. It is clear from a number of sources that many women facing homelessness are fleeing abuse, suffering with mental illness and dealing with substance misuse issues.<sup>2</sup>
- 1.3. These complex needs mean that action to prevent homelessness among women needs to be specialist and able to provide guidance and support across many areas.
- 1.4. Homelessness among women can also be a hidden problem as many take extreme measures to avoid the dangers of sleeping rough such as living in squats, returning to abusive partners and engaging in sex work.<sup>3</sup> To effectively prevent homelessness this has to be taken in to consideration.
- 1.5. It is also important to note that refuge should not be the only gender specific type of accommodation available. The varied and complex needs of the women who present as homeless means that a safe, supportive environment is key to enabling women to feel part of a community where they are secure and can build and maintain links with formal and informal support networks.
- 1.6. Provision in the Bill to double the amount of time that a local authority can look for a solution for someone presenting as homeless should better enable councils to find lasting solutions for clients. More permanent solutions will help to reduce the anxiety that comes with uncertainty over housing and provide much needed stability.
- 1.7. Cooperation between local authorities, housing associations, third sector specialist support providers and other organisations working in the sector is also key. While the Bill alludes to the importance of a

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<sup>2</sup> St Mungos Rebuilding Shattered Lives <http://rebuildingshatteredlives.org/>

<sup>3</sup> Women's Resource Centre (2013) 'Women's equality in the UK: CEDAW shadow report' [http://thewomensresourcecentre.org.uk/wp-content/uploads/Appendix-26\\_Housing-and-homelessness\\_FINAL2.pdf](http://thewomensresourcecentre.org.uk/wp-content/uploads/Appendix-26_Housing-and-homelessness_FINAL2.pdf)

coordinated approach the mechanisms by which this will happen need to be made clear.

## **2. Raise standards in the private rented sector and place a greater emphasis on action to prevent people from becoming homeless.**

- 2.1. Over the past 15 years the number of people renting from landlords has almost doubled to 8.5 million with nearly a third of renters being families with children.<sup>4</sup> In light of this, action to regulate and improve standards in the private rental market is welcome.
- 2.2. Pressure on social housing has also risen with waiting lists of 10,000 people in cities like Cardiff. Given that women make up 54% of social housing tenants<sup>5</sup> and those with children qualify as being in priority need, this deficit in social housing has a large impact on women.
- 2.3. A key principle of the Bill seems to be encouraging greater cooperation between private landlords/ letting agents and the social housing sector, which could help private landlords to play an important role in alleviating the pressure on social housing.
- 2.4. However we echo Tai Pawb's concerns about the potential impact on equality of local authorities discharging their homelessness duty to the private rented sector. Local Authorities have a public sector equality duty to fulfil while private landlords do not. Social housing is often accompanied by further support to tenants such as financial inclusion assistance, digital inclusion activities and skills and employment assistance.<sup>6</sup> Housing solutions in the private rented sector may not offer such support and the potential impact of this on protected groups should be explored.
- 2.5. The pressure on social housing and the wider rental market is likely to increase as benefit changes come into effect. Women stand to be hit much harder by welfare reform than men with an estimated three quarters of savings coming directly from women's pockets.<sup>7</sup> Given women's dominance as social housing tenants housing benefit changes are of particular concern.
- 2.6. The spare room subsidy is having an especially large impact in Wales as there is a shortage of small 1 and 2 bedroom properties for people to downsize in to.<sup>8</sup> The private sector could again help to alleviate pressure in this area if greater cooperation is encouraged and rents and standards are more consistent.
- 2.7. Another concern is the potential impact of Universal Credit and the switch to direct payments. This could cause some private landlords to decide that they no longer wish to lease to benefit claimants. The

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<sup>4</sup> Fabian Society (2013) <http://www.fabians.org.uk/welcome-to-dclg/>

<sup>5</sup> Chwarae Teg briefing (2013) 'Women and Welfare Reform'

<sup>6</sup> Tai Pawb (2012) response to 'Homes for Wales – A White Paper for Better Lives and Communities' consultation

<sup>7</sup> Fawcett Society (2013) <http://www.fawcettsociety.org.uk/benefits/>

<sup>8</sup> Welsh Affairs Committee (2013) 'The impact of changes to housing benefit in Wales' <http://www.publications.parliament.uk/pa/cm201314/cmselect/cmwelaf/159/15902.htm>

current social housing stock is not large enough to deal with this surplus so work should be undertaken to prepare for this possibility.

- 2.8. It is also important to encourage more landlords to offer long term leases. In the past housing policy has 'underestimated the link between secure housing as a prerequisite to the sense of confidence which is the foundation of economic and social development.'<sup>9</sup> Stability is particularly important for vulnerable women to allow them to feel safe and secure and to offer the opportunity to develop support networks. It is clear that providing a long term housing solution would enable women to do this with the potential benefit of allowing them to return to work. This would in turn help to alleviate issues of poverty, enable families to move off benefits and have a positive effect on women's self-confidence and independence.

