

Complete Agenda

CABINET



CYNGOR GWYNEDD

DATE	Tuesday, 20th February, 2024
TIME	1.00 pm
LOCATION	Hybrid - Siambr Dafydd Orwig, Swyddfeydd y Cyngor, Caernarfon LL55 1SH and on Zoom
CONTACT POINT	Annes Sion cabinet@gwynedd.llyw.cymru

GWYNEDD COUNCIL CABINET MEMBERS

Members	
Dyfrig Siencyn	Leader of the Council
Nia Wyn Jeffreys	Deputy Leader
Craig ab Iago	Cabinet Member for Housing
Beca Brown	Cabinet Member for Education
Berwyn Parry Jones	Cabinet Member for Highways, Engineering and YGC
Dafydd Meurig	Cabinet Member for Environment
Dilwyn Morgan	Cabinet Member for Adults, Health and Wellbeing
Elin Walker Jones	Cabinet Member for Children and Young People
Ioan Thomas	Cabinet Member for Finance
Menna Trenholme	Cabinet Member for Corporate Support

AGENDA

	Item	Submitted by	Officer	Page
1	APOLOGIES			
2	DECLARATION OF PERSONAL INTEREST			
3	URGENT ITEMS			
4	MATTERS ARISING FROM OVERVIEW AND SCRUTINY			
5	MINUTES OF THE MEETING HELD ON 23 JANUARY 2023			4 - 12
6	SAFEGUARDING POLICY REVIEW	Cllr. Menna Trenholme	Huw Dylan Owen	13 - 26
7	DELIVERY AGREEMENT, LOCAL DEVELOPMENT - RESPONSE TO THE PUBLIC CONSULTATION PERIOD	Cllr. Dafydd Meurig	Gareth Jones	27 - 124
8	WELSH GOVERNMENT CONSULTATION: 'WHITE PAPER ON ENDING HOMELESSNESS IN WALES'	Cllr. Craig ab Iago	Carys Fon	125 - 278
9	COLLABORATION PLAN APPROVAL (WALES COASTAL MONITORING CENTRE)	Cllr. Berwyn Parry Jones	Steffan Jones	279 - 281
10	REFORMING THE COUNCIL TAX REGIME - WELSH GOVERNMENT CONSULTATION: FAIRER COUNCIL TAX: STAGE 2	Cllr. Ioan Thomas	Dewi A Morgan	282 - 294
11	CYNGOR GWYNEDD PLAN 2023 - 2028 - 2024/25 REVIEW	Cllr. Dyfrig Siencyn	Dewi Wyn Jones	295 - 339
12	2024/25 SAVINGS PLAN	Cllr. Ioan	Dewi A	340 -

		Thomas	Morgan	362
13	BUDGET 2024/25	Cllr. Ioan Thomas	Dewi A Morgan	363 - 410
14	PERFORMANCE REPORT OF THE CABINET MEMBER FOR THE ECONOMY	Cllr. Dyfrig Siecyn a Cllr. Nia Jeffreys	Sioned Williams	411 - 426
15	PERFORMANCE REPORT OF THE CABINET MEMBER FOR CORPORATE SUPPORT AND LEGAL SERVICES	Cllr. Menna Trenholme	Ian Jones and Iwan G Evans	427 - 441

THE CABINET 23/01/24

Present -

Councillors: Dyfrig Siencyn, Nia Jeffreys, Beca Brown, Menna Trenholme, Berwyn Parry Jones, Craig ab Iago, Dafydd Meurig, Dilwyn Morgan, Elin Walker Jones and Ioan Thomas.

Also present-

Dafydd Gibbard (Chief Executive), Huw Dylan Owen (Statutory Director of Social Services), Geraint Owen (Corporate Director), Iwan Evans (Head of Legal Services), Dewi Aeron Morgan (Head of Finance Department) and Annes Sion (Democracy Team Leader).

Items 6, 7, 8 and 10: Ffion Madog Evans (Assistant Head - Finance Department)

Item 9: Gwern ap Rhisiart (Head of the Education Department), Debbie Anne Jones (Assistant Head of the Education Department: Corporate Support) and Gwyn Tudur (Assistant Head: Secondary).

1. APOLOGIES

The Cabinet Members and Officers were welcomed to the meeting.

No apologies were received.

Front-line staff were thanked for their work during the harsh weather.

2. DECLARATION OF PERSONAL INTEREST

There were no declarations of personal interest.

3. URGENT ITEMS

There were no urgent items.

4. MATTERS ARISING FROM OVERVIEW AND SCRUTINY

There were no matters arising from overview and scrutiny.

5. MINUTES OF THE MEETING HELD ON 19 DECEMBER 2023

The minutes of the meeting held on 19 December 2023 were accepted as a true record

6. REVENUE BUDGET 2023/24 - END OF NOVEMBER REVIEW 2023

The report was submitted by Cllr Ioan Thomas.

DECISION

- 1) To accept the report of the end of November 2023 review of the Revenue Budget and to consider the latest financial situation regarding the budgets of each department / service.
- 2) To note that significant overspend was anticipated in the Adults, Health and Well-being Department, the Children and Supporting Families Department, and the Highways, Engineering and YGC Department this year.
- 3) Approve the transfer of £4,241k of underspend on corporate budgets to the Council's Financial Strategy Reserve.

DISCUSSION

The report was submitted, and it was noted that the review detailed the latest review of the Council's revenue budget for 2023/24, and the forecasts towards the end of the financial year. It was explained that the review suggested that all the ten departments would overspend by the end of the year. It was added that there would be a substantial overspend by the Adults, Health and Well-being Department, the Children and Supporting Families Department and the Highways, Engineering and YGC Department.

It was noted that the department anticipated a financial gap of £8.1m compared to the £9.1m noted in the August review. It was explained that the position was better by a million because of the use of one-off funds to assist the situation within departments.

The following main issues were highlighted:

Adults, Health, and Well-being Department - It was noted that the latest forecasts suggested £5.4 million overspend, which was a combination of several factors including several new and costly cases, higher staffing costs and sickness levels and high rates of non-contact hours. It was conveyed that the work commissioned by the Chief Executive was now underway to obtain a better understanding of matters and create a clear response programme.

Children and Supporting Families Department - it was explained that the financial situation had worsened substantially since the end of August review, and this was due to an increase in the costs of out-of-county packages. It was noted that the Department anticipated an overspend of £1.3m.

Education Department - It was noted that there was increasing pressure on the transport budget with an anticipated overspend of £1.15m. It was explained that there was a strategic review to try and manage the increase and to try and reduce the overspend.

Byw'n lach - it was expressed that Covid had had an impact on Cwmni Byw'n lach and it was noted that the financial support would continue this year and the required amount for this year had been decreased to £360k.

Highways, Engineering and YGC Department - an overspend of £780k was anticipated by the department, it was noted that this was because of a reduction in the commissioned work that had had a negative impact on the income of highway services. It was noted that income losses in ground maintenance and public toilets were also a factor.

Environment Department - it was noted that there was an annual trend of overspending in the waste collection and recycling fields, it was explained that additional routes had led to overspend in employment and fleet costs.

Housing and Property Department - It was explained that the trend of significant pressure on the homelessness temporary accommodation services continued to be very intense; and this year, £3m of Council tax premium as well as £1.2m one-off corporate Covid provision, had been allocated to address the additional costs.

Corporate - It was noted that there was a prudent assumption when setting the 2023/24 budget, with a decline in the numbers claiming council tax reduction had led to an underspend. It was noted that the impact of the current treasury management policy meant that it was possible to avoid external borrowing. It was explained that underspend on other budgets assisted to alleviate the additional pressure in terms of the national increase in the salaries of employees, which was confirmed in November.

It was noted that the situation meant that it was necessary to use the Council's reserves to fund the financial gap of £8.1m. It was stated that it was premature to transfer money from reserves until the financial situation had been finalised. It was recommended that the current procedure would be to use £3.8m from the Post-Covid Recovery Arrangements Fund with the rest to be budgeted from the Council's Financial Strategy Fund.

It was explained that the item had been discussed at the previous Governance and Audit Committee and it was noted that the following observations had been raised. Several members had noted that there were regular references to conducting reviews within departments. Concern had been highlighted by members that there was a lack of a timetable to report back from the reviews and therefore there was a risk that there would be slippage. A desire had been expressed for the Cabinet to push for a timetable where it was appropriate. Questions about grants had been highlighted, and whether the national grant arrangements had meant that the Council relied on the money and consequently spent revenue money in areas that were not necessarily the Council's priority area. It was clarified that the grant arrangements meant that the Government was micro-managing, but that there were plans to bring more grants into the settlement which would give more flexibility to prioritise.

The sustainability of the situation was questioned, noting that this level of overspending could not continue. It was emphasised that revenue bids for the

2024/25 budget addressed overspend and were essential. It was explained that the bids had been subject to detailed challenges to ensure that they would deal with actual cases of budget shortfalls and not a failure to manage a budget.

Observations arising from the discussion

- The Chief Executive added that the report pointed to overspending but stressed that the evidence highlighted that the budget was too low and the expenditure was not futile. It was explained that the review on overspending in the Adults, Health and Well-being Department had reached a conclusion and it had been reported before Christmas that they had identified five to six areas of overspending that would be supported through the bids system. It was added that the Council had sought assistance from the Local Government Association to look at the overspending costs in Social Care in case the Council had missed something. It was noted that a review was underway to look at School Transport and that steps would be in place for the next financial year. Regarding the Waste review, it was expressed that they had reported on the work and that the actions had seen the overspend halve this year, therefore this was going in the right direction.
- It was reiterated that a report in April would give forecasts for the mid-term, and currently they were very bleak, where it was very likely that detailed work would be needed to see what may be achieved within that budget. It was stressed that the future looked much worse than the present and this was the national message.
- It was explained that the Council had delivered nearly £40m of savings since 2016, which was almost 10% of the Council's budget.
- It was highlighted that the report noted that the number of second homes subject to a premium had reduced since last year along with a reduction in houses converting and subject to business tax. It was asked if there were any visible patterns and if this would continue to fall. It was noted that there was a gradual decline in housing subject to the premium and the trend had reversed in terms of properties transferring to business tax, with more properties reverting to residential properties. However, it was noted that there had been an increase in the number of houses receiving single person discounts, which was subject to an ongoing review.

7. SAVINGS OVERVIEW: PROGRESS REPORT ON REALISING SAVINGS SCHEMES

The report was submitted by Cllr Ioan Thomas.

DECISION

To accept the information in the report and note the progress towards realising the savings schemes for 2023/24 and previous years.

DISCUSSION

The report, which summarised the situation with the Council's savings, was submitted. It was noted that to close the funding gap this year £7.6m worth of

savings needed to be implemented during 2023/24. It was a combination of almost one million previously approved, savings for Schools of £1.1m, £3m for Council departments and a further £2.4m by reviewing the Council's capital debt repayment policy.

Recent years had highlighted difficulties in realising savings in some of these areas most prominently in the Adults, Health and Well-being Department and in the Waste field. It was expressed that £2m worth of schemes with significant risks for delivery were scrapped as part of the End of August Review.

It was explained that 98% of the schemes from 2015/16 up to the 2023/24 financial year had now been realised namely £33.7m of the £34.3m. In the context of new schemes in the current financial year, it was noted that 81% had already been realised and a further 6% were on track to be realised on time. It was clarified that there was a slight delay to the realisation of £694k worth of savings schemes, but the Departments did not anticipate a problem to realise these. It was emphasised that the majority of this amount consisted of £539k savings from schools as they worked in line with the academic year and therefore realisation would slip into the next financial year.

It was emphasised that £39m of savings had been realised from the required £41m over the period. It was anticipated that an additional 1% would be realised by the end of the financial year.

The Head of Finance highlighted the comments and points raised in the Governance and Audit Committee as follows. It had been asked how one could choose between financial propriety and the performance of a statutory duty, and what would need to be done once the money ran out. It had been explained that it was essential that the Council did everything to ensure that it did not get to this point. It had been noted that there was a need to ensure the Council received value for money and made the most of every pound. It had been expressed that failure to do this gave rise to a need to make a s114 statement, and that everything needed to be done to avoid getting to this point. It had been acknowledged that there was concern about a lack of resources to get things done but that this was the current reality.

It had been noted that there was an application to undertake modelling to predict future demand, and it had been explained that the Research and Information Team was at the forefront of this area. It had been highlighted that members had indicated that they were rapidly reaching the point where there was a need for the Council to re-examine the way it delivered services.

Observations arising from the discussion

- It was noted amid the narrative of increasing cuts and pressure on staff, the need to think of the impact it was having on staff was highlighted. It was expressed that the Council's main area of expenditure was employing staff and cutting back would lead to increased pressure on staff. It was emphasised that a staff well-being programme had been placed at the top of the agenda.
- It was challenged what "statutory" was and it was clarified that were areas where the Council was statutorily required to implement, such as planning and safeguarding children. It was explained that with the financial situation as it was that it was a challenge to determine where the boundaries were in terms of

carrying out statutory duties and to cut anything above this.

8. CAPITAL PROGRAMME 2023/24 - END OF NOVEMBER REVIEW

The report was submitted by Cllr Ioan Thomas.

DECISION

- To accept the report on the end of November review (30 November 2022 position) of the capital programme.
- To approve the revised financing as shown in part 3.2.3 of the report, namely: - an increase of £3,576,000 in the use of borrowing - an increase of £2,373,000 in the use of grants and contributions - an increase of £317,000 in the use of revenue contributions - an increase of £1,038,000 in the use of renewal funds and others.

DISCUSSION

The report was submitted noting that the main purpose was to present the revised capital programme and to approve the relevant financing sources. It was explained that the main conclusions were that the Council had concrete plans in place to invest around £86.8m in 2023/24 on capital schemes, with £41.5m funded via specific grants.

It was expressed that the impact of recent financial challenges continued on the capital programme, with £23.2m namely 27% of the budget spent up to the end of November this year, compared to 40% over the same period a year ago. It was noted that an additional £27.4m of proposed spending had been re-profiled from 2023/24 to 2024/25 and 2025/26. Attention was drawn to some of the schemes which included £12.2m School Schemes, £11m Housing Strategy Schemes, £3.9m Coastal Risks and Flood Prevention Schemes.

It was highlighted that the Council had been successful in attracting additional grants since the last review which included £661k Circular Economy Capital Grant, £550k Grants for a 3G Community Synthetic Field on the Syr Hugh Owen School site.

Observations arising from the discussion

- It was stated that there was so much worry about the revenue schemes that the capital programme was often forgotten. It was made clear that the Council's ten-year assets plan would be set over the coming months, and it was highlighted that each service's requirements came to a total of £82m with capital funding at £38m and therefore there would be a need to cut back on expenditure.
- It was noted that this year's spending share was reported to be 27% which was lower than last year, and it was asked what the reason for this was. It was explained that this was due to poor profiling and some education schemes that had not moved forward.

9. PERFORMANCE REPORT OF THE CABINET MEMBER FOR EDUCATION

The report was submitted by Cllr Beca Brown.

DECISION

To accept and note the information in the report.

DISCUSSION

The report was submitted and Gwern ap Rhisiart was congratulated on his new role as Head of the Education Department. Members were reminded that the Authority had received a positive Estyn report published in September last year which testified to the organisation's hard work and everyone was thanked for their work.

It was highlighted that the department had been implementing plans within the new Council Plan but they were early days as it was a new plan. Some areas were highlighted as follows. In terms of the Transforming Early Years Education plan, it was noted that an external commissioner had been commissioned and a draft work plan had been created. It was expressed that this would reduce inconsistency in terms of the offer across the county. It was made clear that the Council was ahead of the Government's free school meals timetable, and that the upgrading work had now been carried out within schools. It was added that promotion work was needed specifically in some schools where the rate of children who benefited was lower.

It was expressed regarding the modernising of buildings and the learning environment that money may be re-directed to invest in Ysgol Hiraef and Ysgol Tryfan in Bangor, as construction costs had increased so much. It was added that in terms of the Well-being of Children and Young People and the Cost of sending Children to School that a questionnaire had been shared which would identify the actual cost of sending children to school and highlight the obvious costs of school uniforms, as well as drawing attention to more hidden costs.

In terms of the Immersion scheme, staff were thanked for their work and the children for all their efforts and there was a real need to celebrate the number of new Welsh-speakers the service had created. It was expressed that training continued within schools and that some secondary schools were in a *Say Something in Welsh* pilot scheme with the Welsh Government and that this highlighted that the department was seeking every opportunity to ensure the use of Welsh.

On a day-to-day basis it was highlighted that the attendance level remained an issue, but was visible locally, nationally and internationally following Covid. It was noted that the reasons were complex, but a great deal of work was being done. Sadness was expressed that Cabinet had taken the decision to close Ysgol Felinwnda but staff were thanked for all their work and the children were wished well in transferring to the two neighbouring schools.

Observations arising from the discussion

- The Head of Education added that the report highlighted a great deal of good news but the department was facing challenges; however, he was looking forward to moving on to work closely not only with department staff but also with the schools.
- It was highlighted that a teacher's job was not an easy job and all teachers and school staff were thanked profusely for their work and for their contribution in transferring the Welsh language to the next generation.
- It was asked how the immersion system was evaluated. The plan was to hold a user group to see what worked in order to improve the provision.

10. PERFORMANCE REPORT OF THE CABINET MEMBER FOR FINANCE

The report was submitted by Cllr Ioan Thomas.

DECISION

To accept and note the information in the report.

DISCUSSION

The report was presented, and it was noted that the department's performance had been generally good over the last few months and had made satisfactory progress with the relevant priority projects. Key issues arising from the department's performance were highlighted including the following items.

In terms of the IT Service – Support, it was noted that the service had been successful in filling key vacancies. It was highlighted that there had been over 3,453 requests for IT support during October and November 2023, with 93% calls opened and closed during the period. In looking at the IT Service – Infrastructure, it was noted that the availability of the Core Network and Critical Systems had been 100% during the period and there were no serious cyber incidents or service breaches.

Looking at finance services, the following projects were highlighted. In terms of the Income Service it was noted that the report continued to address the progress of the cases the service referred to the Legal Service to ensure that there was effective collaboration between both units. It was highlighted that the Benefits Service was performing consistently well, and the Manager and all service staff were thanked for ensuring that Gwynedd's most vulnerable people received the financial support they qualified for. It was expressed that the Payroll service had responded in a timely manner to the pay agreement for 2023/24 and had ensured that increases and remuneration had been paid to staff during November. Concern was highlighted at the failure of some services to notify the Payroll Service in a timely manner of any change in an individual's position so that action could be taken on time.

Much work had been undertaken to carry out the Ffordd Gwynedd review on the Tax service, and clear improvements had now emerged from the commitment of the Manager and the whole team to do the work. The savings schemes were highlighted and it was noted that all schemes except for one had been delivered for the 2015/16 – 2022/23 schemes. It was noted that the department did not anticipate that the scheme – Attracting additional income through an Internal Collection Agency would realise the £35k savings target so the department was looking for an alternative scheme. The total savings for 2023/24 for the Finance Department were noted to be £294,060 over 7 schemes. It was explained that £19,820 worth of schemes had already been realised and there were 3 other schemes and a total of £138,670 that were on track to deliver to the timetable. It was highlighted that 2 schemes worth £135,570 were slipping.

Observations arising from the discussion

- Attention was drawn to the Benefits Service, and it was noted that the department was consistently good; however, there was a need to encourage the people of Gwynedd to use the service to ensure they received the financial support available to them.

11. FORWARD WORK PROGRAM

The report was submitted by Cllr Dyfrig Siencyn.

DECISION

To approve the Forward Work Programme included with the meeting papers.

DISCUSSION

None to note.