### **3. Provide local authorities with the power to introduce, should they wish to do so, an increased rate of council tax on long term empty homes**

- 3.1. As outlined above there is increasing pressure on both the social housing and private rental markets. Any action that may generate more available housing is welcome provided that standards remain high.
- 3.2. Long term empty homes are a particular problem in rural communities and are recognised as having a serious impact on the viability of these communities.<sup>10</sup>
- 3.3. This further compounds a lack of affordable housing for local people which is needed to ensure the sustainability of rural communities. It also helps to ensure a balance of different types of household in the area, which is vital to the viability of amenities and services such as shop, schools, public transport and recreational activities.<sup>11</sup>
- 3.4. The loss of these services and amenities has a much larger impact on women than on men. The loss of public transport links have a particularly detrimental effect as a quarter of all women in Wales rely on bus services to get to work, training and leisure facilities for themselves and their children.<sup>12</sup>
- 3.5. The ability to increase council tax charges should help to encourage more landlords to bring their properties back into use. It would also be advisable to explore the potential for local authorities to use this as a tool to increase the availability of affordable housing, particularly in rural areas.

### **4. Place a duty on local authorities to provide sites for Gypsy and Traveller communities in response to identified need**

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<sup>9</sup> Lynn Vickery 'Deepening disadvantages in housing markets for women'

<sup>10</sup> House of Commons Library Standard Note (2013) 'Empty Housing'

<sup>11</sup> Shelter Scotland Shelter Housing Action with Rural Communities (SHARC) project

[http://scotland.shelter.org.uk/about\\_us/how\\_we\\_make\\_a\\_difference/specialist\\_services\\_in\\_scotland/housing\\_action\\_with\\_rural\\_communities](http://scotland.shelter.org.uk/about_us/how_we_make_a_difference/specialist_services_in_scotland/housing_action_with_rural_communities)

<sup>12</sup> Bevan Foundation (2013) via WalesOnline <http://www.walesonline.co.uk/news/wales-news/women-biggest-losers-bus-services-6111337>

- 4.1. There are many reports that cite the inequalities faced by Gypsy and Traveller communities, especially around access to education, health and public services. While both men and women experience inequality, women bear an especially heavy burden across many areas of their lives.<sup>13</sup>
- 4.2. Inappropriate accommodation exacerbates issues of inequality faced by Gypsy and Traveller women. Unauthorised sites can lead to tension with local communities and it is clear from a number of sources that provision of a site is a better solution for many women than housing.<sup>14</sup>
- 4.3. Gendered roles remain strong among Gypsy and Traveller communities with men being responsible for supporting the family and women taking a more home focused role. Therefore placing families in housing can lead to women becoming isolated from the support networks and communities on site. They often report 'significant distress over loss of community and having to deal with complex bureaucracies and financial issues without appropriate emotional or practical support.'<sup>15</sup>
- 4.4. A lack of secure accommodation can have a particularly detrimental impact on the antenatal care that Gypsy and Traveller women can access. Gypsy and Traveller mothers are 20 times more likely to experience the death of a child than the rest of the population.<sup>16</sup> On top of barriers such as fear of prejudice, isolation of sites, lack of transport and literacy issues, insecurity of accommodation and site evictions can lead to no continuity of antenatal care.
- 4.5. Accommodation also has a significant impact on the ability for Gypsy and Traveller women to access education and training. Reports suggest that 'for those families who have a stable site, women are proving more adaptable to changing economic circumstances than are most traveller men, and in some cases are returning to education, skills training or...entering the formal labour market.'<sup>17</sup>
- 4.6. The duty this Bill places on local authorities should help to ensure that appropriate accommodation is secured for Gypsy and Traveller communities however it is important that the provision of a suitable site is not a solitary action.
- 4.7. Tension between Traveller communities and other groups in site areas acts as a further barrier to public services. Therefore site provision should be accompanied by a package of information and support to help ensure greater community cohesion and allow both men and women from these communities better access to public services, education and health. This in turn should help to address some of the inequalities faced by Gypsy and Traveller communities.