The meeting commenced at 13:00 and concluded at 14:40

CHAIRMAN

CYNGOR GWYNEDD - Report to Cyngor Gwynedd Cabinet

Title of item:	Safeguarding Policy Review
Cabinet Member:	Cllr. Menna Trenholme, Cabinet Member for Corporate Support
Relevant officer:	Dylan Owen, Corporate Director Social Services
Date of meeting:	20 February 2024

1. Decision sought:

Adopt the amended "Policy and Guidelines for Safeguarding Children and Adults who are at risk of abuse and neglect" ("Safeguarding Policy") (Appendix 1) together with the Terms of Reference for the Safeguarding Strategic Panel (Appendix 2).

2. The reason why the Cabinet needs to make the decision:

The Safeguarding Policy sets out how the Council intends to fulfil its statutory responsibilities for safeguarding children and adults who are at risk in accordance with the Social Services and Well-being (Wales) Act (2014).

In June 2023 the Statutory Director of Social Services began the work of reviewing the Council's current Safeguarding Policy, together with the members of the Safeguarding Strategic Panel. Because the current version is an adaptation of a Policy created in 2013, it was decided that it was timely to prepare a new policy rather than updating the document in accordance with the usual procedure.

Because of that we ask for Cabinet approval in order to adopt the new Policy.

3. Introduction and Rationale

3.1 Background / Introduction

Cyngor Gwynedd's main priority is to ensure that children and adults at risk are safeguarded from abuse, neglect, radicalisation, slavery, domestic abuse, and exploitation.

The whole of Cyngor Gwynedd has a responsibility to create the environment that assures this, making it less likely that a child or adult is abused. These safeguarding arrangements are outlined in this policy and are the responsibility of all services within

Cyngor Gwynedd. The Safeguarding Strategic Panel is responsible for ensuring that suitable arrangements and procedures are in place at a corporate level in order to ensure the protection of children, young people and adults. This Panel is accountable to the Cabinet.

In October 2023 a workshop led by the Statutory Director of Social Services was held. Representation of officers from across the Council departments attended, including the Deputy Head of Children Services - Safeguarding and Quality and the Senior Safeguarding, Quality Assurance and Mental Health Manager.

During the workshop several changes were agreed:

- The revised Safeguarding Policy confirms that everyone has a responsibility to safeguard, but also notes specific responsibilities for Councilors and members of staff, as well as detailing how safeguarding should be reflected in contracting and commissioning arrangements.
- Highlighting the expectations for Cyngor Gwynedd staff and Councilors to act according to the principles set out in this policy at all times, whether during working hours or otherwise.
- There was a lack of clarity in the old Policy between safeguarding and protection, and this has now been addressed. The Policy makes it it is safeguarding which is under consideration, and that other procedures are to be followed when "protecting".
- The revised Policy highlights the role of the Safeguarding Strategic Panel. The Terms of Reference of the Panel has been modified, and further attention was paid to its membership in order to make sure that senior officers across the Council as well as experts in the field of safeguarding Children and Adults are invited.
- Strengthen the reporting and monitoring arrangements. An Annual Report will be presented to the Cabinet annually. That report will also go before the Full Council annually.
- Regarding the Safeguarding Policies of the Council's individual departments, it was noted that the Council has one corporate Policy. However, department can introduce their own specific policy if it is deemed necessary.

3.2 The reasoning and justification for recommending the decision

The adoption of the new Policy will ensure that the Council has a robust safeguarding procedure in place and fulfils its statutory responsibilities for safeguarding children and adults who are at risk.

There was informal consultation on the revised Policy with members of the Safeguarding Strategic Panel and members of the Operational Safeguarding Group. No public

consultation was held on the policy as the changes do not directly affect the services offered to the public.

In accordance with the legal duties under the Equality Act 2010 ("The Act") (including Welsh public sector duties) when making decisions the Council must pay due regard to the need (1) to abolish unlawful discrimination (2) promoting equal opportunities and (3) fostering good relationships based on the protected characteristics together with paying attention to socio-economic impacts.

A new equality impact assessment was not prepared, as the statutory requirement on the Council remains the same, but that the changes proposed gives clarity to staff and Elected Members regarding their responsibility to protect children and adults who are at risk of abuse and neglect.

3.3 Next steps

- If the Cabinet approves the Policy, a copy will go before the next Full Council meeting. This is felt to be an important step in order to raise the awareness of elected members.
- Further work will be needed in order to promote the revised Policy amongst all Council staff.
- There are several appendices to the Policy and the Panel intends to commission the Operational Safeguarding Group to review these, for example, re-examining the way we measure impact and monitor data.

4. Views of the Statutory Officers

4.1 Chief Finance Officer

I support the decision sought. There are no matters which involve financial propriety that need to be brought to the Cabinet's attention.

4.2 Monitoring Officer

The Safeguarding Policy supports a range of matters which relate to the safety and wellbeing of our residents. I am supportive of the recommendation.

List of Appendices:

Appendix 1 - Draft Safeguarding Policy

Appendix 2 - Safeguarding Strategic Panel Terms of Reference

Cyngor Gwynedd

Policy and Guidelines for Safeguarding Children and Adults at risk of abuse and neglect

(Referred to as the Safeguarding Policy for Cyngor Gwynedd)



Reviewed October 2023

Safeguarding children and adults is the responsibility of everyone who represents or works on behalf of the Council. We are all responsible for reporting any concern or suspicion that a child or adult is at risk of being abused and/or neglected.

1. INTRODUCTION

- 1.1. Every individual has a right to be kept safe from harm.
- 1.2. Cyngor Gwynedd's main priority is to ensure that children and adults at risk are safeguarded from abuse, neglect, radicalisation, slavery, domestic abuse, and exploitation.
- 1.3. The whole of Cyngor Gwynedd has a responsibility to create the environment that assures this, making it less likely that a child or adult is abused. These are the safeguarding arrangements that are outlined in this policy and are the responsibility of every service within Cyngor Gwynedd.
- 1.4. In contrast, Social Services has the lead responsibilities for protecting children and adults who may be suffering harm and neglect.
- 1.5. Employees of Cyngor Gwynedd and elected members are expected to act according to the principles set out in this policy at all times, whether during work hours or otherwise.

2. DEFINITIONS

- 2.1. "**Safeguarding**" is a wider concept than the protection of children and adults. It is the prevention of abuse or harm, a general function that deals with promoting:
 - physical, emotional, and mental health
 - safeguarding from harm and neglect
 - education, training, and leisure
 - their contribution to society
 - social and economic well-being
- 2.2. "**Protection**" is the response to concerns about the likelihood of significant harm of an individual, meaning a person at risk of abuse and neglect. The arrangements for protecting children and adults from abuse are outlined in the Wales Safeguarding Procedures.

3. LEGISLATION

- 3.1. Section 28 of the Children Act 2004:

Cyngor Gwynedd has a duty to ensure that it undertakes its functions from the perspective of the need to safeguard and promote the welfare of children.

3.2. Section 17 of the Crime and Disorder Act 1998:

Cyngor Gwynedd has a duty to ensure that every reasonable step is taken to protect adults and prevent crime and disorder when it undertakes its functions.

3.3. Section 7 of the Social Services and Well-being (Wales) Act 2014:

Cyngor Gwynedd has a duty to promote the well-being of people who require care and support. The Act defines well-being as something which has eight common aspects, one of which involves protection from abuse and neglect.

3.4. Section 2 of the Wales Safeguarding Procedures 2020:

Cyngor Gwynedd employees and volunteers have a duty to report about any child or adult considered to be at risk of abuse, neglect and/or harm.

4. PRINCIPLES

- 4.1. Safeguarding children and adults is the responsibility of everyone who represents or works on behalf of the Council.
- 4.2. It is never acceptable for a child or adult to be abused or be harmed in any way.
- 4.3. Every child and adult (whatever their background, culture, age, disability, gender, ethnicity, religious belief) has a right to participate in a safe society without any violence, fear, abuse, exploitation, bullying and discrimination.
- 4.4. Every child and adult have the right to be safeguarded from harm, exploitation, and abuse.
- 4.5. Cyngor Gwynedd will put the safeguarding and well-being of children and adults centrally in our policies and procedures.
- 4.6. Cyngor Gwynedd will work closely in partnership with children, their parents, carers and adults and other agencies to safeguard and promote the well-being of children and adults.
- 4.7. Cyngor Gwynedd recognises the importance of preventative work and early intervention to reduce the likelihood that abuse, or harm may occur.

5. ROLES AND RESPONSIBILITIES

- 5.1. All Councillors, members of staff, volunteers and contracted service providers are responsible for adhering to the guidance and guidelines noted in this Policy.

5.2. FUNCTIONS OF OFFICERS AND KEY MEMBERS

5.2.1. Statutory Director of Social Services

Name:	Telephone:	Email address:
Huw Dylan Owen	01286 679387	DylanOwen@gwynedd.llyw.cymru

- 5.2.1.1. The Statutory Director (Social Services) has the final and indivisible responsibility for safeguarding issues. The Statutory Director of Social Services will ensure that the Council has appropriate safeguarding measures and arrangements and is responsible for reporting to Councillors regularly on these arrangements.
- 5.2.1.2. The Statutory Director (Social Services) must remain aware of any potential conflict of interest between their role within social services' investigations and their responsibility for corporate safeguarding issues. If such a conflict arises the Director should recuse themselves from one of the roles for the duration of the situation which causes the conflict of interest.

5.2.2. Lead Director for Children and Young People

5.2.2.1. The Statutory Director of Social Services also holds the role of Lead Director for Children and Young People. This role, created by The Children Act (2004) is responsible for offering leadership and promoting a partnership when planning for implementing the United Nations' Convention on the Rights of the Child across the Council and with partners.

5.2.3. Elected Members

5.2.3.1. Every Councillor must act in accordance with the principles of this Policy and must follow the guidelines and procedures attached to the Policy in order to safeguard children and adults from harm and abuse.

5.2.3.2. Every elected member (Councillor) is expected to undertake training on safeguarding children and adults. A register will be kept of those attending and this will be reported as part of the performance monitoring arrangements co-ordinated by the Safeguarding Strategic Panel.

5.2.4. Cabinet Members

5.2.4.1. The Cabinet Members for Adults, Health and Wellbeing; for Education; and for Children and Families will lead on safeguarding across the Council.

Name:	Email address:
Cllr Elin Walker Jones <i>Cabinet Member - Children and Young People</i>	Cynghorydd.ElinWalkerJones@gwynedd.llyw.cymru
Cllr Dilwyn Morgan <i>Cabinet Member - Adults Health and Wellbeing</i>	Cynghorydd.DilwynMorgan@gwynedd.llyw.cymru
Cllr Beca Brown <i>Cabinet Member - Education</i>	Cynghorydd.BecaBrown@gwynedd.llyw.cymru

5.2.4.2. These Cabinet Members will be standing members on the Safeguarding Strategic Panel. Cabinet Members will report on the work of the Strategic Panel to the Care Scrutiny Committee, to the Cabinet and to the Full Council annually.

5.2.5. Care Scrutiny Committee

5.2.5.1. Members of the Care Scrutiny Committee will scrutinise and receive information regarding the work programme of the Strategic Panel.

5.2.6. Full Council

5.2.6.1. All Members of the Council will receive an Annual Report on the work of the Safeguarding Children and Adults Strategic Panel.

5.3. **FUNCTIONS OF COUNCIL DEPARTMENTS, MANAGERS AND STAFF**

5.3.1. Every Department within the Council must take full ownership of their safeguarding responsibilities and have clear arrangements and procedures in place to ensure that enquiries to allegations / concerns that children and adults may be suffering harm and/or neglect receive due consideration.

5.3.2. The Council is committed to train all staff in the field of safeguarding.

5.3.3.All Members of Staff and Volunteers

- 5.3.3.1. All members of staff and volunteers are responsible for undertaking their duties in a manner which safeguards and promotes the welfare of children and adults. They must also act in a way which protects them against false allegations of abuse as far as possible and in accordance with this Policy. They must bring issues of concern regarding the safety and welfare of children and adults to the attention of the Designated Safeguarding Individual within their Department.

5.3.4.Line Managers

- 5.3.4.1. Every Line Manager is responsible for ensuring that the staff for which they are responsible receive the safeguarding training they require and that the training is proportionate to their responsibilities. There are guidelines regarding which members of staff should receive training and to which level available by the Corporate Support Department.

5.3.5.Designated Safeguarding Individual

- 5.3.5.1. Every Department within the Council has nominated a “Designated Safeguarding Individual” which are responsible for:
- acting as a key source of advice and support for other staff in the Department on all safeguarding issues;
 - familiarising themselves with Cyngor Gwynedd’s Policy and Guidelines for Safeguarding Children and Adults along with the Wales Safeguarding Procedures and Child Protection Guidelines;
 - ensuring that there are effective internal procedures for dealing with concerns within the Department, working in close collaboration with Social Services to achieve this;
 - representing the Department on the Council’s Operational Panel for Safeguarding Children and Adults;
 - ensuring that the process of conforming with this Policy and Procedure is monitored by reporting regularly to the Departmental Management Team;
 - attending the relevant training for “Designated Safeguarding Individuals”;
 - ensuring that staff within their Department are compliant with all relevant training.
- 5.3.5.2. The Designated Safeguarding Individual for each department shall be a member of the Operational Safeguarding Group, which is aligned to the Strategic Safeguarding Panel. A list of all Designated Safeguarding Individual is available on Cyngor Gwynedd’s intranet.

5.3.6.Heads of Department

- 5.3.6.1. Every Head of Department – through their Management Teams – will be jointly responsible for an understanding of, and compliance with all statutory requirements in terms of safeguarding and promoting the welfare of children and adults. This includes quality, content and frequency of the training provided and maintaining sufficient staff training records.
- 5.3.6.2. Every Head of Department must ensure that all staff members in relevant posts are checked by means of the Disclosure and Barring Service (DBS) and that their staff conform

with the Policy and Guidelines for Safeguarding Children and Adults. Every Head of Department must establish arrangements to ensure that they comply with the requirements of the Council's Disclosure of Offences and Checking Criminal Records Policy. Every Head of Department must ensure that records are kept of every check undertaken by the DBS. Compliance in this area will be reported and scrutinised by the Safeguarding Strategic Panel

5.3.6.3. Every Head of Department must ensure that this Policy is employed, and that appropriate departmental procedures for Safeguarding Children and Adults are adopted. These procedures are expected to be prepared to highlight the Department's arrangements to respond to issues that could arise in the safeguarding field. The procedures will be required to fully comply with the Safeguarding Policy and Guidelines.

5.3.6.4. Every Department in the Council will be expected to report on their safeguarding procedures to the Safeguarding Children and Adults Strategic Panel. The Council's Management Group will convene all Heads of Department, Directors, and the Chief Executive on a monthly basis. There will be an opportunity at these meetings for any of the Heads to refer to safeguarding issues.

5.3.7. Contractors, Sub-contractors or Other Organisations funded by or on behalf of Cyngor Gwynedd

5.3.7.1. Contractors, sub-contractors or other organisations funded by or on behalf of the Council are responsible for arranging checks through the Disclosure and Barring Service (DBS) and ensuring that their staff comply with the appropriate Policy and Procedures for Safeguarding Children and Adults. They are also responsible for informing relevant managers of the Council about any concerns they may have and to refer to protection issues. It is the responsibility of the manager of the contract to ensure compliance with these requirements.

5.3.7.2. This responsibility, as set out in 5.3.7.1 should be included within all tender documents, agreements and contracts.

6. CORPORATE GOVERNANCE FRAMEWORK

6.1. Safeguarding Strategic Panel

6.1.1. The responsibility for undertaking an overview of the children and adults safeguarding arrangements has been delegated to the Safeguarding Strategic Panel by the Cabinet.

6.1.2. The main responsibilities of the Panel are to ensure that:

6.1.2.1. there are robust corporate and departmental arrangements in place to safeguard children and adults in Gwynedd.

6.1.2.2. there are clear and unambiguous communication arrangements in place across the organisation, including information about the key officers in each service who are responsible for children and adult safeguarding issues.

6.1.3. The Panel meets three times a year. Further details on the Safeguarding Strategic Panel can be found within its terms of reference.

6.2. Operational Safeguarding Group

6.2.1. The Operational Safeguarding Group is accountable to the Safeguarding Strategic Panel and acts in accordance with the guidance and requirements of that Panel.

6.2.2. The Operational Safeguarding Group will monitor performance across the services from the perspective of safeguarding children and adults. The Operational Safeguarding Group reports to the Safeguarding Strategic Panel at each of panel's meetings, highlighting any concerns or obstacles clearly.

6.2.3. The Operational Safeguarding Group will ensure that:

- There is a clear understanding amongst the Council's workforce, elected members and those working on behalf of the Council, of the policies and guidelines for the safeguarding of children and adults at risk of harm and/ or abuse.
- Each department within the Council has its own safeguarding procedures documented and utilised appropriately, aligned to the Council's Safeguarding Policy.
- Members, staff and volunteers receive appropriate and timely safeguarding information and training.
- Safer recruitment is undertaken and that the Disclosure and Barring Scheme is used consistently and effectively.

7. PROCEDURE FOR REFERRING A CONCERN

7.1. The Police must be contacted immediately if the child or adult is in immediate danger.

7.2. It is crucial not to delay.

7.3. Any member of staff or Elected Member with concerns regarding the safety of a child or adult should immediately contact:

The Children Services Duty Team on 01766 772577 (press option 1)

Or

The Adults Service Advice and Assessment Team on 01766 772577 (press option 2)

7.4. For any concerns regarding the safety of a child or adult outside usual office hours, **after 5.00 pm Monday to Friday and on weekends and Bank Holidays**, they should contact:

The Social Services Out of Hours Team on 01248 353551

7.5. If a member of staff has concerns regarding the behaviour of a colleague or needs advice about a concern/doubt about the safety of a child or adult, they should contact the Designated Safeguarding Individual in their Department. If the Designated Safeguarding Individual is unavailable, then the matter must be referred immediately to the Teams noted above.

8. REPORTING, MONITORING AND REVIEWING

8.1. The Annual Report of the Safeguarding Children and Adults Strategic Panel will report on the Council's performance in complying with the Safeguarding Policy and Guidelines. The Annual Report will be submitted to the Corporate Management Team, the Cabinet and to the Full Council.

8.2. This Safeguarding Policy will be reviewed annually or if any amendments occur in legislation or in consideration of changes in working practices which may stem from events or allegations.

ATTACHMENTS (TO BE REVIEWED BY THE OPERATIONAL SAFEGUARDING GROUP)

- Safeguarding Children and Adults Strategic Panel Terms of Reference
- Signs of Abuse
- Code of Conduct and Safe Working Practices
- Training on Safeguarding
- Disclosure of Offences and Checking Criminal Records
- List of Departmental Designated Managers
- Good Practice Guidelines for Councillors: Safe Contact with Children and Vulnerable Adults
- The Referral Process
- Dealing With Allegations of Professional Abuse
- Measuring Effect and Monitoring
- All Wales Safeguarding Procedures

Safeguarding Children and Adults Strategic Panel Terms of Reference

SAFEGUARDING CHILDREN AND ADULTS STRATEGIC PANEL TERMS OF REFERENCE

1. INTRODUCTION

- 1.1. Safeguarding children and adults is a priority for Cyngor Gwynedd. To ensure that suitable and appropriate safeguarding procedures are in force, the Statutory Director of Social Services convenes a Strategic Panel for Safeguarding Children and Adults, which represents Members and senior managers from all the Council's departments.
- 1.2. The Safeguarding Children and Adults Strategic Panel is expected to lead and advise on the safeguarding requirements contained in paragraphs 64-69 of Part 8 of the Social Services and Well-being Wales Act (2014).
- 1.3. All agencies also need to establish internal arrangements for ensuring that the counter-terrorism agenda, prevention of radicalisation, and community safety issues, receive the appropriate attention.
- 1.4. For the purpose of this Panel, the term 'safeguarding' applies to adults, children and young people and means preventing them from being abused or neglected and educating those around them to recognise the signs and dangers. Safeguarding, and promoting the welfare of individuals, is a broader term than 'protecting' individuals from being abused. It is about individuals and services recognising the risk factors and taking steps to prevent vulnerable individuals from being abused. Protection is part of the safeguarding and promoting well-being work. It refers to the activity of protecting children, young people and adults who suffer or are at risk of suffering significant harm because of abuse or neglect.

2. SAFEGUARDING STRATEGIC PANEL TERMS OF REFERENCE

- 2.1. The aim of the Panel is to give assurance to Members and to the Statutory Director of Social Services, as the senior officer within the Council who has full final responsibility for safeguarding children, young people, and adults, that suitable arrangements and procedures are in place at a corporate level to ensure the safeguarding of children, young people and adults. The Panel will fulfil 3 statutory duties, namely:
 - 2.1.1. general corporate duty to safeguard,
 - 2.1.2. Social Services statutory duty
 - 2.1.3. And the Community safety duty.
- 2.2. To meet these duties, the Panel is expected to:
 - 2.2.1. Identify any gaps in relation to safeguarding at corporate level and approve work programs to respond to these. Collaborate with the Safeguarding Operational Group to respond to any identified gaps.
 - 2.2.2. Identify lessons to be learned, at a corporate level, from reviews of serious cases and from other relevant reviews and ensure action on these. (Adult Practice Review, Child Practice Review and Domestic Homicide Review).

2.2.3. Identify lessons to be learned from external and internal audits and ensure action on these.

2.2.4. Inform relevant lead members of key issues/developments in the field of safeguarding children, young people, and vulnerable adults.

2.2.5. Be a vehicle to raise the awareness of all members of the Council's staff and all elected members of their responsibilities in relation to safeguarding.

2.2.6. Be a vehicle to ensure that staff members and elected members receive suitable training (for example the two mandatory VAWDASV and Prevention) in a timely manner, and monitor attendance at this training.

2.2.7. Ensure inter-departmental work correlation and effective communication within the Council in the field of safeguarding.

2.2.8. Ensure inter-departmental work correlation and effective communication within the Council in the field of safeguarding.

2.2.9. Ensure an overview of wider Safeguarding issues including counter-terrorism procedures, modern slavery, domestic violence, and community safety.

3. PERFORMANCE MONITORING

3.1. The Safeguarding Strategic Panel will have a responsibility to monitor and challenge performance relating to the Safeguarding field.

4. CHAIRSHIP

4.1. The Panel shall appoint a Chair and a Vice-Chair every two years.

5. FREQUENCY OF MEETINGS

5.1. The Panel will meet three times per year.

6. GOVERNANCE AND ACCOUNTABILITY

6.1. The Safeguarding Strategic Panel is accountable to Cabinet. An Annual Report will be submitted to Cabinet on an annual basis. The Annual Report will also be submitted to the Full Council on an annual basis.

6.2. Business management [i.e. formulating a work programme, meetings programme, 'secretariat', central communication point, organising additional professional advice (if necessary)] is the responsibility of the Corporate Support Department.

7. MEMBERSHIP

Title
Children and Supporting Families Cabinet Member
Adult, Health, and Wellbeing Cabinet Member
Education Cabinet Member
Cabinet Member with responsibility for Community Safety
Corporate Support Cabinet Member
Chief Executive
Corporate Director
Statutory Director of Social Services
Head of Department for Children and Family Support
Head of Education
Head of Adults, Health, and Wellbeing
Head of Corporate Support
Chair of the Operational Safeguarding Group
Head of Legal Service
Anglesey and Gwynedd Safety Partnership Manager
Senior Child Protection and Quality and Family Support Manager
Senior Safeguarding, Quality Assurance and Mental Health Manager

CYNGOR GWYNEDD – Report to a meeting of Cyngor Gwynedd Cabinet

Item Title:	<i>Delivery Agreement, Local Development – Response to the public consultation period</i>
Cabinet Member:	<i>Councillor Dafydd Meurig – Cabinet Member Environment</i>
Contact Office:	<i>Gareth Jones – Assistant Head Environment Department</i>
Date of the meeting:	<i>20 February 2024</i>

1. The decision sought

That the Cabinet

- i) Agree to present the amended Draft Delivery Agreement to the Full Council for approval.
- ii) Delegate the right for the Head of Department to make editorial changes for accuracy as required.

2. Reason why the Cabinet need to make the decision:

- 2.1 Preparing and receiving approval of the Delivery Agreement is the statutory first step associated with the process of preparing a new Local Development Plan for the Gwynedd Local Planning Authority area.
- 2.2 In accordance with the governance arrangement relating to the preparation of the new Local Development Plan and other Planning Policy matters, the Delivery Agreement has already been presented to the Planning Policy Working Group for their consideration. Dependent upon the decision of Cabinet, the Delivery Agreement will be presented to the Full Council for final approval to submit the document to Welsh Government.
- 2.3 This purpose of this Report is to present the Delivery Agreement and the accompanying Consultation Report. Further the comments of the Working Group have been included for Cabinet's consideration.

3. Introduction and rationale

3.1 Background

- 3.1.1 The Planning and Compulsory Purchase Act 2004¹ requires local planning authorities in Wales to prepare a Local Development Plan (LDP) for their areas. A Delivery Agreement (DA) must be prepared before it can progress to the formal process of preparing the LDP. During the Public Examination the Independent Inspector will ensure that the LDP has been prepared in accordance with the Delivery Agreement (forms part of the soundness tests). It is therefore emphasised that the content of the DA and the means of implementation is central in the preparation of a sound LDP. The Delivery Agreement requires the approval of the Full Council and Welsh Government.

¹ [Planning and Compulsory Purchase Act 2004](#)

Following their approval, the formal process of preparing a new Local Development Plan will commence.

3.2 Content

3.2.1 The DA is split in two parts as stated below :

1. Timetable of key steps for preparing the new LDP; and
2. A Community Involvement Scheme that sets out how and when stakeholders and the public can contribute to the process of preparing the Plan.

3.2.2 The purpose of the DA is to set out a timetable for the preparation of the LDP and also to set out how Council intends to involve the local community and other stakeholders in the preparation of the new Local Development Plan. The Delivery Agreement provides details of the different stages of the process and how and when stakeholders and the public are able to participate.

3.2.3 The timetable laid out at the DA is challenging however it is achievable. In drafting the timetable consideration has been given to the Welsh Government's expectations set out in the Development Plans Manual (March 2020)², which is that a Local Development Plan needs to be prepared within 3.5 years. In accordance with the timetable set out in the Delivery Agreement it is anticipated that the new LDP will be formally adopted in September/October 2027. Adhering to the timetable and the individual steps is important in order to ensure that the Plan is prepared within the specified three and a half years.

3.2.4 The timetable has been divided into definitive and indicative stages. There is more control involved with when the definitive steps will be undertaken, therefore it is possible to prepare a timetable and associated reporting schedule for these steps. On the other hand, with the indicative steps these steps are dependent on factors beyond the Council's control, such as the number of representations received during the public consultation period and the Planning and Environment Decisions Wales (PEDW) programme of work to carry out the Examination.

3.2.5 The LDP regulations³ set out the need to consult at specific stages of the LDP preparation process. It is emphasised that undertaking public consultation periods is a means of seeking “...*greater consensus and strengthen community involvement in evidence-based plan making...*” (Development Plans Manual March 2020). The Community Involvement Scheme which is included in the Delivery Agreement outlines how individuals, agents, organisations and others can be involved the preparation of the LDP. It sets out the ways in which the Council will engage and when there will be opportunities for people to contribute to the process of preparing the Plan.

3.3 Public consultation period

² [Local Development Plan Manual \(March 2020\)](#)

³ [The Town and Country Planning \(Local Development Plan\) \(Wales\) Regulations \(2005\)](#)

- 3.3.1 Following a decision by the Cabinet (10 October 2023) to publish the Delivery Agreement for a public consultation period, the consultation period has been undertaken. This report presents the results of the consultation period (Appendix 1).
- 3.3.2 There is a statutory requirement to consult with general and specific consultation bodies on the contents of the Delivery Agreement. However, it was considered necessary to exceed these statutory requirements through wider public consultation.
- 3.3.3 Awareness of the public consultation period was raised by: -
- Informing statutory and non-statutory stakeholders;
 - Notifying local members;
 - Notifying Community/Town/City Councils;
 - Notifying neighbouring Local Authorities;
 - Notifying individuals/organisations who have declared an interest in the LDP (contacts database, 1,316 in number);
 - Sharing regular messages on the Council's social media sites (Facebook, Instagram and X (formally Twitter)).
- 3.3.4 Further it was ensured that the relevant material required to facilitate the submission of representations including the Draft Delivery Agreement and the Integrated Impact Assessment (see Appendix 3) were available for inspection in the following locations:-
- Hard copy at Siop Gwynedd Caernarfon, Dolgellau and Pwllheli;
 - Hard copy in the public local libraries;
 - Council website
- 3.3.5 To facilitate the process of commenting on the Draft Delivery Agreement a representation form (hard copy and interactive copy) was provided. The form asked general questions on the various sections of the Draft Delivery Agreement, with a total of 9 specific questions asked.
- 3.3.6 The public consultation period took place between 26 October 2023 and 7 December 2023. 14 individuals/organisations responded to the consultation with a total of 37 comments.

3.4 Responses - Public Consultation Period

- 3.4.1 All comments received during the public consultation period can be examined in Appendix 1. Along with the comments it is possible to examine the Council's draft response to them and the recommendation resulting from the comment.
- 3.4.2 It is noted that there were no significant issues arising from the comments received. Some of the comments and suggestions as to how to amend the document have been accepted and as a result the document has been amended accordingly. It is considered that these amendments add value and clarity to the Delivery Agreement.

3.4.3 Any amendment(s) proposed to the draft Delivery Agreement in response to comments received can be found in Appendix 2. Amendments which are additions are displayed in **bold font and underlined** with any deleted text displayed with a ~~strike through~~.

3.4.4 Along with the Draft Delivery Agreement, an Equality Impact Assessment has been prepared. Following the public consultation period, this assessment has been revised. It can be examined in Appendix 3. The second version of the Assessment has taken into account the representations received during the consultation period, and outlines the fact that it is not anticipated that the Delivery Agreement will have a negative impact on the equality characteristics, the Welsh language and the socio-economic disadvantage.

3.5 Equality Act 2010

3.5.1 The Council is subject to public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics and having due regard to the socio-economic duty under Section 1 of the Act. Along with the Draft Delivery Agreement an equalities impact assessment has been prepared. The Cabinet will need to have regard to its findings when coming to a decision. Following the period of public consultation this assessment has been amended. It can be viewed in Appendix 3.

3.6 Well-Being of Future Generations (Wales) Act 2015

3.6.1 The Well-Being of Future Generations (Wales) Act 2015 relates to improving the social, economic, environmental and cultural well-being of Wales. The Act places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language and is globally responsible. The Delivery Agreement have been prepared having regard to these requirements and in accordance with the 5 ways of working.

3.7 Working Group's Comments

3.7.1 The Delivery Agreement along with the accompanying Consultation Report were presented to a meeting of the Planning Policy Working Group which was held on January 26, 2024. As part of the discussion, the following issues were raised:-

- i. It was questioned why some community initiatives have been listed in Appendix 6, and others excluded.
- ii. Following comments received as part of the public consultation period, it was questioned if it would be possible to amend the soundness tests associated with the preparation of the Local Development Plan to ensure that consideration of impact on the Welsh language was part of the tests.

3.7.2 The following response was provided:-

- i. Cymunedoli has been identified as a non-statutory stakeholder listed in Appendix 6 of the Delivery Agreement. Cymunedoli is a network of community initiatives and businesses and are therefore used as a central point of contact between the Council and the community initiatives in the preparation of the Plan. However, it is agreed that it would be useful to include details of all the community initiatives as non-statutory stakeholders and on our contacts database. Therefore, Appendix 6 of the Delivery Agreement has been amended accordingly.
- ii. Section 64(2) of the 2004 Act⁴ states that LPAs should not submit LDPs unless they consider the Plan is ready for inspection. This means that 'unsound' plans should not be submitted for inspection. The LPA will need to show that the plan meets the three soundness tests set out in Table 27 of the Local Development Plans Manual. The questions listed under each test will be ones the Inspector will consider in determining whether the Plan is sound.

It is noted that the comment received relates to and includes a reference towards ensuring that consideration has been given to the impact of the LDP on the Welsh language. The purpose of the tests is to assess if the LDP is doing what it has set out to do. The purpose of the tests is not to assess the impact of the plan in detail, nor to look at aspects specifically affected. If there is a question specifically on one aspect this can lead to the loss of an accurate assessment of the impact as a whole. Several important aspects can be the subject of a specific question to measure and adding one on Welsh can lead to a desire to add other aspects. It is felt that adding a specific question on the impact of the LPD on the Welsh language may not be the best way to assess the language as the impact on the Welsh language will be assessed throughout each test. If we specify a specific question on the impact on the Welsh language, this can result in an assessment of the Welsh language being removed from all other questions and therefore missing a fuller picture of the impact. The impact on the Welsh language should be pervasive throughout every question. There are also questions within each test enabling the Welsh language to have a full assessment. This will mean that the LPD is assessed on its soundness and not on specific content at this stage.

Further to the above completing an impact assessment on the Welsh language is a statutory requirement on the Council due to the Equality Act, and the inclusion of this assessment should be considered in any report. It is also incumbent on the Council, in undertaking the Sustainability Appraisal to consider the likely impacts of the Plan on the use of the Welsh language in the plan area. (section 62(6A) PCPA 2004 as inserted by section 11, Planning (Wales) Act 2015). This is to ensure that the scale and location of the change set out in the plan supports the Welsh language and to ensure that appropriate mitigation measures are in place, if necessary. It is also important to note that the LDP should be assessed against the Wellbeing Act 2015 and that the aims of this Act include assessing the impact on the Welsh language (Wales and a vibrant culture in which the Welsh language thrives).

Accordingly, there is no need to amend the soundness tests in accordance with the observation, as, in essence, what is already sought is addressed in the soundness tests in its present form and by statutory requirements on the Council.

⁴ [Planning and Compulsory Purchase Act 2004](#)

4.0 Rationale and justification for recommending the decision

- 4.1 In accordance with the duty imposed in the Planning and Compulsory Purchase Act (2004) it is requirement for Local Planning Authorities to prepare a Local Development Plan for their areas. The preparation and approval of the Delivery Agreement is the first statutory step involved in the preparation of the Plan.
- 4.2 In accordance with the requirements set forth in the Regulations the public consultation exercise has been undertaken and appropriate consideration has been given to the comments received. It is therefore requested that the Cabinet approve the revised Consultation Report and Delivery Agreement for submission to the Full Council

5.0 Next steps and timetable

Meeting	When	Decision
Full Council	March 2024	It is agreed to submit the Delivery Agreement to the Welsh Government for agreement and we will formally undertake the process of preparing the LDP.
Present to Welsh Government	March 2024	Following the meeting of the Full Council the DA will be presented to Welsh Government for approval. Welsh Government will have 4 weeks to approve.

4.0 The views of the statutory officers

4.1 Head of Finance

Nothing to add from the perspective of financial propriety.

4.2 Monitoring Officer

The report has been the subject of advice and input from Legal Services. I am therefore satisfied with it's propriety.

List of appendices:

Appendix 1 – Consultation Report

Appendix 2 - Delivery Agreement – final version including the amendments following the public consultation period

Appendix 3 - Equality Impact Assessment

Question 1:

Name	Comment. Ref	1. Do you have any comments on Part 1: Content? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
Chris Jones (Bwrdd Iechyd Prifysgol Betsi Cadwaladr)	CC7.1	The LDP consultation document would benefit from a simple (easy-read) single sentence at the very beginning, explaining what an LDP is and what it is for. The rest of the document is clear and practical, but it does assume background knowledge. 1.6 Although the joint working arrangement between Cyngor Gwynedd and IOACC on planning policy matters (and a Joint LDP) has come to an end, we support their intention to work together when opportunities arise to commission pieces of work on a joint basis. 1.7 Compliance with Future Wales: National Plan 2040 - Outlined priority to improve the health and well-being of our communities aligns with the Health Board's strategic objectives	It is agreed with the principle of including an additional paragraph in the introduction that highlights what the purpose of the LDP. Hopefully, by doing so it will improve the reader's understanding of the document. Recommendation Amend the Delivery Agreement by including paragraph 1.1.2, which highlights the purpose of LDPs.
Aled Evans	CC8.1	Yes. Part 1.4 - Soundness Tests page 6 and appendix 4 - Soundness Tests page 48 I note - When the Anglesey and Gwynedd Joint Local Development Plan was adopted 28/7/2017 I think there was some confusion or misunderstanding about the term "sound". It	The process of preparing and receiving approval of a Local Development Plan is set out in legislation, therefore the Plan is required to be prepared in accordance with the statutory requirements. It is noted that the additions proposed to the soundness tests relate to the impact of the Plan on the Welsh language. The impact of the Plan on the Welsh language will be

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	1. Do you have any comments on Part 1: Content? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
		was assumed by some that the Council was adopting a Plan that was sound in the eyes of the Council and aligned with the Council's aspirations. In this way bound to protect the interests of the Welsh language in the county. However, 1700 objections to the Plan were not considered nor were the aspiration of a special meeting held in March 2016 to measure the impact of the LDP on the Welsh language. I further note - Paragraph 1.4.2. "The Inspector will undertake a Public Examination that will decide whether or not the LDP is sound." The soundness tests of the Inspector, the government representative, the planning inspectorate, are the tests and therefore, to a very large extent, the aspirations of the government and their policies will take precedence. As part of the soundness tests set out in Appendix four I would add the following three questions - Test 1 is the plan suitable? – additional question Does the Plan take into account the impact	considered (section 62(6A) of PCPA 2004 as inserted by section 11, Planning (Wales) Act 2015) and will be done in the form of the Sustainability Appraisal. Recommendation Note the comment. No Change.

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	1. Do you have any comments on Part 1: Content? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
		of the Plan on the number and percentage of Welsh speakers in Gwynedd? Test 2 - is the plan appropriate? – additional question Is it clear that protecting the Welsh language is part of the Plan as and is in the majority of Gwynedd's policies. Test 3 – Will the plan achieve ?- (will it likely be effective) additional question? Is it being monitored effectively? And will the impact of the houses being built and their location be monitored and their impact on the language?"	
Cyngor Cymuned Llanystumdwy	CC11.1	Yes. Part 1.4 - Soundness Tests page 6 and appendix 4 - Soundness Tests page 48 I note - When the Anglesey and Gwynedd Joint Local Development Plan was adopted 28/7/2017 I think there was some confusion or misunderstanding about the term "sound". It was assumed by some that the Council was adopting a Plan that was sound in the eyes of the Council and aligned with the Council's aspirations. In this way bound to protect the interests of the Welsh language in the county. However, 1700 objections to the	The process of preparing and receiving approval of a Local Development Plan is set out in legislation, therefore the Plan is required to be prepared in accordance with the statutory requirements. It is noted that the additions proposed to the soundness tests relate to the impact of the Plan on the Welsh language. The impact of the Plan on the Welsh language will be considered (section 62(6A) of PCPA 2004 as inserted by section 11, Planning (Wales) Act 2015) and will be done in the form of the Sustainability Appraisal. Recommendation

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	1. Do you have any comments on Part 1: Content? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
		Plan were not considered nor were the aspiration of a special meeting held in March 2016 to measure the impact of the LDP on the Welsh language. I further note - Paragraph 1.4.2. "The Inspector will undertake a Public Examination that will decide whether or not the LDP is sound." The soundness tests of the Inspector, the government representative, the planning inspectorate, are the tests and therefore, to a very large extent, the aspirations of the government and their policies will take precedence. As part of the soundness tests set out in Appendix four I would add the following three questions - Test 1 is the plan suitable? – additional question Does the Plan take into account the impact of the Plan on the number and percentage of Welsh speakers in Gwynedd? Test 2 - is the plan appropriate? – additional question Is it clear that protecting the Welsh language	Note the comment. No Change.