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<sup>13</sup> South East Wales Women's Aid Consortium (2010) 'Domestic Abuse and Equality Gypsy and Traveller Women

[http://www.equalityhumanrights.com/uploaded\\_files/Wales/domestic\\_abuse\\_and\\_gypsy\\_travellers.pdf](http://www.equalityhumanrights.com/uploaded_files/Wales/domestic_abuse_and_gypsy_travellers.pdf)

<sup>14</sup> EHRC (2009) 'Inequalities experienced by Gypsy and Traveller Communities: A Review'

[http://www.equalityhumanrights.com/uploaded\\_files/research/12inequalities\\_experienced\\_by\\_gypsy\\_and\\_traveller\\_communities\\_a\\_review.pdf](http://www.equalityhumanrights.com/uploaded_files/research/12inequalities_experienced_by_gypsy_and_traveller_communities_a_review.pdf)

<sup>15</sup> EHRC 'Inequalities experienced by Gypsy and Traveller communities'

<sup>16</sup> EHRC (2009) 'Simple solutions for living together'

[http://www.equalityhumanrights.com/uploaded\\_files/gypsies\\_and\\_travellers.pdf](http://www.equalityhumanrights.com/uploaded_files/gypsies_and_travellers.pdf)

<sup>17</sup> Ibid.

- 4.8. The provision of guidance for local authorities may be sufficient to ensure that this additional support is provided. Encouraging partnership working with service providers and third sector organisations should be a part of this guidance.
- 4.9. Placing a statutory duty on local authorities to provide this additional support might be considered if a voluntary system does not work.

## **5. Assist the expansion of co-operative housing by improving arrangements for people who wish to join or leave a co-operative**

- 5.1. Proposals to enable housing cooperatives to develop affordable housing schemes are welcome as they can help to further ease the pressure on social housing. As outlined above this will be of particular benefit to women given their dominance within social housing.
- 5.2. Housing Cooperatives have also been seen to provide additional support through empowering people to live an independent life and to play a role in their communities.<sup>18</sup>
- 5.3. There are other aspects of cooperative housing that are of particular benefit to women. Many of those who are interested in cooperative models cite positive neighbour relationships, the opportunity to develop informal support networks and feelings of personal safety in their environment as reasons for their interest.<sup>19</sup> These reasons become even more important for those with dependent children.
- 5.4. In light of this, cooperative housing schemes could be utilised to provide the stable, secure environment and support that many vulnerable women need to re-enter, or look to progress in, the workplace.

## **6. Set standards for those local authorities that retain their housing stock on rents, services charges and quality of accommodation and support the achievement of the Welsh Housing Quality Standard**

- 6.1. Poor quality housing can have a huge impact on wellbeing and can lead to poor mental health, lower educational attainment, unemployment and poverty.<sup>20</sup>
- 6.2. Therefore improvements to the quality of social housing stock will greatly benefit tenants (54% of whom are women) and should have a positive impact on the health and wellbeing of these families.
- 6.3. The i2i project has achieved great success encouraging the utilisation of social clauses in procurement contracts to achieve community benefits such as jobs and training and support for local community initiatives. Often these opportunities are created in some of the most

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<sup>18</sup> Operations Mace – an East London housing cooperative project <http://www.theguardian.com/social-enterprise-network/2013/feb/14/housing-co-operatives-tackle-crisis>

<sup>19</sup> Wales Cooperative Centre (2013) 'Research into the potential demand for cooperative housing in Wales' [http://www.walescooperative.org/tmp\\_downloads/q101k8v27y52w25x89l99q83e146u91w127i146f142a109s16/housing-reportfinal-eng.pdf](http://www.walescooperative.org/tmp_downloads/q101k8v27y52w25x89l99q83e146u91w127i146f142a109s16/housing-reportfinal-eng.pdf)

<sup>20</sup> EHRC (2011) 'Human Rights at Home: Guidance for social housing providers' [http://www.equalityhumanrights.com/uploaded\\_files/humanrights/human\\_rights\\_at\\_home.pdf](http://www.equalityhumanrights.com/uploaded_files/humanrights/human_rights_at_home.pdf)



deprived areas of Wales given the link between poverty and social housing.

- 6.4. However, as with other infrastructure investments, the industries that gain tend to be those that are male dominated. Statistics show that construction is particularly male dominated with 90% of the workforce being male and only 1% of on-site manual workers in the industry being female.<sup>21</sup>
- 6.5. We would like to see consideration given to how work to meet this standard can be designed to benefit men and women more equally in terms of jobs and training opportunities.
- 6.6. Chwarae Teg will be exploring ways in which we can work with CIH Cymru and i2i to ensure that women gain more from procurement in the housing sector.

## **7. Abolish the Housing Revenue Account Subsidy system in Wales to enable stock retaining local authorities to become self-financing.**

- 7.1. Action to enable Welsh local authorities to begin building new, affordable homes is welcome.
- 7.2. This will have an obvious benefit to women given their dominance in the social housing sector.
- 7.3. We are pleased to see a commitment to a co-production approach between Government and local authorities to implement the changes.