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	1. Do you have any comments on Part 1: Content? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
		is part of the Plan as and is in the majority of Gwynedd's policies. Test 3 – Will the plan achieve ?- (will it likely be effective) additional question? Is it being monitored effectively? And will the impact of the houses being built and their location be monitored and their impact on the language?"	
Mike Stevens	CC14.1	Para 1.5.4 The HRA must take greater notice and support for south Gwynedd and Tywyn area which in the previous JLDP was very badly served. The south of Gwynedd was downgraded to stifle development. Tywyn is the "Mother" town of the south with six large villages who look to the town as their resource centre. Remote officers in Caernarfon have little concern or focus for the area. Gwynedd Council must site a regional office in Tywyn.	When the process of preparing the Local Development Plan progresses further consideration will be given to the role of settlements in servicing the wider community. Recommendation Note the comment. No Change.

Question 2:

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	2. Do you have any comments on Part 2: The Resources and the Timetable? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
Graham Davies	CC3.2	Paragraph 2.1.2 , the process seems to be reliant a small team of staff which exposes the process to delays in the event of absences or team members leaving. From the time allocation it appears that the team will also fulfil other duties further exposing the process to delays when prioritising workload and the demand from line managers. Is there a reason why there are 2 Team leaders, who would be managing who ? Paragraph 2.3.2 Stage 2 Call for sites - The period noted March/ April 2024 is too short. How will prospective landowners be made aware that the Council is looking for prospective development sites . It is now November 2023, 4 months from the proposed period. I think a 6 month period would be more suitable and would give the opportunity through advertisement, word of mouth etc for landowners to consider if they would like their land to be considered thus potentially delivering quality land for consideration.	It is acknowledged that the process of preparing a new Local Development Plan within the timeframe set out is challenging, however the Planning Policy Service staff have extensive experience in preparing Development Plans which is advantageous. It is noted that the Service has a good cross-departmental relationship with other Services who participate in the preparation of the new Plan. Furthermore, funding has been earmarked to undertake specialist research work (when necessary and appropriate) which will facilitate the process and ease the burden on staff. It is emphasised that the timeframe highlighted in the Delivery Agreement indicates the intention to undertake the Call for Sites period for at least 6 weeks. Further consideration will need to be given to the practicality and benefit of opening the Call the Sites period for longer than 6 weeks, noting the need to adhere to the timeframe of the statutory steps set out in the Delivery Agreement. Recommendation Note the comments. No change.
Aled Evans	CC8.2	It should be ensured that the plan is adopted or rejected before the end of the current	The timetable set out in Part 2 of the Delivery Agreement has been prepared by taking into account the need to

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	2. Do you have any comments on Part 2: The Resources and the Timetable? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
		Council . The Anglesey and Gwynedd Plan was adopted only about 3 months into the 2017 Council. Because of this about a third of councilors voting were unfamiliar with the whole thing. Unsatisfactory situation.	follow the prescriptive statutory steps. In line with Government Guidance a new Plan needs to be prepared within a period of three and a half years. It is therefore noted that in light of the requirements it is not possible to programme the preparation and adoption of the new Plan within a period less than the timeframe stipulated. Further it is worth emphasising that due to the pre-election period (the local election in 2027) it would mean the need to adopt the Plan before the end of March 2027 at the latest, which is a period of less than three years. In order to ensure the success of the Plan and to have due regard to all related necessary aspects the timetable prepared is considered reasonable. Recommendation Note the comments. No change.
Cyfoeth Naturiol Cymru	CC10.2	We note the timescales for the plan preparation.	Recommendation Note the comments. No change.

Question 3:

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	3. Do you have any comments on Part 3: Risk Management? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
Chris Jones (Bwrdd Iechyd Prifysgol Betsi Cadwaladr)	CC7.3	We appreciate that consideration for mitigation of risk has been presented thoroughly.	Recommendation Note the comment. No change.

Question 4:

Name	Comment. Ref	4. Do you have any comments on Part 4: Monitoring and Reviewing? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
Chris Jones (Bwrdd Iechyd Prifysgol Betsi Cadwaladr)	CC7.4	This section is thorough, no specific comments.	Recommendation Note the comment. No change.

Question 5

Name	Comment. Ref	5. Do you have any comments on Part 5: Scope of the Community Involvement Scheme? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
Sian Parri	CC1.5	Also amend para 5.4.2 to include linguistic. 5.4.2 Every stage of the LDP process will have to be the subject of a SA. SA is a	Amending the wording of para 5.4.2 to include reference towards language will add clarity and accuracy to the Delivery Agreement and the requirements associated with the Sustainability Appraisal.

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	5. Do you have any comments on Part 5: Scope of the Community Involvement Scheme? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
		technical process but interested parties are given an opportunity to submit observations. Work that will have to be completed early on during this process will be to revisit the evidence base that supports the SA, which prepares information about the linguistic, social, economic and environmental characteristics of the area. This evidence base and other information will form a part of the Scoping Report. This Report will be the subject of a formal public consultation.	Recommendation Accept - Amend para 5.4.2 accordingly.
John Ratcliff	CC2.5	Para 5.8 - Special consideration should be given to involvement of the Climate Change Programme Manager in this process, noting the key strategic importance of climate change in the sustainability of the development plan. Additional resource may be	It is necessary to ensure that due attention to matters relating to climate change is addressed within the new Plan. To this end, and to demonstrate its importance, it is agreed to amend paragraph 5.8.1 to refer to climate change as an example of a subject that will be discussed in a Cross-Departmental Executive Meeting. Recommendation Amend paragraph 5.8.1 in order to refer to the intention to hold a Cross-Departmental Operational Meeting in relation to Climate Change.
Graham Davies	CC3.5	Appendix 5 Item 2 - are the team members noted above taken from the existing planning team and if so can the Planning Department function with these team members having the majority of their time allocated to this work. If they can not, will	The team which are primarily responsible for preparing the Local Development Plan is the Planning Policy Service, which is a separate service from the Development Management Planning Service. Therefore, the preparation of the new Plan will not affect the Development Management service's ability to respond to and process

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	5. Do you have any comments on Part 5: Scope of the Community Involvement Scheme? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
		the priority not shift to ensure the ongoing planning process of processing planning applications does not falter by failing to administer applications in the statutory timescale which would no doubt highlight an under resourced department and also delay the delivery of the LDP?	planning applications within the specified timeframe. Recommendation Note the comment. No change.
Thomas Brooks	CC6.5	It is vital that, as required, the Council works in partnership with stakeholders and communities throughout the process. The draft Delivery Agreement does not give me confidence that the Council necessarily will. The Bodies listed in Appendix 6 are “umbrella” organisations, who general opinions and information base does not usually stretch down to local issues. For example, under bodies representing various religious groups you list ‘Congregational Federation Wales’. It cannot possibly cover all of the relevant issues that affect vulnerable localities, such as Borth-y-Gest. As Joint Secretary of Capel Bethel, Borth-y-Gest, I would wish to be alerted to all information that might affect our Church community.	Ensuring the input of communities in the preparation of the Development Plan is absolutely essential. Any organisation/charity/individual interested in the Plan has the opportunity to contact the Planning Policy Service with their contact details. Those details will be added to the Development Plan contacts database, meaning they will be notified during the key phases of Plan preparation and the opportunity(s) to provide input into the process. Recommendation Note the comment. No change.
Chris Jones (Bwrdd Iechyd Prifysgol Betsi Cadwaladr)	CC7.5	This is well-prepared, and we would suggest that specific consideration be given to carefully applied use of social media in this	Recommendation Note the comment. No change.

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	5. Do you have any comments on Part 5: Scope of the Community Involvement Scheme? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
		process. 5.2.1 Definitely support and encourage involvement of communities early in the LDP process	
Walis George (Cymdeithas yr Iaith)	CC9.5	We welcome the commitment in part 5 to provide diverse opportunities for local people and communities to participate fully in the preparation of a new Local Development Plan from the outset. It is encouraging that the first paragraph refers to the Well-being of Future Generations Act and the five ways of working. The sustainable development principle and the well-being goals of the Act should be the cornerstone of this process and the whole planning system in Wales. In contrast to the process outlined in draft Delivery Agreement, communities within the Gwynedd Local Planning Authority area should be leading the Local Development Plan process with the professional support of Council officers. The housing and land use policies in the new Local Development Plan should be based on detailed local needs assessments in partnership with the communities themselves, rather than theoretical estimates of need and demand	It is agreed that the goals of the Wellbeing Act should be the cornerstone of the Plan. There is a duty on the Council, throughout the process of preparing the Plan to demonstrate how the Plan meets the requirements of the well-being goals. Receiving input from the public and the communities of Gwynedd is a core part of the Plan preparation. The Council's role will be to consider the needs and aspirations of Gwynedd communities and seek to achieve that vision within the Plan, as long as it is consistent with relevant national and regional planning policy guidance. Part 5.6 to 5.9 of the Development Plans Manual (3 Edition, March 2020) refers to Place Plans. It notes "...Place Plans should be in conformity with the development plan and adopted by the LA as SPG to the plan..." further it states "...Place Plans are not part of the statutory development plan; instead they add detail to the adopted plan..." Further Planning Policy Wales and the Manual refers towards the requirement for the Development Plan to be supported by a Local Housing Market Assessment.

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	5. Do you have any comments on Part 5: Scope of the Community Involvement Scheme? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
		as is usual through Local Housing Market Assessments. We would draw particular attention to the provision in Planning Policy Wales for communities to produce Place Plans. The results of the Community Assessments would provide a 'real' evidence base for a community planning process. A community planning process should provide opportunities for the local population to agree housing solutions to suit their needs and to directly influence the allocation of sites for affordable and open market housing in the Local Development Plan. In addition, the priorities of each Place Plan should be reflected in the local authority's Local Housing Strategy, specifically the Social Housing Grant Prospectus which summarises housing need and confirms the housing projects the authority wants to provide with a Welsh Government Social Housing Grant. Such a system would establish the Council's accountability to local communities throughout the development and implementation stages of the Local Development Plan and Local Housing Strategy.	It must be remembered that the Plan is for a period of 15 years (2024 to 2039) while a detailed assessment of housing needs is only updated every 5 years.
Cymunedoli Cyf	CC13.5	"Paragraph 5.4.1: We would like to indicate our desire to participate in your evidence	The respondent's willingness to assist with the preparation

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	5. Do you have any comments on Part 5: Scope of the Community Involvement Scheme? Please indicate which paragraph number(s) and/or page number(s) you are commenting on.	Council Response
		base gathering and topic papers (as noted in Appendix 2: Pre-deposit Period). Paragraph: 5.4.2: We would like to indicate our desire to participate in your evidence base gathering (as noted in Appendix 2: SA Scoping Report) and request the opportunity to join you in any steering group meetings."	of the new Local Development Plan is welcomed. Contact details for Cymunedoli are already on our database of non-statutory stakeholders, which means that they will receive correspondence from the Planning Policy Service (when appropriate) relating to opportunities to contribute and provide input into the preparation of the Plan. Recommendation Note the comment. No change.
Mike Stevens	CC14.5	Para 5.2.2 it is vital to encourage and have input from groups and associations in each area. Too often Community Councils and Councillors many un-elected don't speak for everyone. Business organisations have very specific views so must be included.	Agreed with the comment. Any individuals, organisation or business interested in the Local Development Plan are encouraged to contact the Planning Policy Service to request including their contact details on our contacts bastata. When appropriate an effort will also be made to target specific interest groups. Recommendation Note the comment. No change.

Question 6

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	6. Can you identify any additional statutory, specific and general consultation bodies to those listed in Appendix 6 of the draft DA (see appendix 6)?	Council Response
Sian Parri	CC1.6	Please include Cyfeillion Llyn in the list of consultees.	It is agreed that Cyfeillion Llyn should be added to the list of General Consultation Bodies in Appendix 6. Recommendation Amend Appendix 6 accordingly.
John Ratcliff	CC2.6	Include Gwynedd Archaeological Trust (Heneb: The Trust for Welsh Archaeology) in Appendix 6.	It is agreed that Gwynedd Archaeological Trust should be added to the list of General Consultation Bodies in Appendix 6. Recommendation Amend Appendix 6 accordingly.
Richard Mills	CC4.6	Mon a Gwynedd Friends of the Earth should be replaced with North West Wales Climate Action. The former group is defunct, and the latter group has in effect replaced it.	It is agreed to amend and include reference to North West Wales Climate Action for accuracy. Recommendation Amend Appendix 6 accordingly.
Thomas Brooks	CC6.6	Yes, interested locality organisations. In my community of Borth-y-Gest, the Friends of Borth-y-Gest have regularly contributed to local development plan processes. In current circumstances, I have requested involvement on behalf of Capel Bethel, Borth-y-Gest in answer to question 5 above.	Ensuring the input of communities in the preparation of the Development Plan is absolutely essential. Any organisation/charity/individual interested in the Plan has the opportunity to contact the Planning Policy Service with their contact details. Those details will be added to the Development Plan contacts database, meaning they will be notified during the key phases of Plan preparation and the opportunity(s) to provide input into the process. Recommendation Note the comment. No change.

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	6. Can you identify any additional statutory, specific and general consultation bodies to those listed in Appendix 6 of the draft DA (see appendix 6)?	Council Response
Chris Jones (Bwrdd Iechyd Prifysgol Betsi Cadwaladr)	CC7.6	The consultees are well listed. We suggest adding the following bodies: • Play Wales – representing children’s needs for play space • Croeso Menai – connect with the voice of our newest and most vulnerable citizens • The National Residential Landlords Association • Within the Welsh Culture section, ensuring that Welsh local history is included as part of understanding what land and spaces mean to people.	It is agreed to amend appendix 6 for accuracy. Recommendation Amend Appendix 6 accordingly.
Cymunedoli Cyf	CC13.6	Page 59-60 of Appendix 6: It is not only the language that bodies such as Cymunedoli Ltd, Ogwen Partnership and Dyffryn Nantlle 20:20 represent. We would like to see another subheading here with the title "bodies representing the interests of Gwynedd Community Initiatives" and list the above three groups under this title. The 5 aims of the Wellbeing Act 2015 are within the range of the Community Initiatives together with the economic, environmental and social interests of the area they represent.	The comment is noted and it is agreed that the title of the heading does not fully reflect the duties/interests of the groups listed under the heading. Instead of including a new heading, it is proposed to amend the wording of the existing heading. Recommendation Amend the wording of the title to read:- Bodies representing the interests of the Welsh language and Gwynedd communities

Question 7:

Page 48

Name	Comment. Ref	7. Do you have any additional comments or suggestions in relation to the Draft Delivery Agreement?	Council Response
Thomas Brooks	CC6.7	Only that consultation with local communities is vital in producing any generally agreeable local development plans	Agree with the comment. Recommendation Note the comment. No change.
Chris Jones (Bwrdd Iechyd Prifysgol Betsi Cadwaladr)	CC7.7	We conclude that it is robust and comprehensive in its considerations. The authors have done a careful job of citing the relevant strategy and policy context, have clearly set-out a timetable for consultation and delivery of identified steps, and have indicated the intent to engage with communities, including individuals with protected characteristics and the 'need to reach ' populations. The need for links to natural spaces is there, as is the need to protect and preserve the environment and to create developments that enhance and support population wellbeing. Whilst this marks a departure from developing a joint LDP with Isle of Anglesey Council, the document cites a clear intent to consider input from neighbouring authorities and to collaborate with other authorities on areas of development that necessitate this. From a health perspective we see no risks in this Delivery Agreement and would be happy to support the actions described.	Recommendation Note the comment. No change.
Cyfoeth Naturiol Cymru	CC10.7	We would like to offer informal engagement with your team throughout the plan	Recommendation Note the comment. No change.

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	7. Do you have any additional comments or suggestions in relation to the Draft Delivery Agreement?	Council Response
		preparation process, e.g., supplying environmental data and other GIS layers.	
Helena Jones	CC12.1	As I have previously put forward the piece of land I owe in Pontllyfni, I was told that it could not be considered as Pontllyfni is not a village but a cluster, I feel that this should be changed. We have a primary school here and I would say plenty of properties to say its a village. The land we have was before said to be just outside the development boundaries and now its because its cluster. Therefore I feel strongly that Pontllyfni should not come under the cluster category	The comments submitted are not of relevance to the Delivery Agreement. If appropriate, the respondent is encouraged to submit a representations during the relevant consultation period of the Local Development Plan. Recommendation Note the comment. No change
Mike Stevens	CC14.1	Looks very good	Recommendation Note the comment. No change.

Question 8:

Name	Comment. Ref	8. Are there any changes to the process outlined in the Delivery Agreement that can be made to ensure that we gather and hear the views of the public and key stakeholders on matters relating to the Welsh language?	Council Response
Aled Evans	CC8.8	I think I already noted this. But I hope that the Welsh language and the	Considering the likely impacts of the LDP on the Welsh language is an essential element of the Sustainability

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	8. Are there any changes to the process outlined in the Delivery Agreement that can be made to ensure that we gather and hear the views of the public and key stakeholders on matters relating to the Welsh language?	Council Response
		attention to it will not be buried as it were. In other words, that it is being treated and considered under the well-being act for example.	Appraisal. The LDP Manual encourages undertaking the integrated approach to impact assessment when undertaking LDP preparation, noting that it offers an opportunity to undertake an assessment that is more transparent, proportional and comprehensive. A yet a decision hasn't been made on whether to undertake an integrated assessment or to carry out an individual assessment in relation to a Welsh Language Impact Assessment, further consideration will be given to this as the preparation of the Plan progresses. Recommendation Note the response. No change.
Walis George (Cymdeithas yr Iaith)	CC9.8	Establish an engagement procedure with the Gwynedd Language Forum which includes a number of organisations representing the interests of the Welsh language in the county.	The Gwynedd Language Forum has been identified as one of the non-statutory consultees (Appendix 6) with whom it is intended to engage during the preparation of the Local Development Plan. Recommendation Note the response. No change.
Cymunedoli Cyf	CC13.8	It looks like the incorrect Impact Assessment has been attached to the Welsh link. But I am happy that I have had the opportunity to read the English version in its entirety.	Following being informed of this error, the correct version of the Assessment has been placed on the Council's website. It is noted that the Assessment is also available for inspection in the local public libraries along with council offices.

Appendix 1 – Comments on the Delivery Agreement

Name	Comment. Ref	8. Are there any changes to the process outlined in the Delivery Agreement that can be made to ensure that we gather and hear the views of the public and key stakeholders on matters relating to the Welsh language?	Council Response
			Recommendation Note the response. No change.
Mike Stevens	CC14.8	Please keep promoting the LDP to encourage people to get involved.	Recommendation Note the response. No change.