## **8. Other Comments**

- 8.1. Removal of priority need for ex-offenders
  - 8.1.1. We have some concerns about the potential impact of this change on ex-offenders and in particular on female ex-offenders.
  - 8.1.2. As there are no women's prisons in Wales female offenders have to serve their sentences far away from family, children and support networks, all of which play an important role in preventing reoffending.
  - 8.1.3. As with women that present as homeless, female offenders tend to present with complex and varied needs that will only be worsened by uncertainty over housing arrangements.
  - 8.1.4. Supported housing can make a fundamental difference to the lives of women leaving prison to the security, education and life chances of their children...and reduce the risk of re-offending.<sup>22</sup>
  - 8.1.5. In light of the above, and the WG estimates that this change will reduce the number of former prisoners found to be in priority need by 90%<sup>23</sup>, we have significant concerns about the potential impact on female offenders. Uncertainty about housing, reduced access to supported housing solutions and the increased risk of having to

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<sup>21</sup> Chwarae Teg Briefing Paper (2013) 'Occupational segregation'

<sup>22</sup> The Corston Report (2007) <http://www.justice.gov.uk/publications/docs/corston-report-march-2007.pdf>

<sup>23</sup> WLGA (2013) Briefing Paper 'Housing Bill' <http://www.wlga.gov.uk/housing-pubs/wlga-briefing-paper-welsh-government-housing-wales-bill>

spend additional time away from family and support networks all increase the likelihood of re-offending.

## **Conclusion**

Chwarae Teg welcomes the Housing (Wales) Bill and the continued commitment of the Welsh Government to tackling issues of homelessness and raising housing standards.

As outlined above, the dominance of women in social housing and the tendency for women to rent their home means that current problems within these housing areas have a larger impact on them than on men. The complex and varied needs of women who present as homeless also requires a gendered approach to ensure the availability of stable and secure accommodation that can offer support across these areas of need and the chance to develop vital support networks.

The impact of poor quality and unsuitable housing on equality, access to services, educational attainment and engagement with the labour market is well documented and briefly outlined above. There is scope for this legislation to play an important role in tackling issues of poverty, social exclusion and inequality and it is vital that this is recognised to ensure the Bill is robust enough to fulfil this role.

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## **Summary of key gender issues and recommendations**

1. Women who present as homeless often do so with complex and varied needs which must be considered as part of any action to address homelessness. Refuge should not be the only gender specific type of accommodation available and the mechanisms by which cooperation between local authorities, housing associations, third sector specialist support providers and other organisations working in the housing sector will be encouraged should be made clear.
2. Women make up the majority of social housing tenants and are more likely to rent their home than men. This means they are affected to a greater degree by any issues or improvements in the rental sector.
3. The potential impact of discharging homelessness duties to the private rented sector on equality and protected groups should be explored.
4. Welfare reform is affecting women more heavily and is likely to increase the pressure on social housing and the wider rental market. Changes to housing benefit also run the risk of discouraging private landlords from renting to benefit claimants. Work should be undertaken to prepare for the potential impact of this on the social housing sector.
5. Encouraging landlords to offer long term leases can help to provide stability, which is key to enabling vulnerable women to feel safe and secure and



develop support networks. This in turn will help women to return to work and alleviate issues of poverty which will enable families to move off benefits and have a positive effect on women's self-confidence and independence.

6. Long term empty homes are a particular problem in rural areas and can have a negative impact on the viability of amenities and services such as shops, schools, public transport and recreational activities. The loss of these services has a much larger impact on women than on men.
7. Appropriate accommodation is vital for Gypsy and Traveller women to ensure that they have access to public services and continuity of medical care, especially during pregnancy. Evidence shows that this should be on site rather than housing so that women have access to support networks.
8. Providing sites for Gypsy and Traveller communities needs to be accompanied by a package of information and support to help ensure greater community cohesion and allow both men and women from these communities better access to public services, education and health. This in turn should help to address some of the inequalities faced by Gypsy and Traveller communities.
9. Housing cooperatives are particularly favourable to women due to positive neighbour relationships, the opportunity to develop informal support networks and feelings of personal safety in their environment. There is scope for cooperative housing schemes to be utilised to provide the secure, stable accommodation that many vulnerable women need to re-enter, or look to progress, in the workplace.
10. Women gain less from work to raise housing standards to meet the WHQS as they are underrepresented in industries that benefit from this investment, such as construction. Consideration should be given to how work to raise housing standards can be designed to benefit men and women more equally, possibly through the use of community benefit procurement.
11. The removal of priority need for ex-offenders could have a substantial impact on female prison leavers. Uncertainty about housing, reduced access to supported housing solutions and the increased risk of having to spend additional time away from family and support networks all increase the likelihood of re-offending.

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If further support or information is required or the Committee would like to discuss any element of this evidence further please contact:

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