Question 9:

Name	Comment. Ref	9. The Council is required (under the Equality Act 2010) to consider the impact that a change in any policy or procedure (or the creation of a policy or procedure), will have on people with protected equality characteristics. Equality characteristics include, age; gender reassignment; sex; race (including ethnic or national origin, colour or nationality); disability; pregnancy and maternity; sexual orientation; religion or belief (including without belief); marriage and civil partnership. Furthermore, in accordance with the Socio-Economic Duty (2021) it is necessary for public bodies to consider how strategic decisions, including setting objectives and public service development, can reduce inequalities in terms of the outcome for socio-economically disadvantaged people, that is people living in less favourable social and economic circumstances than others in the same society (e.g. financial poverty, digital poverty, living far from services etc). In your opinion, is the Delivery Agreement likely to have an impact on • groups of people with equality characteristics • socio-economically disadvantaged people	Council Response
Heather Jones (Cyngor Cymuned Y Felinheli)	CC5.9	Don't currently foresee	Recommendation Note the response. No change.

Name	Comment. Ref	9. The Council is required (under the Equality Act 2010) to consider the impact that a change in any policy or procedure (or the creation of a policy or procedure), will have on people with protected equality characteristics. Equality characteristics include, age; gender reassignment; sex; race (including ethnic or national origin, colour or nationality); disability; pregnancy and maternity; sexual orientation; religion or belief (including without belief); marriage and civil partnership. Furthermore, in accordance with the Socio-Economic Duty (2021) it is necessary for public bodies to consider how strategic decisions, including setting objectives and public service development, can reduce inequalities in terms of the outcome for socio-economically disadvantaged people, that is people living in less favourable social and economic circumstances than others in the same society (e.g. financial poverty, digital poverty, living far from services etc). In your opinion, is the Delivery Agreement likely to have an impact on • groups of people with equality characteristics • socio-economically disadvantaged people	Council Response
Thomas Brooks	CC6.9	Yes Both	Recommendation Note the response. No change.

Appendix 1 – Comments on the Delivery Agreement

Chris Jones (Bwrdd Iechyd Prifysgol Betsi Cadwaladr)	CC7.9	Careful use of this consultation process should help to identify and mitigate the inequalities identified, and potentially others as well.	Careful consideration has been given to ensuring that the consultation process is inclusive. Any opportunities which may arise mitigate the inequalities identified will be addressed through the Equalities Impact Assessment. The Equalities Impact Assessment will be amended throughout the Plan preparation process. Recommendation Note the response. No change.
Walis George (Cymdeithas yr Iaith)	CC9.9	Probably	Recommendation Note the response. No change.
Cymunedoli Cyf	CC13.9	It could be questioned if 6 weeks of consultation is sufficient for individuals facing socio-economic disadvantage within their communities to respond. This means 6 weekends/12 days (as they work 5 days a week) to try and create a thoughtful package responding to your vision paper and strategic options. 8 weeks will be required.	The requirement to consult for a period of 6 weeks derives from the relevant regulations. To ensure that the timetable runs smoothly it is not intended to extend the public consultation period for the Vision and Strategic Options. Recommendation Note the response. No change.
Mike Stevens	CC14.9	Gwynedd has been stifled by draconian planning rules. We lack housing for our young families particularly in the Tywyn area. Stop referring to tourism as a problem its an opportunity we must enhance to bring revenue, jobs and prosperity. Negative people see problems. Positive people see opportunity.	Recommendation Note the response. No change.



Draft Delivery Agreement Gwynedd Local Development Plan

Contents

PART 1: Context	1
1.1 Introduction.....	1
1.2 The current position	4
1.3 Preparing the Delivery Agreement	4
1.4 Soundness Tests.....	4
1.5 Sustainability Appraisal Integrated Impact Assessments	4
1.6 Joint Working.....	5
1.7 Strategic Development Plan (SDP)	6
1.8 Supplementary Planning Guidance.....	7
PART 2: The resources and the timetable	9
2.1 The resources - staff.....	9
2.2 The resources – funding	9
2.3 The timetable.....	10
PART 3: Risk management	12
3.1 Making decisions	12
3.2 Factors that could influence the process.....	12
PART 4: Monitoring and Reviewing	13
4.1 Monitoring and reviewing against the DA.....	13
PART 5 – Scope of the Community Involvement Scheme (CIS).....	14
5.1 Introduction.....	14
5.2 Objectives and principles of the Community Involvement Scheme (CIS).....	14
5.3 From whom will we expect input?	16
5.4 When will the communities and key stakeholders participate in the process?.....	17
5.5 Methods of Engaging, Consulting and Participating	17
5.6 Links with the work of the Corporate Joint Committees and Joint Working 18	
5.7 Councillor Involvement	18
5.8 Involvement of Council officers	18
5.9 Document Availability and Feedback	19
5.10 Use of the Welsh language and other languages	19
5.11 What will be expected of the communities and key stakeholders?	19
5.12 The Register of Potential Sites.....	19
Appendix 1 – Delivery Agreement Diagram	21
Appendix 2 - Key stages in the process of preparing the LDP and participation opportunities	22
Appendix 3 - An Idea of Reports and Decisions at Key Stages in the Local Development Plan.....	42
Appendix 4 – Soundness Tests	43
Appendix 5 - Potential risks and response methods	45
Appendix 6 – List of Consultees	49

Draft Delivery Agreement – consultation version

Gwynedd's New Local Development Plan

This document is a draft version of the DA, which is the subject of a public consultation.

PART 1: Context

1.1 Introduction

1.1.1 The Planning and Compulsory Purchase Act 2004 makes it a requirement for local planning authorities in Wales to prepare a **Local Development Plan** (LDP) for their areas. This draft Delivery Agreement (DA) has been prepared by Cyngor Gwynedd as one of the steps in the preparation of the Local Development Plan (LDP). After its adoption, the Local Development Plan (LDP) will replace the Joint Local Development Plan (the current plan). Those areas of Gwynedd inside the Eryri National Park do not form part of the LDP area. The map on the page three shows the Local Development Plan area.

1.1.2 **Local Development Plans are at the heart of the planning system. The purpose of the Local Development Plan is to inform decisions on future development proposals and address the needs and opportunities of the area. The Local Development Plan must contribute to achieving sustainable development and be consistent with the relevant national and regional planning principles and policies. In essence, the purpose of a Local Development Plan is to provide guidance as to the types of developments suitable in different locations. The law makes it clear that decisions on planning applications should be made in accordance with the policies contained in the Local Development Plan unless there are other relevant planning considerations.**

1.1.3 A DA must be prepared before being able to proceed to the formal process of preparing the LDP. The final version of the DA is an important and legal part of the process of preparing the LDP and forms an official agreement between Cyngor Gwynedd and the Welsh Government. During the Examination in Public for the LDP, any deviations from the DA that were not agreed to by the Welsh Government will form an important test of the soundness of the LDP. The content of the DA and the manner in which the Council will implement it is therefore crucial to the preparation of a sound LDP.

1.1.4 In accordance with Local Development Plans Regulations 6, 8 and 9 and the Development Plans Manual, this draft DA has been divided into two sections:

- **The timetable** outlines specific dates for the steps of preparing the LDP until the Deposit Plan period with indicative dates until adoption.
- **The Community Involvement Scheme**, which will outline;
 - with whom the Council will make contact when preparing the LDP;

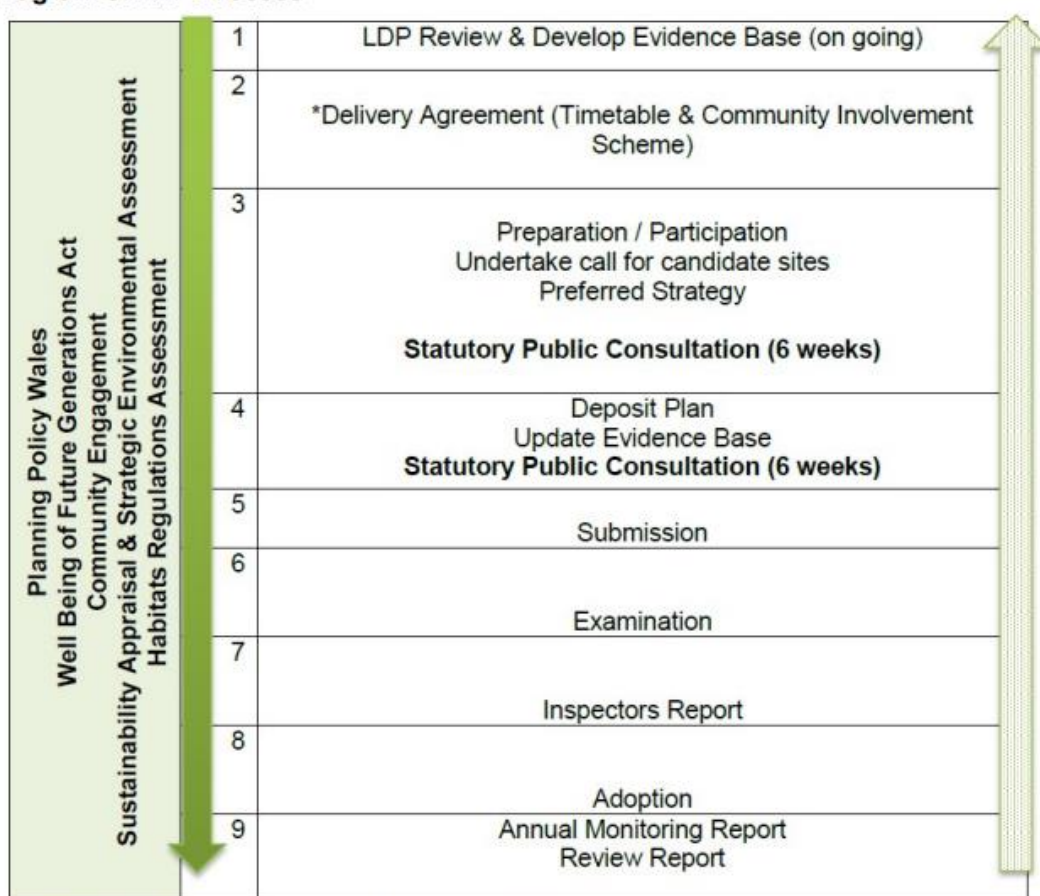
Draft Delivery Agreement – consultation version Gwynedd's New Local Development Plan

- how and when Council officers, Elected Members, the public, groups with an interest in the area and developers can contribute to the overall process;
- what happens to the representations?

More information regarding the Community Involvement Scheme is in Part 5 of the DA.

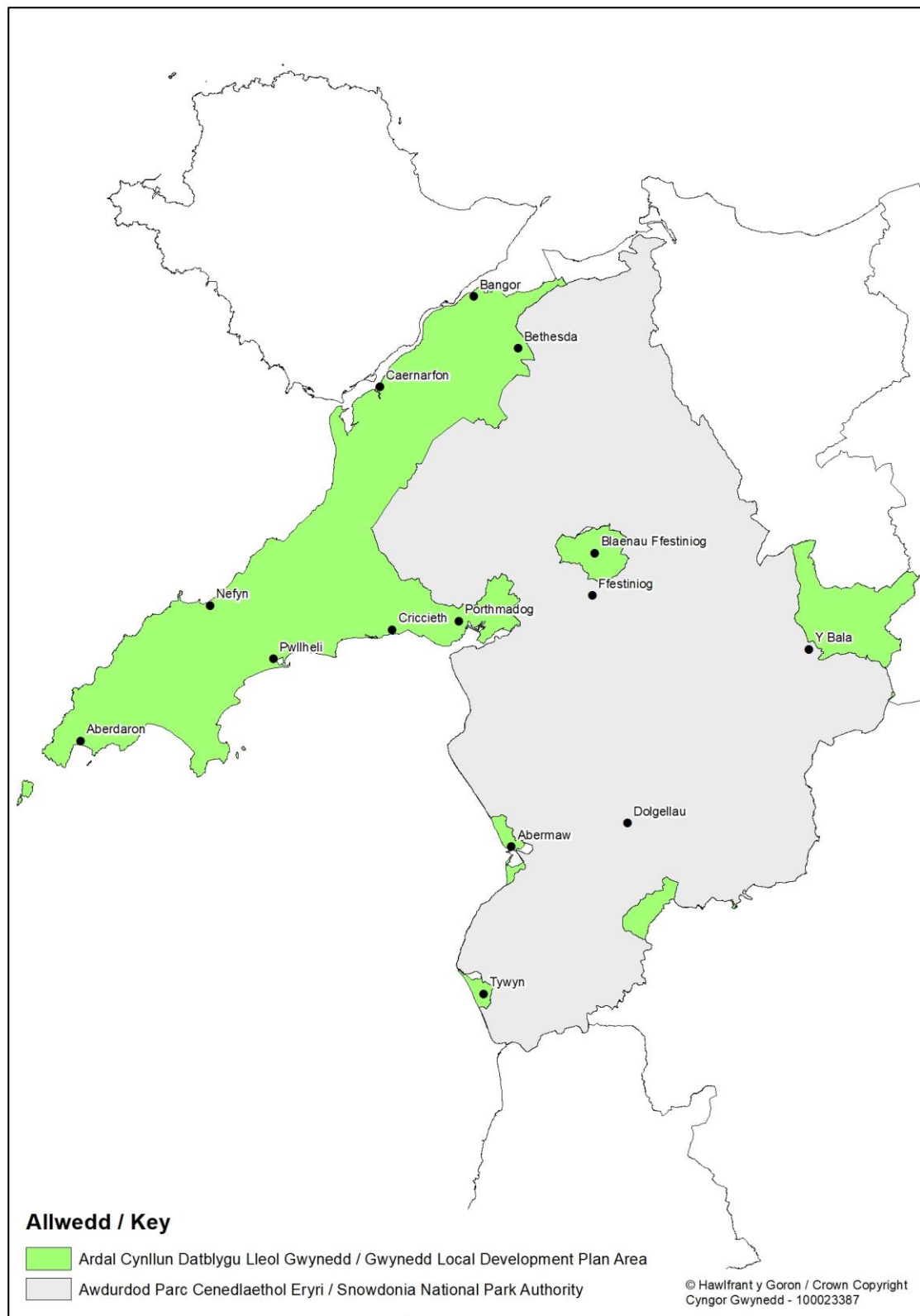
- 1.1.4 The DA outlines how the LDP will be assessed in accordance with the requirements of the Development Plans Manual (March 2020) by means of the Sustainability Appraisal and Integrated Sustainability Appraisal, including the Plan's Impact Assessment on the Welsh Language. Further information on matters that need to be considered when preparing the LDP is in the following diagram (Development Plans Manual March 2020).

Diagram 5: LDP Process



**See Chapter 8 for the Short Form Revision procedure*

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Map 1: LDP Area

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Gwynedd's New Local Development Plan

1.2 The current position

- 1.2.1 A Review Report was prepared following a review of the Joint LDP; it was concluded that a Full Revision of the Joint Local Development Plan needed to be undertaken. Since the Review Report was prepared, a decision has been made by Cyngor Gwynedd and the Isle of Anglesey County Council to bring the joint working arrangement to an end and to prepare Local Development Plans for the individual Local Planning Authorities.
- 1.2.2 Although it is a new LDP, the Plan will build on the work of the current LDP (where relevant) and if, for example, matters, objectives, core evidence, policies or proposals, remain relevant and current following a thorough reassessment, they can be continued in the new LDP.

1.3 Preparing the Delivery Agreement

- 1.3.1 This draft DA will be the subject of consultation with key stakeholders. Every representation received will be given due consideration and the DA will be amended where it is appropriate to do so. If the Council decides that it is satisfied with the DA, it will be submitted to the Welsh Government for its approval. Appendix 1 includes a flow-chart, showing the process that must be followed when preparing the DA. The Council will have to keep an eye on progress against the content and timetable of the DA. Should it be necessary to make amendments, then the same process will have to be repeated.

1.4 Soundness Tests

- 1.4.1 LDP must pass the 'soundness' test, i.e. the Council must ensure that the Plan has been prepared accurately and satisfies the three soundness tests that have been outlined in Development Plans Manual 3 (March 2020) as outlined below.
1. Is the plan suitable? (Is it clear that the LDP is consistent with other plans?)
 2. Is the plan appropriate? (Is the plan appropriate for the area in light of the evidence?)
 3. Will this Plan Deliver? (Is the plan appropriate for the area in light of the evidence?)
- 1.4.2 The Inspector will undertake a Public Examination that will decide whether or not the LDP is sound. More information about the soundness tests can be found in Appendix 4 of this DA.

1.5 Sustainability Appraisal Integrated Impact Assessments

Draft Delivery Agreement – consultation version

Gwynedd's New Local Development Plan

- 1.5.1 For the LDP, the Council must consider establishing the Sustainability Appraisal (SA) baseline, which includes the requirements of the Strategic Environmental Assessment (SEA) and reconsideration of the validity of the SA framework for the Joint Local Development Plan. If there are parts of the SA framework for the current LDP that are still relevant these will be updated for the new LDP.
- 1.5.2 Guidelines set out in the Development Plans Manual (March 2020) outline how an Integrated Sustainability Appraisal can be a rational way of assessing the impact of the Plan on specific matters, including the well-being of future generations act, health impacts, impact on the Welsh Language, Equality Impact. A scoping report will be prepared, and a consultation will be undertaken on the report early in the process of preparing the Plan to ensure that the framework used is appropriate.
- 1.5.3 Once the SA/ISA has been scoped, it will be used to assess policies and proposals that will be developed and submitted as part of the Plan. Reports will be prepared alongside the specific steps of the process of preparing the LDP, which will document the assessments on these steps. The assessments undertaken will be part of the consultations on the specific steps (outlined in Appendix 2) The SA/ISA will be an important part of undertaking assessments of potential sites that will be brought forward through the call for sites process.
- 1.5.4 A habitats regulations assessment (HRA) will also be carried out. The HRA will be prepared separately to the SA/ISA. The HRA will assist the preparation of the strategy, policies and land allocations of the LDP by noting their potential to affect nationally designated environmental habitats i.e. Special Areas of Conservation, Special Protection Areas and Ramsar sites. If there is a land use plan with the potential to substantially affect the site, a detailed Appropriate Assessment is needed to assess the impacts and to consider the suitability of options and mitigation measures.

1.6 Joint Working

- 1.6.1 The joint working agreement on planning policy matters included preparing a Joint Local Development Plan between Cyngor Gwynedd and the Isle of Anglesey County Council. The Joint working arrangement came to an end on 31 March 2023 following a decision by the Cyngor Gwynedd Cabinet and the Isle of Anglesey County Council's Executive Committee to establish new planning policy teams for both Councils. Although the joint working arrangements have ended and both Councils have decided to prepare separate Local Development Plans, when opportunities arise to prepare or commission pieces of work on a joint basis, the feasibility of this will be considered.
- 1.6.2 The steps taken by neighbouring Authorities in relation to their Local Development Plans have been noted in the table below:

Authority	Stage
Conwy County Borough Council	Deposit

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Powys County Council	Preferred Strategy
Eryri National Park Authority	Review Report
Isle of Anglesey County Council	Review Report
Denbighshire County Council	Preferred Strategy

- 1.6.3 When considering the steps taken by the above Authorities, the only Local Planning Authority (with the exception of Isle of Anglesey County Council) that is about to start preparing a Local Development Plan is the Eryri National Park Authority. It is not considered that collaborating with the National Park to prepare a Joint Local Development Plan is an option due to the difference in priorities, vision, and objectives of both plans. Eryri is a much more rural area with a much smaller population which also includes part of Conwy Borough Council and while also considering the statutory role of the National Park LPA and that any growth will be met by Gwynedd and Conwy's Local Development Plans.
- 1.6.4 Despite what is noted above, it is noted that it is intended to collaborate with neighbouring Local Planning Authorities when preparing the Plan, receiving their input in relation to the Plan's development and ensuring that the Plan is compatible with the Plans of those authorities. Furthermore, as appropriate, there may be opportunities to undertake studies/develop an evidence base on a joint basis. This already happens between Anglesey, Gwynedd and the National Park for example with a Review of Employment Land and Needs Assessment of Gypsies and Travellers.

1.7 Strategic Development Plan (SDP)

- 1.7.1 The planning system in Wales includes three tiers with Future Wales: The National Plan 2040 sitting at the top with Strategic Development Plans and Local Development Plans sitting underneath. The National Plan, is the national framework that determines a development direction in Wales until 2040 with a strategy addresses key national priorities through the planning system, including supporting and developing a vibrant economy, ensuring de-carbonisation and resilience in the climate, development of strong ecosystems and improving the health and well-being of our communities.
- 1.7.2 Cyngor Gwynedd is part of the North Wales region and a Strategic Development Plan is expected to be prepared for the region. However, no regional team is currently in place and no Delivery Agreement has yet been drawn up to prepare the SDP, therefore, there is no timetable to prepare and adopt the SDP yet. Work on preparing a new LDP must proceed to ensure that an up-to-date local policy framework is in place for the Gwynedd local planning area as soon as possible.
- 1.7.3 The Council acknowledges that there may be useful collaboration opportunities to explore and deliver when considering gathering evidence that could be useful for Strategic Development Plans and Local Development Plans.

Draft Delivery Agreement – consultation version

Gwynedd's New Local Development Plan

- 1.7.4 Local Development Plans must generally comply with the NDF and/or the Strategic Development Plan (when adopted) and this is one of the soundness tests that will be explored during the examination.

1.8 Supplementary Planning Guidance

- 1.8.1 The current Plan is supported by a series of Supplementary Planning Guidance that are listed below

Supplementary Planning Guidance – Housing Mix (October 2018)
Supplementary Planning Guidance – Open Spaces in New Housing Developments (March 2019)
Supplementary Planning Guidance – Local Market Housing (March 2019)
Supplementary Planning Guidance - Affordable Housing (April 2019)
Supplementary Planning Guidance – Replacement dwellings and conversions in the countryside (September 2019)
Supplementary Planning Guidance - Planning Obligations
Supplementary Planning Guidance - Maintaining and Creating Distinctive and Sustainable Communities
Supplementary Planning Guidance - Change of use of community facilities and services, employment sites and retail units
Supplementary Planning Guidance- Tourism Accommodation and Facilities
Supplementary Planning Guidance – Slate Landscapes of North West Wales

- 1.8.2 The purpose of the SPG is
- Assist applicants and their agents in preparing planning applications and in guiding them in discussions with officers before submitting planning applications,
 - assist officers to assess planning applications, and officers and councillors to make decisions about planning applications, and
 - help Planning Inspectors to make decisions on appeals. The general aim is to improve the quality of new developments and facilitate a consistent and transparent way of making decisions.
- 1.8.3 As part of preparing the LDP, the current guidance will need to be reviewed to ensure that they are still valid and support the policies being prepared as part of the LDP. Consideration will also need to be given to the need to prepare any new SPG to support LDP policies. If new SPG will need to be prepared,

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this will be noted as the process of preparing the Plan proceeds. Any new SPG will be the subject of a consultation with relevant stakeholders.



Draft Delivery Agreement – consultation version

Gwynedd's New Local Development Plan

PART 2: The resources and the timetable

2. The timetable for preparing the various steps in the process of preparing the LDP, how the process is managed and information regarding the resources required for its preparation is one key element of the Delivery Agreement (DA).

2.1 The resources - staff

- 2.1.1 It is a requirement for the Council to commit staff and funding resources for undertaking the various steps in the process of preparing the LDP.
- 2.1.2 As the Planning Policy Team has already been through a process of preparing and adopting the current LDP, they have extensive knowledge and experience. This experience is valuable and means that there is an understanding of what is needed when preparing a LDP. In addition, as the current LDP includes a detailed evidence base, this means that it is possible to review current policies and update the current evidence base, which may mean the workload is less than what was required when the first LDP was produced. The table below shows staff resources.

<u>Officer Title</u>	<u>% of officer time allocated for the LDP</u>
Assistant Head	10
Planning Policy Manager x1	60
Team Leaders x2	70
Senior Planning Officers x2	85
Planning Officer x1	90
Support Officer x1	90

- 2.1.3 Officers from other Services of the Council will also be a part of various aspects of preparing the LDP, as required. This support will include assistance when forming policies, sustainability assessment, habitat regulations assessments and expert advice to respond to the observations received. The Council's Communication and Engagement Officer/Communication Team will assist in the participation and consultation steps as required.
- 2.1.4 When required, external consultants will be commissioned to undertake technical/specialist surveys to add to the Planning Policy Services capacity, or to provide advice on specific technical/specialist matters. Funding resources are available for this work.

2.2 The resources – funding

- 2.2.1 Based on past experiences of preparing development plans and the experiences of other authorities, the Council has allocated a sum of money to

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Gwynedd's New Local Development Plan

ensure that the LDP moves forward through the process in accordance with the Delivery Agreement and at least until the end of the Examination in Public. Bids will be made for additional funding if required by means of the usual internal bidding processes of the Council.

2.3 The timetable

2.3.1 The table below outlines the key steps in the process of preparing the LDP and it notes the proposed draft timetable for the completion of these steps. The timetable is based on resources referred to above. A more detailed timetable can be found in Appendix 2.

2.3.2 The Timetable reflects the guidance in the Development Plans Manual (March 2020). It has been divided into two parts with definitive stages and indicative stages.

Stage Number	Stage	Timetable	Key Consultation Periods
Definitive			
1	Delivery Agreement - Preparation - Consult with key stakeholders - Submission	September 2023 - March 2024	Public Consultation October October-November 2023 Approval by the Council March 2024 Submit to the Welsh Government March 2024
2	Pre-deposit - prepare, content and consultation - Vision Paper with strategic options - Call for sites Need Specific Background Papers	March 2024 - August 2025	Call for sites March/April 2024 for at least 6 weeks
3	Pre-deposit Consultation Preferred Strategy Impact Assessments SA/SEA and HRA	March 2024 - August 2025	March 2025 to April 2025

Draft Delivery Agreement – consultation version Gwynedd's New Local Development Plan

4	Deposit Plan	September 2025 - August 2026	Public Consultation December 2025/January 2026
	Indicative		
5	Submission	September 2026	n/a
6	Examination	11 months of submission (target)	A further consultation may be undertaken following the examination
7	Inspector's Report	August 2027	
8	Adoption	September/October 2027 (must be adopted within 8 weeks of receiving the report)	n/a
9	Monitoring and Review	Ongoing post adoption	Annual Monitoring Reports due October each year and the Plan Review no later than 4 years from adoption date

Draft Delivery Agreement – consultation version Gwynedd's New Local Development Plan

PART 3: Risk management

3.1 Making decisions

- 3.1.1 A Planning Policy Working Group has been established, which have the responsibility for preparing and shaping the LDP. The Working Group is formed by 15 members representing the Council's political balance.
- 3.1.2 It will be the responsibility of Cyngor Gwynedd Cabinet to make decisions on the content of the documents associated with the preparation of the LDP e.g. Delivery Agreement and the pre-deposit documents. Cabinet decisions will be made based on having regard to all available evidence, together with consideration of the input/comments of the Working Group. Further there is a statutory responsibility on the Full Council to make some of the decisions related to the Plan. The table in Appendix 3 identifies the role of the different committees in the process.

3.2 Factors that could influence the process

- 3.2.1 The Council is of the opinion that the timetable that has been identified is realistic and can be achieved. Every effort will be made to keep to that timetable. However, some matters have been identified where there is a risk that they could lead to a departure from the timetable noted in this DA. More details regarding the risks and the steps that are intended to be taken to meet/mitigate those risks are in Appendix 5.

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Gwynedd's New Local Development Plan

PART 4: Monitoring and Reviewing

4.1 Monitoring and reviewing against the DA

4.1.1 The Cabinet will monitor and review the progress made against the DA throughout the work of preparing the LDP in order to ensure that the steps of the DA are being achieved in accordance with the proposed timetable. The following are examples where there could be a need to review and amend the DA:

- If the process is delayed substantially in terms of the timetable (3 months)
- If any substantial changes are required to the Community Involvement Scheme
- If there are any substantial changes in the resources available to the Council
- If any new legislation, regulations or guidance from the UK or the Welsh Government make it a requirement that new procedures or tasks have to be implemented
- If there are any other changes that have not been foreseen that have a material effect on the presentation of the plan in accordance with the DA.

4.1.2 If the Council identifies that there is a need to review the DA, there must be a re-discussion with the specific consultation bodies and agreement must be sought from the Welsh Government in accordance with the LDP Regulations.

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Gwynedd's New Local Development Plan

PART 5 – Scope of the Community Involvement Scheme (CIS)

5.1 Introduction

- 5.1.1 The Regulations of the LDP require that Councils work in partnership with stakeholders and communities early on in the process of preparing the LDP. The Well-being Act 2015 has introduced seven well-being aims to help ensure that public bodies work toward the same vision, of a sustainable Wales and to determine the 'Five Ways of Working' public bodies need to show that they have delivered when undertaking their sustainable development duty. Giving consideration to the five ways of working below is an important part of the Local Development Plans system.

Long term	- Taking account of how what we do now may affect communities and services in the future
Prevention	- Acting to prevent problems occurring or getting worse
Integration	- Considering how the well-being objectives contribute to each of the well-being goals, affect other objectives, or those of other public bodies
Collaboration	- Working with others to meet the well-being objective
Involvement	- Involving people in achieving the well-being goals and ensuring that those people reflect the diversity of local communities

- 5.1.2 One of the key objectives of the Development Plans system is that Plans should be **based on including communities early, effectively and meaningfully in order to understand and consider a wide range of viewpoints**. (Development Plans Manual March 2020). The DA notes how and when communities will be included in the LDP process to give communities an opportunity to help prepare and influence the contents effectively.
- 5.1.3 The Community Involvement Scheme sets out what the Council intends to do and where time allows and, if relevant, the Council can provide additional engagement periods.

5.2 Objectives and principles of the Community Involvement Scheme (CIS)

- 5.2.1 The purpose of public participation is to ensure that a wide range of communities, individuals who have an interest and specific consultation bodies participate in the decision-making process regarding the contents of

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Gwynedd's New Local Development Plan

the LDP. This is done by encouraging discussion and sharing relevant information. The Council is of the opinion that involving communities early in the LDP process is crucial to ensure local ownership and the legitimacy of policies that will determine the development of the area in future. This method should reduce the time taken to adopt the plan by reducing the number of objections to policies in the deposit LDP and, therefore, reduce the time spent on the later stages of the process of preparing the plan. The process of reaching consensus is assisted by establishing and sharing a common base of information for key matters from the very beginning of the process. This method of working is reinforced when considering guidance in the Development Plans Manual March 2020. It sets out the importance of consulting early in the process of preparing the Plan to ensure an understanding and consider *a wide range of viewpoints, with the aim of building a broad consensus on the spatial strategy, policies and proposals.*

5.2.2 It will be important for those interested in the plan to participate in every step of the process, including the initial steps where there are opportunities to help shape and influence the plan. The Council considers that this CIS outlines the circumstances to make this possible.

5.2.3 The CIS will provide an understanding of the following:

- The periods when the communities can participate in the process and to what extent;
- The range of possible methods and techniques used to ensure that communities can participate in the process.

5.2.4 The table below sets out the principles of Community Involvement

Can access information	So that communities and stakeholders can make the correct choices and understand the context of the LDP, appropriate and timely information will be provided, in an easily accessible and understandable form.
Early participation	Ensure that communities and stakeholders have every opportunity to get involved and participate from the very first stage of the process of preparing the LDP. Contributions will be encouraged during the times of preparing the LDP when ideas can best influence the process.
Relevant information	The available information will encourage involvement and participation throughout the process and it will be appropriate and relevant to each specific group, based on a clear understanding and the needs and experience of the communities and stakeholders

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Regular feedback	Provide regular feedback so the communities and stakeholders can see how ideas develop or be informed of why ideas cannot be developed further.
Transparency	Be clear from the very beginning regarding who will take part and when, including their role during each step.
Sharing information	Ensure that contributions from communities are fed into work undertaken on plans and other key strategies.

5.3 From whom will we expect input?

5.3.1 We will be concentrating on getting input from the following:

The Public, namely individual members who live, work or stay in the LDP area. These hard to reach groups can include, for instance, young people, older people, Gypsies and Travellers, disabled individuals and individuals who are suffering due to economic and social deprivation. Current partnerships will have a role to play to reach some of these. Some of the general consultation bodies referred to below will also have a role to play.

Businesses, landowners, developers and their agents: Some general consultation bodies will have a role to play to reach some in the business community, landowners and developers. Landowners and prospective developers and their agents will have an opportunity to submit ideas/proposals for land that could be available to be developed early on in the process by registering information on the **Register of Potential Sites** (see para 5.12).

General consultation bodies: namely, groups and organisations which have a specific interest in the area e.g. bodies that represent the interests of different race or ethnic groups; bodies that represent the interests of those running their businesses in the LDP area; bodies that represent the interests of the Welsh culture in the area. A list of these can be found in Appendix 6.

Specific consultation bodies, namely those that the Council has to consult with e.g. the Welsh Government, Natural Resources Wales, Cadw, Community and Town/City Councils and nearby authorities. A list of these can be found in Appendix 6

Contacts Database: When preparing the current Joint Local Development Plan, a contacts database was developed, which included a large number of individuals and organisations that had expressed an interest in the process of preparing the Plan or had participated in consultations and the specific steps of preparing the Joint LDP. This database has been transferred as a contacts database for the Gwynedd LDP and it is deemed a comprehensive database.

Draft Delivery Agreement – consultation version

Gwynedd's New Local Development Plan

However, anyone has the right to request to be added to the contacts database at any time or to be removed from the database. Anyone who submits observations during any of the consultation periods will be added to the contacts database.

5.4 When will the communities and key stakeholders participate in the process?

- 5.4.1 The timetable for the preparation of the LDP can be seen in appendix 2. Information can also be found on the opportunities that will be available to the communities and key stakeholders to take part in the process.

Sustainability Assessment/Strategic Environmental Assessment (SA/SEA)

- 5.4.2 Every stage of the LDP process will have to be the subject of a SA. SA is a technical process but interested parties are given an opportunity to submit observations. Work that will have to be completed early on during this process will be to revisit the evidence base that supports the SA, which prepares information about the linguistic, social, economic and environmental characteristics of the area. This evidence base and other information will form a part of the Scoping Report. This Report will be the subject of a formal public consultation.

5.5 Methods of Engaging, Consulting and Participating

- 5.5.1 A number of methods are used to facilitate the involvement of stakeholders and communities throughout the process of preparing the LDP.

- Council Website - a specific part of the website will be allocated to share news about the LDP (www.gwynedd.llyw.cymru)
- 'Gair o Gyngor' newsletter, the intranet, staff e-bulletins
- Siop Gwynedd Caernarfon, Dolgellau and Pwllheli, the county's public libraries
- Use of events/meetings that already exist e.g. youth groups
- Direct contact (through letter / e-mail)
- Awareness raising sessions for members and updates on members' intranet
- Messages on the Council website and social media
- Hold workshops / open/virtual meetings
- Articles in 'Newyddion Gwynedd'

- 5.5.2 In addition to the above, the Council is committed to using networks and partnerships that already exist. We will also use groups that have already been established by the Council to receive input on the process of preparing the LDP.

Draft Delivery Agreement – consultation version

Gwynedd's New Local Development Plan

5.6 Links with the work of the Corporate Joint Committees and Joint Working

- 5.6.1 When preparing the LDP, it is important that the Council is completely aware of proposals and developments in neighbouring authorities and beyond that could affect the LDP area. It is very likely that work will commence on the Strategic Development Plan during the period of preparing the LDP. It will be important that the Council is aware of this work and ensures that it gives an input into this process.
- 5.6.2 A close working relationship will be nurtured with Eryri National Park Authority and Conwy, Ceredigion, Denbighshire, Flintshire, Powys, Wrexham and Isle of Anglesey County Councils through regular programmes of meetings.

5.7 Councillor Involvement

- 5.7.1 All Councillors will receive information at key stages throughout the process of preparing the LDP, for example: a discussion on the vision; strategic aims and objectives of the LDP; consideration of the preferred strategy - namely the first important steps; and later when discussions are held on specific issues in terms of sites and settlements. Councillors will also have an important role as a result of their local knowledge to operate as local 'promoters', to raise awareness in the communities and, therefore, facilitate the process of drawing up the LDP. Councillors' contributions will be guided by the Members' Code of Conduct to prevent any influencing on the role of Councillors in making recommendations and decisions at the relevant committees.
- 5.7.2 At key stages throughout the preparation period of the LDP, reports will be submitted to the Communities Scrutiny Committee and to the Full Council (as required see Appendix 2).

5.8 Involvement of Council officers

- 5.8.1 Consulting with relevant officers within the Council will be crucial throughout the preparatory stage of the LDP. This consultation in addition to the meetings of other current groups on officer level e.g. Water and Flooding Cross-departmental Operational Meeting, and other groups that deal with topical matters e.g. housing, economy, education, the Welsh Language, climate change and matters relating to specific areas to submit and discuss LDP matters. Relevant officers may also be invited to submit evidence to the LDP working group and to discuss relevant matters with working group members as required. Consideration is also being given to establishing an internal Group of Council Officers as well as Sub-groups to deal with specific matters when preparing the LDP to ensure cross-departmental input to the process of drawing up the LDP.

Draft Delivery Agreement – consultation version

Gwynedd's New Local Development Plan

5.9 Document Availability and Feedback

5.9.1 The principal consultation documents will be widely available in order to encourage and ensure effective engagement throughout the LDP process. The documents will be published electronically on the Council website (www.gwynedd.llyw.cymru) and via e-mail. For those who are not in the contacts database paper copies will also be available in the following places.

- Siop Gwynedd in Caernarfon, Pwllheli and Dolgellau
- Public libraries in Gwynedd

5.9.2 Reports and minutes of any relevant public meetings, where matters relating to the LDP will be reported, will be published electronically on the Council website (www.gwynedd.llyw.cymru)

5.9.3 Full consideration will be given to the needs of disabled individuals in order to ensure that they have access to information. If a request is received, an effort will be made to provide bold print copies and/or audio versions of documents.

5.10 Use of the Welsh language and other languages

5.10.1 Preparing the LDP, the liaising and consulting will conform to the Welsh Language policy of the Council. All public documents will be published bilingually.

5.11 What will be expected of the communities and key stakeholders?

5.11.1 So as to ensure that everyone plays a full part throughout the LDP process it is important for them to consider the following:

- That they respond to correspondence within an appropriate time limit, while following any specific procedure
- Understand that the LDP does not deal with everything and raise matters that the LDP can legally deal with
- Commit to the process by being present, contributing and assisting in creating a consensus
- Identify any gaps in the information provided / in the evidence base
- Identify and submit appropriate details about proposed sites promptly
- Follow guidelines and relevant procedures
- Share/provide information by demand
- Understand that the Report of the Inspector is binding and that it is not possible to appeal against the recommendations of the Inspector
- Provide contact details so that the Council can share information and share responses

5.12 The Register of Potential Sites

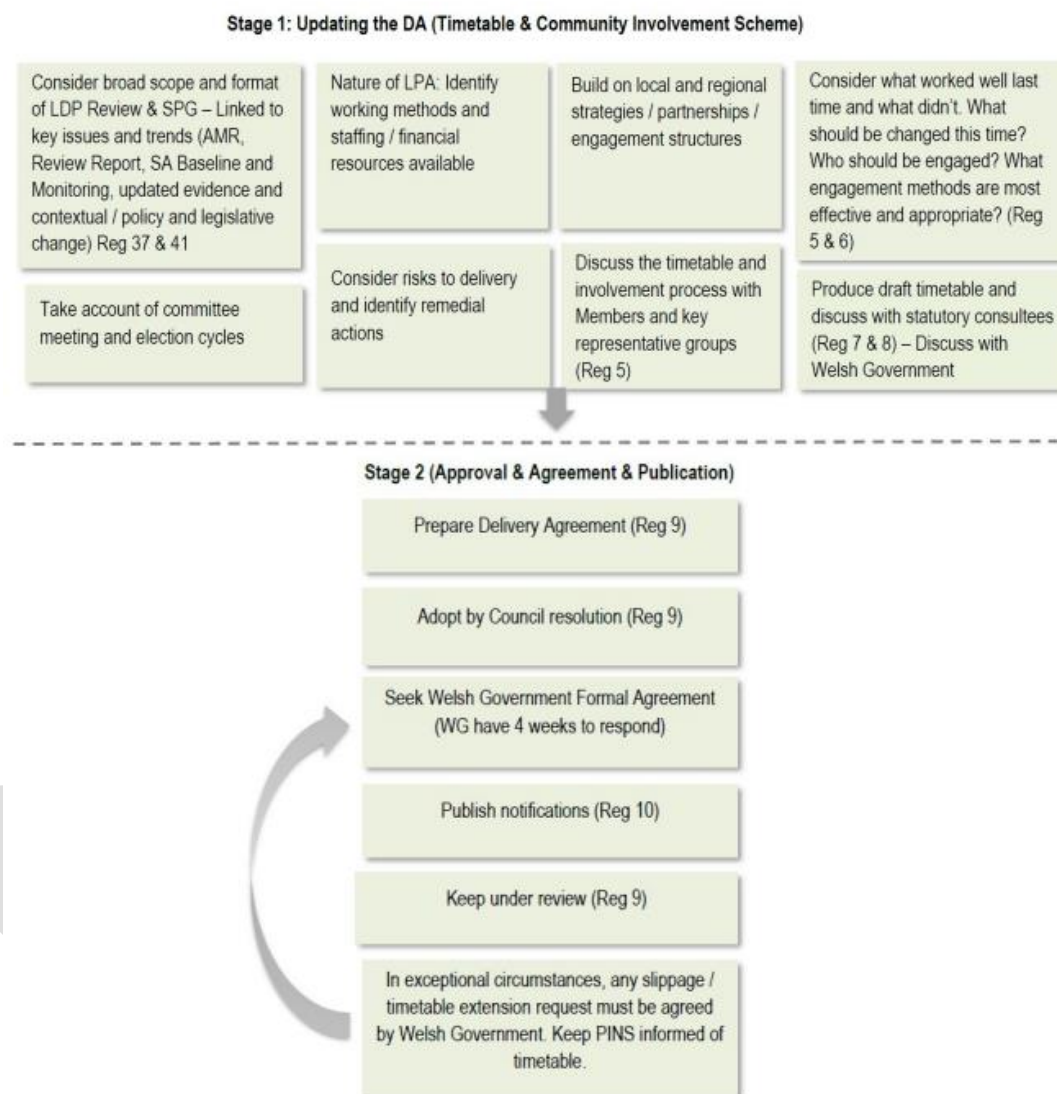
Draft Delivery Agreement – consultation version Gwynedd's New Local Development Plan

- 5.12.1 A Register of Potential Sites will be created early in the process of preparing the LDP. Proposals are invited for Potential sites to be included in the Plan (e.g. for housing, business, shops) on the Council website (www.gwynedd.llyw.cymru) and by contacting the individuals are on the contacts Database. Anyone can propose a site, but the proposals are expected to be supported by evidence showing that the site is suitable for development and that it can be delivered during the plan period in accordance with guidelines that have been outlined in section 3 of the [Development Plans Manual](#). Guidance will be given regarding the type of information needed on the Council website.
- 5.12.2 The Register will be available for public viewing (on the website). Following consideration of the sites, an assessment will be published. This Register will fulfil an important function when identifying sites to be designated for development and when discussing other options. The call for sites stage will open for at least 6 weeks.

Appendix 1 – Delivery Agreement Gwynedd Local Development Plan

Appendix 1 – Delivery Agreement Diagram

Diagram 7: The Delivery Agreement Process



Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

Appendix 2 - Key stages in the process of preparing the LDP and participation opportunities

Stage 1 The Delivery Agreement (Regulation 9) When: September 2023 - March 2024

Which stage and when?	Purpose	Participants	How? Participation/consultation method	Reporting method	Resources (in addition to usual staffing costs)	SA/SEA/ISA
Drafting the Delivery Agreement (DA) June - September 2023	Prepare a document that is a public statement of the LDP preparation timetable and how and when stakeholders and the community can contribute.	Council Departments Elected members	Direct contact with individual officers Planning Policy Working Group. Communities Scrutiny Committee Cyngor Gwynedd Cabinet	Consider the observations and make appropriate amendments Publish the minutes of the Scrutiny Committee Publish the Minutes of the Cabinet	Printing and translation costs	Internal work to reconsider the current SA framework and baseline information for the LDP. Consideration will be given to prepare an Integrated Evaluation of Sustainability, which will consider sustainability, environmental, health, well-being and equality matters. The
Consult on the draft DA (6 weeks) October - November 2023)	Inform stakeholders and communities that the Council is going to prepare a LDP. Receive opinions	Welsh Government Specific consultation bodies General	Letter and copy of the draft DA to the Welsh Government and other specific consultation bodies Letter to general consultation bodies and other stakeholders	Consider the observations and make appropriate amendments Include contact details of those who made representations on the	Printing and postage costs Translation costs External	

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

Which stage and when?	Purpose	Participants	How? Participation/consultation method	Reporting method	Resources (in addition to usual staffing costs)	SA/SEA/ISA
	on the contents of the DA Identify the relevant stakeholders	consultation bodies Other relevant stakeholders (including the public)	Publish the document on the Council website www.gwynedd.llyw.cymru Copies in Siop Gwynedd in Caernarfon, Pwllheli and Dolgellau and public libraries Provide an observations form which will include relevant questions An opportunity to submit observations on-line	Council database regarding the LDP to be used again A report summarising the observations and introducing the amended draft DA to the Planning Policy Working Group, the Cabinet, Full Council in order to reach a decision to approve the amended draft DA as a document to be submitted to the Welsh Government.	consultation software	Welsh Language will receive full consideration separately.

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

Which stage and when?	Purpose	Participants	How? Participation/consultation method	Reporting method back	Resources (in addition to usual staffing costs)	SA/SEA/ISA
Send Amended Draft DA to the Welsh Government (March 2024)	Inform the Welsh Government that the Council has approved the amended draft DA Request the agreement of the Welsh Government	Welsh Government	Letter and copy of the draft DA		Printing and postage costs	
Publish final DA approved by the Welsh Government (March 2024)	Inform about the approved DA and where it can be viewed	Welsh Government Specific consultation bodies General consultation bodies Other relevant stakeholders (including the public)	Direct mail-shot (letter/e-mail) for those who are not in the database Publish the document on the Council website (www.gwynedd.llyw.cymru) Copies in Siop Gwynedd in Caernarfon, Pwllheli and Dolgellau and public libraries	Letter to elected Members informing them that the Welsh Government has approved the DA	Printing costs	

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

Stage 2: Pre-deposit Participation (Regulation 14) When: March 2024 - August 2025

Which stage and when?	Purpose	Participants	How? Participation/consultation method	Reporting method	Resources (in addition to usual staffing costs)	SA/SEA/ISA
Review and update the evidence base. Call for potential sites Spring 2024 for at least 6 weeks	In order to understand the context, review and expand the quantitative and qualitative information, and identify the matters and objectives that the LDP can address.	Council Departments/SerVICES (e.g. Housing, Economy, Education) Elected members Specific consultation bodies General consultation bodies Other relevant stakeholders (including landowners)	Direct contact with individual officers and established officers forums Public/virtual seminars/workshops Planning Policy Working Group Direct contact with specific consultation bodies and various general consultation bodies Publish draft topic papers and invite suggestions Key Stakeholders Group Publish assessment methodology of potential sites Publish forms to propose	Publish subject papers on the website and store in the evidence base library Direct contact with specific consultation bodies and various general consultation bodies to inform about published topic papers Publish proposals of potential sites on the Council website	Hold seminars and meetings Printing costs Costs of commissioning consultants work when required	Develop the SA Scoping Report (December 2023 - November 2024) Habitats Regulations Assessment (HRA) Publish SA Scoping Report for public consultation (6 week period)

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

			potential sites, publicise this stage and invite proposals Publish register of potential sites, and invite observations			
Review and prepare the vision of the LDP Note the main objectives of the LDP.	Agree on a clear vision, with spatial relevance, of what kind of place is aimed to be achieved in the LDP area Agree on the main objectives of the LDP	Council Departments/Ser vices The public Key Stakeholders Group of the LDP Elected members Current forums that represent key groups in the local population Specific consultation bodies General consultation bodies	Direct contact with individual officers and established officers forums Structured discussions/working groups Seminars for Elected Members Virtual sessions Planning Policy Working Group Cabinet	Publish Cabinet minutes on the Council website Publish the vision and objectives on the Council website	Administrative costs	
Identify and	Identify options			Publish the minutes	Administrative	

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

test strategic options and strategy April 2024 August 2025)	and decide on their strengths and weaknesses			of the Cabinet Publish participation report on the Council website	costs	
Publish SA Scoping Report for public consultation (6 week period)	Seek stakeholder opinion regarding scope of the SA/SEA and objectives	The Public Specific consultation bodies General consultation bodies Council Departments/Ser vices	Direct mail-shot (letters/e-mail) to raise awareness Publish the document on the Council website (www.gwynedd.llyw.cymru) Copies in Siop Gwynedd in Caernarfon, Pwllheli and Dolgellau and public libraries	Publish received observations on public website Consider the observations and make appropriate amendments (if applicable)	Printing costs Administrative costs Consultants costs	
Prepare Preferred Strategy draft document March 2024 - August 2025 Receive the Council's agreement to	Establish a strategic direction that will achieve the vision. Confirm the general vision and objectives of the Council,	Council Departments/Ser vices (e.g. Housing, Economy, Education) Welsh Government	Structured discussions/working groups Planning Policy Working Group The Cabinet The Full Council	Publish the minutes of relevant Committees	Administrative costs	

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

go out to public consultation	the strategic spatial options considered, the spatial strategy chosen and the implications to developments e.g. the strategic sites. Demonstrate, by applying the relevant soundness tests, that the process of choosing a strategy is robust. Identify consistent sites/that derive from the chosen strategy Publish the evidence base that supports the Preferred Strategy	Key Stakeholders Group of the LDP Elected members				

**Appendix 2 – Delivery Agreement
Gwynedd Local Development Plan**

	Set out which policies will be retained from the Current Plan (if any)					

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

Stage 3: Public Consultation on the Preferred Strategy and respond to observations (Regulations 15 & 16) When: March 2024 - August 2025

Which stage and when?	Purpose	Participants	How? Participation/consultation method	Reporting back method	Resources (in addition to usual staffing costs)	<u>SA/SEA/ISA</u>
Public consultation on the Preferred Strategy (6 weeks) March 2025 to April 2025	Inform of the Preferred Strategy Proposals Document Discuss and invite ideas regarding the documents for a statutory period of 6 weeks	Welsh Government Specific consultation bodies General consultation bodies The public and any other interested parties	Direct mail-shot (letters/e-mails) to everyone on the LDP database, general consultation bodies Publish the document on the Councils website (www.gwynedd.llyw.cymru/cdill) Copies in Siop Gwynedd in Caernarfon, Pwllheli and Dolgellau and public libraries The standard form for observations	Acknowledge receipt of observations through letter/e-mail Contact those who have responded to inform them about where to find information about the response to the consultation	Printing and translation costs Postage costs Preparing and holding exhibitions and meetings costs Administrative Costs External consultation software	Consult on Sustainability Appraisal/Strategic Environmental Assessment/ISA proposals and alternative choices alongside the Preferred Strategy

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

			available specified places in public			
Sustainability Appraisal Report (draft)	Demonstrate how the preferred choices were reached in view of the SA/SEA Invite observations on the SA/SEA ISA	As above	As above		Printing and translation costs Postage costs	
Consider the observations received (May 2025 - September 2025)	Give the Council an opportunity to consider every observation appropriately Further review and develop the evidence base	Council Departments/Services Key Stakeholders Group of the LDP Elected members Relevant stakeholders	Direct contact with individual and established officers forums Structured discussions/working groups Planning Policy Working Group The Cabinet	Planning Policy Working Group The Cabinet Publish updated or new (where appropriate) topic papers on the website and store in the evidence base library in the Council Offices, Caernarfon	Printing costs Preparation and printing costs of general summary of the conclusions of the consultation and postage costs	

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

				Prepare an Initial Consultation Report and upload it on the Council website		
Prepare Deposit LDP and associated documents September 2025 - August 2026	Create completed version of the LDP and publish Create final Consultation Report and publish Create or update final Supplementary Planning Guidance and publish (if relevant)	Council Departments/Services (e.g. Housing, Economy, Education) Elected members Planning Policy Working Group	Direct contact with individual officers and established officers forums Structured discussions/working groups The Scrutiny Committee Planning Policy Working Group The Cabinet	Publish Scrutiny Committee and Cabinet minutes on the Council website	Administrative costs	

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

Stage 4: Public Consultation on the Deposit Plan and consider the representations (Regulations 17, 18 & 19) When: September 2025 - August 2026

Which stage and when?	Purpose	Participants	How? Participation/consultation method	Reporting back method	Resources (in addition to usual staffing costs)	<u>SA/SEA/ISA</u>
A public consultation on the Deposit LDP (6 weeks) December 2025-January 2026	Give all interested parties an opportunity to view the LDP and submit observations	Welsh Government Specific consultation bodies General consultation bodies Key Stakeholders Group of the LDP The public and any other interested parties	Direct mail-shot (letters/e-mails) to everyone on the LDP database, and the general consultation bodies Letter and copy of the Deposit LDP and relevant documents along with a list of other documents to the Welsh Government and specific consultation bodies Publish Deposit LDP and each relevant document, including a straightforward summary of the Pre-Deposit Plan,	Acknowledge the receipt of observations through letter/e-mail Publish a copy of each observation received in the relevant public places Give details of the observations received on the Council website, noting where hard copies can be viewed.	Printing and postage costs Advertising costs Administrative Costs	SA / SEA (ISA) documents that were consulted upon alongside the Deposit LDP for the same period

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

			including key information and the standard form for observations on the Council website Copies in Siop Gwynedd in Caernarfon, Pwllheli and Dolgellau and public libraries The standard form for observations available in specified public places Various techniques to raise awareness, ensure understanding and elicit discussion (e.g. Awareness raising sessions for elected members, Virtual sessions, Information on the Council website and social media)			

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

Consider the observations received February 2026-September 2026	Give the Council an opportunity to consider every observation appropriately Further review and develop the evidence base	Council Departments/Services (e.g. Housing, Economy, Education)	Direct contact with individual officers and established officers forums Structured discussions/working groups Planning Policy Working Group The Cabinet	Publish Cabinet minutes on the Council website Publish consultation report Inform those who made representations that a consultation report is available to view. Publish updated or new (where appropriate) topic papers on the website and store in the evidence base library in the Council Offices, Caernarfon.	<i>Printing and postage costs</i> <i>Administrative Costs</i>	

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

Stage 5: Submit the LDP to the Welsh Government for Examination (Regulation 22) When: September 2026 (indicative)

Which stage and when?	Purpose	Participants	How? Participation/con sultation method	Reporting back method	Resources (in addition to usual staffing costs)	<u>SA/SEA/ISA</u>
Submit the LDP and full series of associated documents (including the SA Report) to the Welsh Government Present the following documents: Deposit Plan • SA SEA ISA, HRA • Community Involvement Scheme Delivery Agreement / • Consultation report • Review report • Register of proposal sites • Copy of the observations made appropriately in	Inform all stakeholders that the Council has submitted the LDP to the Welsh Government	Those who made representations and all other stakeholders who have declared that they wish to be informed of the development of the LDP	Publish a statement on the Council website regarding submitting the LDP for Examination. Direct mail-shot (letters/e-mails) to those who made representations and other stakeholders who have declared that they wish to be informed of the development of the LDP Publish a copy of all the documents submitted to the Welsh Government on the Council website and in	Not relevant	Printing costs Administrative Costs	The SA/SEA (ISA) report submitted showing how the evaluation of processes has informed the Plan's contents.

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

the deposit stage • Associated documents / evidence			relevant public places			

Stage 6: The Public Examination (Regulation 23) When: September 2026 - August 2027 (indicative)

Which stage and when?	Purpose	Participants	How? Participation/consultation method	Reporting back method	Resources (in addition to usual staffing costs)	<u>SA/SEA/ISA</u>
Publish a notice about the Public Examination (at least 6 weeks before commencing the Examination)	Inform stakeholders that the Examination is taking place	All those who made representations and anyone else who has declared an interest in the Examination/the LDP process.	Letter/e-mail to those who made representations and other relevant stakeholders providing details the Examination. Publish details about the Examination on the Council website.	The Programme Officer will update the website with all information relating to the examination.	Postage costs Advertising costs Printing costs	
Pre-examination Meeting	To give the Inspector an opportunity to explain the	As above	As above	As above	Postage costs Costs of holding the meeting (e.g.	

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

	Examination arrangements and to request additional information (if this is required)				simultaneous translation, fees, Programme Officer)	
Examination of the LDP	Receive independent opinions about the soundness of the LDP and the observations received.	All those who made representations who has not withdrawn their objection.	Discussion sessions around the table. Hearings. Formal hearings (The Inspector will determine the best method to submit oral evidence) Formal written statements	Inspector's Report	Costs of holding the meeting (e.g. simultaneous translation, fees, Programme Officer, administering the Examination) Administrative costs	
Prepare and consult on the Matters Arising Change	Make the necessary changes to the LDP	All those who made representations and anyone else who has declared an interest in the Examination/the LDP process.	Consult on the Matters Arising Change in accordance with guidelines by the Inspector.	Decision following the Inspector's Report	Postage costs Administrative costs	An assessment of the matters arising change will need to be undertaken and it will be available as part of the consultation on these matters.

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

Period 7: Publish the Public Examination Report (Regulation 24) When: August 2027 (indicative)

Which stage and when?	Purpose	Participants	How? Participation/consultation method	Reporting back method	Resources (in addition to usual staffing costs)	<u>SA/SEA/ISA</u>
Accept/publish the Public Examination Report	Inform of the Inspector's decisions from the Public Examination	Elected members Specific consultation bodies General consultation bodies Key Stakeholders Group of the LDP All those who made representations, the public and any other interested parties	Letter/e-mail those who made representations and other relevant stakeholders informing them of the Report's existence and where it can be viewed and any other relevant details. Various techniques to raise awareness, (e.g. Information on the Council website and social media) Publish the Report available for examination on the Council website and in the relevant public places.	Not relevant	Printing costs Administrative costs	Not relevant

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

Prepare the Council's response to the Examination Report	Raise awareness of any significant changes that will need to be undertaken to comply with the Examination Report (Note: the Council or the stakeholders will have no right to object to any changes the Inspector wants to see)	Elected members	Report to the Cabinet highlighting any significant changes. Report to the full Council to receive a decision to adopt the LDP	Publish Cabinet and Full Council minutes on the Council website.		

Period 8 Adopting the LDP (Regulation 25) When: September / October 2027 (indicative)

Which stage and when?	Purpose	Participants	How? Participation/consultation method	Reporting back method	Resources (in addition to usual staffing costs)	<u>SA/SEA/ISA</u>
Adopt the LDP formally as the statutory development plan for the Gwynedd Planning Authority area (within 8	Inform stakeholders and the public of the decision to adopt the LDP	Elected members All those who made representations and anyone else who has declared	Letter/e-mail all those who made representations and other relevant stakeholders informing them of the LDP's adoption,	Not relevant	Postage costs Printing costs Administrative costs	

Appendix 2 – Delivery Agreement Gwynedd Local Development Plan

weeks of receiving the Examination Report)		an interest in the LDP process The public	and enclose a copy of the statement of adoption. Publish all LDP documents, including the adoption statement, on the Council website and in the relevant public places. Various techniques to raise awareness, (e.g. Information on the Council website and social media) Send 4 copies of the LDP and the adoption statement to the Welsh Government.			

Appendix 3 – Delivery Agreement Gwynedd Local Development Plan

Appendix 3 - An Idea of Reports and Decisions at Key Stages in the Local Development Plan

	1		2		3		4		5	6
	Delivery Agreement	Report on the responses to the consultation	Strategic Options, vision and objectives	Report on the responses to the consultation	Preferred Strategy	Report on the responses to the consultation	Deposit Plan	Report on the responses to the consultation	Submit for Examination	Adoption of the Plan
Planning Policy Working Group	Consider and present comments to Cabinet	Consider and present comments to Cabinet	Consider and present comments to Cabinet	Consider and present comments to Cabinet	Consider and present comments to Cabinet	Consider and present comments to Cabinet	Consider and present comments to Cabinet	Consider and present comments to Cabinet	Consider and present comments to Cabinet	
Scrutiny Committee	Scrutinise and present comments to Cabinet		Scrutinise and present comments to Cabinet		Scrutinise and present comments to Cabinet					
Cabinet	Agree for public consultation	Accept and make recommendation to Full Council	Agree consultation for	Agree	Agree consultation for	Accept and make recommendation to Full Council	Agree consultation for	Agree	Accept and make recommendation to Full Council	
Full Council		Agree (statutory)				Agree			Agree	Adoption (statutory)

Appendix 4 – Delivery Agreement Gwynedd Local Development Plan

Appendix 4 – Soundness Tests

Preparation Requirements:

- Has the work of preparing the plan complied with legal and regulatory procedural requirements? (LDPs Regulations, Community Involvement Scheme, SEA Regulations, Sustainability Appraisal, HRA etc.?)
- Does the plan generally comply with the NDF and/or the Strategic Development Plan? (when published or adopted respectively)

Test 1: Is the plan suitable? (Is it clear that the LDP is consistent with other plans?)

Questions

- Does it consider national policy (PPW) and the Wales Spatial Plan (NDF when published)?
- Does it consider the Well-being Aims?
- Does it consider the Wales National Marine Plan?
- Does it consider the relevant Area Statement?
- Does the plan generally comply with the NDF (when published)?
- Does the plan generally comply with the relevant Strategic Development Plan (when adopted)?
- Is it consistent with regional plans, strategies and utilities provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it consider the Well-being Plan or the National Park's Management Plan?
- Has the LPA shown that it has taken advantage of each opportunity to collaborate and cooperate on preparing plans and the evidence base?

Test 2: Is the plan appropriate? (Is the plan appropriate for the area in light of the evidence?)

Questions

- Is it specific for the local area?
- Does it deal with key matters?
- Is it supported by robust, commensurate and credible evidence?
- Can the logic at the root of the plan's policies be demonstrated?
- Does it seek to meet the assessed needs and contribute towards delivering sustainable development?
- Is the vision and strategy positive and ambitious enough?
- Have the 'real' alternative choices been deemed appropriate?
- Is it logical, rational and balanced?
- Is it coherent and consistent?
- Is it clear and does it have focus?

Appendix 4 – Delivery Agreement Gwynedd Local Development Plan

Test 3: Will the plan deliver (Is it likely to be effective?)

Questions

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will the development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible?
- Are there appropriate contingency provisions?
- Is it monitored effectively?

Appendix 5 – Delivery Agreement Gwynedd Local Development Plan

Appendix 5 - Potential risks and response methods

Risk	Possible impact	Mitigation measures
1. Further requirements deriving from new national legislation or guidelines	- Need to undertake more work to amend the Plan and work programme. - Programme slipping.	Monitor work being undertaken in terms of new legislations and guidelines so that we are in a good position to respond as early and effectively as possible to any change.
2. Heavier work load than expected	- Programme slipping. - Failing to report to committees in a timely manner.	- Ensure a realistic timetable with flexibility. - Ensure that we consider how much time it takes to undertake every aspect of the work. - Consider additional resources.
3. Substantial objections from consulted bodies	Programme slipping.	- Flexibility in the timetable. - Ensure that we consult early (before the formal consultation periods) with specific bodies.
4. Lack of political consensus	- Failure to agree on key aspects in the Plan. - Conflict undermining what is noted in the Plan.	Seek to resolve as much conflict as possible at the meetings of the Planning Policy Working Group and by discussing with leading Members e.g. portfolio leaders.
5. Failing to report to a committee at an appropriate time	Programme slipping	Discuss the needs of the process with the organisers of the committees' annual programme in a timely manner

Appendix 5 – Delivery Agreement Gwynedd Local Development Plan

Risk	Possible impact	Mitigation measures
6. Lack of consensus between different departments of the Councils	Failure to agree on key aspects in the Plan.	• Ensure that we concur with the Council's priorities • Ensure that effective internal negotiation procedures are in place in terms of the Plan.
7. Delay with translation/printing process	Programme slipping.	• Use external translators. • Share the translation work to different individuals/companies • Consider additional resources.
8. Lack of funding available throughout the process of preparing the Plan.	• Failure to fund specific and important work tasks e.g. as part of the evidence base. • Programme slipping.	• Regular monitoring to ensure that funding is used in the most effective way possible.
9. Change/loss of staff	• Loss of capacity and skills. • More pressure on the other officers. • Programme slipping.	• Consider additional resources.
10. Lack of expertise	• Lower standard of work. • Failure to identify weaknesses and note suggestions when verifying work from consultants. • Problems in terms of ensuring the 'soundness' of the Plan.	• Train specific staff to specialise in different fields. • Use specialist consultants where the expertise is not within the service

Appendix 5 – Delivery Agreement Gwynedd Local Development Plan

Risk	Possible impact	Mitigation measures
11. PEDW failing to meet the timetable/targets	Delay in terms of holding the investigation and/or receiving the report.	Ensure close contact with the Planning Inspectorate to ensure an easy as possible process. This will also be a way of receiving an early notice regarding any problems.
12. Plan failing the 'soundness' test	The Plan cannot be adopted without having to undertake substantial further work.	Ensure that the LDP is sound by ensuring that we comply with procedures, acts, regulations, along with all specific soundness tests.
13. Legal challenge	- Abolish the adopted LDP (or parts of it). - Additional work pressures.	Ensure that we comply with procedures, acts, regulations etc.
14. Elections	- Programme slipping. - New members with different opinions regarding the contents of the Plan - priorities changing.	Ensure a realistic timetable with flexibility.
15. Problems with IT work. / Problems in terms of GIS work	Programme slipping.	- Ensure a realistic timetable with flexibility. - Ensure that the Council's Information Technology Service is aware of the needs and programmes time for us. - Purchase bespoke software.

Appendix 5 – Delivery Agreement Gwynedd Local Development Plan

Risk	Possible impact	Mitigation measures
16. Results of the SA/SEA outlining unexpected problem(s).	• Additional work load. • Programme slipping.	• Ensure that the timetable is sufficiently flexible to cope with such a situation. • Consider additional resources.
17. Consulted bodies failing to provide observations as quickly as expected.	Programme slipping.	• Ensure that specific groups are consulted with promptly within any relevant step in the process. • Seek to consult at times of the year where the majority of people are likely to be at work e.g. not during August or over Christmas.
18. Receive significant late information.	• Programme slipping. • Additional work pressures.	Ensure that the timetable is sufficiently flexible to cope with such a situation.
19. Unexpected major infrastructure projects proceeding	• Programme slipping. • Additional work pressures.	
20. Consultations - not consulting in the best way to get to the right people	• Not getting responses to the content of the documents from a cross section of the community • Program slipping due to the need for more consultation work • Additional workload	Consider different methods of consultation to reach the people who have not been responding. Make an assessment following the consultation periods to see who has responded.

Appendix 6 – Delivery Agreement Gwynedd Local Development Plan

Appendix 6 – List of Consultees

Specific Consultation Bodies (Reg 2 LDP)

Government Bodies

- National Resources Wales
- Welsh Government
- Cadw
- Secretary of State for Wales (UK)
- Secretary of State for Transport (UK)
- Secretary of State Business, Energy and Industrial Strategy (UK)
- The Home Office
- Ministry of Defence

Adjoining Local Authorities

- The Isle of Anglesey County Council
- Eryri National Park Authority
- Denbighshire County Council
- Ceredigion County Council
- Conwy County Borough Council
- Powys County Council

City/ Community/ Town Councils Gwynedd (excluding Eryri National Park)

Arfon

Bangor City Council
Betws Garmon Community Council
Bethesda Community Council
Bontnewydd Community Council
Caernarfon Town Council
Llanberis Community Council
Llandwrog Community Council
Llanddeiniolen Community Council
Llanllechid Community Council
Llanllyfni Community Council
Llanrug Community Council
Llanwnda Community Council
Pentir Community Council
Waunfawr Community Council
Y Felinheli Community Council

Dwyfor

Aberdaron Community Council
Botwnnog Community Council
Buan Community Council
Clynnog Community Council
Criccieth Town Council

Appendix 6 – Delivery Agreement Gwynedd Local Development Plan

Dolbenmaen Community Council
Llanaelhaearn Community Council
Llanbedrog Community Council
Llanengan Community Council
Llannor Community Council
Llanystumdwy Community Council
Nefyn Town Council
Pistyll Community Council
Porthmadog Town Council
Pwllheli Town Council

Meirionnydd

Abermaw Town Council
Arthog Community Council
Corris Community Council
Ffestiniog Town Council
Llandderfel Community Council
Llanfrothen Community Council
Llangywer Community Council
Mawddwy Community Council
Penrhyndeudraeth Town Council
Tudweiliog Community Council
Tywyn Town Council

City/ Community/ Town Councils that adjoin the Gwynedd Local Planning Authority Area

Eryri National Park Authority

Abergwyngregyn Community Council
Aberdyfi Community Council
Bala Town Council
Beddgelert Community Council
Brithdir, Llanfachreth, a Rhydymain Community Council
Bro Machno Community Council
Bryncrug Community Council
Cerrigydrudion Community Council
Dolgellau Town Council
Dolwyddelan Community Council
Dyffryn Ardudwy a Thalybont Corris Community Council
Ganllwyd Community Council
Harlech Town Council
Llanbedr Community Council
Llanegryn Community Council
Llanelltyd Community Council
Llanfair Community Council
Llanfihangel-y-Pennant Community Council
Llangelynnin Community Council
Llanuwchllyn Community Council
Llanycil Community Council
Maentwrog Community Council
Pennal Community Council

Appendix 6 – Delivery Agreement Gwynedd Local Development Plan

Talsarnau Community Council
Trawsfynydd Community Council

The Isle of Anglesey County Council

Beaumaris Town Council
Cwm Cadnant Community Council
Llanddaniel Community Council
Llanfairpwll Community Council
Llangoed Community Council
Llanidan Community Council
Menai Bridge Town Council
Rhosyr Community Council

Conwy County Council

Llangwm Community Council
Llanfairfechan Community Council

Denbighshire County Council

Llandrillo Community Council
Cynwyd Community Council
Corwen Community Council

Powys County Council

Glantwymyn Community Council

Health, Infrastructure and Electronic Communications Providers

Betsi Cadwaladr University Health Board
Welsh Water
National Grid
Scottish Power
SP Energy Networks
Wales and West Utilities
British Telecommunications plc
Mobile Operators Association

General Consultation Bodies

Voluntary bodies and others

Age Concern (Cymru)
Barnados
The Conservation Volunteers Group: TCV
Council for the Protection of Rural Wales
Mantell Gwynedd
Cyfeillion Storiell
Wales Council for Voluntary Action
Barmouth Resort Improvement Group

Appendix 6 – Delivery Agreement Gwynedd Local Development Plan

Bangor Students Union

Bangor Creadigol

Mudiad Ysgolion Meithrin

Bangor Civic Society

Envirowatch UK

~~Friends of the Earth (Mon & Gwynedd)~~ **North West Wales Climate Action**

Greenpeace

Keep Wales Tidy

Mudiad Ffermwyr Ifanc

Hafal

Shelter Cymru

Youth Hostel Association

National Trust

North Wales Wildlife Trust

Nest

The Ramblers Association

RSPB

Sports Wales

Sustrans

Early Years Wales

Visit Wales

Play Wales

Croeso Menai

The National Residential Association

Gwynedd Archeological Trust

Bodies representing interests of various racial, ethnic or national groups

North Wales Race Equality Network

The Traveler Movement

Friends, Families of Travelers

Equality and Human Rights Commission

BEN (Black Environment Network)

Black Association of Women Step Out (BAWSO)

Diverse Cymru Mental Health and Well Being Hub Service

Inter-Cultural Skills Network

Bangor University Afro-Caribbean Society

Bodies representing various religious groups

Bangor Cathedral

Presbyterian Church of Wales – Henaduriaeth Arfon

Coleg y Bala

Congregational Federation Wales

Bangor Islamic Centre

Diocese of Bangor

Appendix 6 – Delivery Agreement Gwynedd Local Development Plan

Baptist Union of Wales
CYTUN
British Humanist Association
Kalpa Bhadra Kadampa Buddhist Centre
Llandudno and Colwyn Bay Hebrew Congregation
British Humanist Association
Hindu Council UK
Muslim Council of Wales
Quakers
The Catholic Church in England and Wales
The Methodist Church in Wales
The Presbyterian Church in Wales
Buddhist Council for Wales
Sikh Council for Wales

Bodies representing the interest of disabled individuals

Alzheimer's Society
British Heart Foundation
Mencap Cymru
Agoriad Cyf.
Mind Cymru
Antur Waunfawr
British Deaf Association
NDCS – National Deaf Children's Society
RNIB Cymru
Cwmni Seren Ffestiniog Cyf
Centre for Sign Sight Sound
Meter Fachwen
MS Service – Gwynedd/Ynys Môn Group
Fforwm Anableddau Taran Cyf
NAS Cymru
North Wales Cancer Patients Forum
Shine
Scope Cwmpas Cymru
Sense Cymru
Disability Wales
SNAP Cymru
Wales Epilepsy Support Group
Canolfan Felin Fach
Arfon Access Group
Dwyfor Access Group
Meirionnydd Access Group
Carers Trust North Wales-Crossroads Care Services
Headway Gwynedd

Appendix 6 – Delivery Agreement Gwynedd Local Development Plan

Riding for the Disabled Treborth
Riding for the Disabled Meirionnydd
Versus Arthritis
Blind Veterans UK
The Abbey Road Centre
Epilepsy Cymru
Cynnal Gofalwyr Gwynedd
Wales Council for Deaf People
Dolgellau Hard of Hearing and Luncheon Club
Down's Syndrome Association
North Wales Society for the Blind - Bangor
Anheddau Cyf
Deafblind Cymru

Bodies representing the interests of those that run a business

Chamber of Commerce
Federation of Small Business
Farmers Union of Wales
National Farmers Union
Tywyn Chamber of Tourism & Commerce
Chartered Institute of Building – North Wales Centre
HBF – Home Builders Federation
Tourism Partnership North Wales

Bodies representing the interests of Welsh culture

Welsh Language Commissioner
Cymdeithas yr Iaith
Merched y Wawr
Urdd Gobaith Cymru
Urdd Eryri
Urdd Meirionnydd
Mudiad Meithrin
Cymraeg i Blant Gogledd Orllewin
Undeb Myfyrwyr Cymraeg Bangor (UMCB)
Dyfodol yr Iaith
Menter Iaith Bangor
Ffederasiwn Ffermwyr Ifanc
~~Partneriaeth Ogwen~~
Dyffryn Nantlle 20:20
Hunaniaith
Cylch yr Iaith
Cymunedoli
Fforwm Iaith Gwynedd

Cyfeillion Llyn

Appendix 6 – Delivery Agreement Gwynedd Local Development Plan

Papurau Bro –

Blewyn Glas
Dail Dysynni
Eco'r Wyddfa
Goriad
Llafar Bro
Llais Ardudwy
Llais Ogwan
Llanw Llŷn
Lleu
Llygad y Dydd
Papur Dre
Pethe Penllyn
Y Ffynnon
Yr Wylan

Bodies representing social enterprises

Cymunedoli

Antur Aelhaearn

Antur Nantlle

Antur Stiniog Cyf

Antur Waunfawr

Canolfan Ysgrifennu Tŷ Newydd

Cwmni Bro Ffestiniog

Cwmni Nod Glas

Datblygu Egni Gwledig (DEG)

Dref Werdd

Galeri, Caernarfon

GISDA

GwyrddNi

Hafod Ceiri

Llety Arall

Menter Felinheli

Menter Iaith Gwynedd

Menter Tŷ'n Llan, Llandwrog

Menter Y Plu, Llanystumdwy

Menter Y Tŵr, Pwllheli

Menter y Glan, Pennal

O Ddrws i Ddrws

Partneriaeth Ogwen

Pengwern Cymunedol

Prosiectau Cymunedol Aberdyfi

Plas Carmel

Cwmni Pump Plwy Penllyn

Seren

Sylfaen Cymunedol

Menter yr Eagles

Tafarn yr Heliwr

Appendix 6 – Delivery Agreement Gwynedd Local Development Plan

Ymddiriedolaeth Ynys Enlli
Ynni Cymunedol Cymru
Ynni Llŷn
Yr Orsaf, Penygroes

Groups that represent LGBTQ+

Stonewall
Unique Transgender Support Network
Wipe out Transphobia
MESMAC North Wales
Rustic Rainbow

Specific Consultation Bodies

Other interested parties

Housing Associations that operate within the LPA:

- Grwp Cynefin
- Adra
- Clwyd Alun
- North Wales Housing

North Wales Probation Service
North Wales Police
North Wales Fire and Rescue
Grŵp Llandrillo Menai

Assessing the Impact on Protected Characteristics, the Welsh Language and Socio-Economic Disadvantage

For help to complete this form see the *How to Undertake an Equality Impact Assessment* leaflet. You are also welcome to contact Delyth Gadlys Williams, Policy and Equality Officer on ext. 32708 or DelythGadlysWilliams@gwynedd.llyw.cymru for further assistance.

The Council's is required (under the Equality Act 2010) to consider the effect any change in policy or procedure (or the creation of a new policy or procedure), has on people with protected equality characteristics. The Council also has a general duty to ensure fairness and foster good relations. A timely Equality Impact Assessment must be undertaken before making any decision on any relevant change (i.e. which has an effect on people with protected characteristics).

The Council is also required, under the requirements of the Welsh Language Standards (Section 44 of the Welsh Language (Wales) Measure 2011) to consider the effect of a change in any policy or procedure (or the creation of a new policy or procedure), in its opportunities for people to use Welsh and to ensure that Welsh is not treated less favourably than English. This document therefore ensures that these decisions protect and promote the use of the Welsh language.

From April 1st 2021 the Council has a duty to have due regard to tackling socio-economic disadvantage in strategic decisions.

1) Details

1.1. What is the name of the policy / service in question?

Gwynedd Local Development Plan Delivery Agreement (DA)

1.2 What is the purpose of the policy / service that is being created or amended? What changes are being considered?

The purpose of the document is to set out a timetable for the statutory steps that need to be undertaken in the preparation of a Local Development Plan. The document also includes a community involvement scheme that sets out how, when with whom we will consult with (which includes organisations representing the characteristics of equality, the Welsh language and the economically disadvantaged).

The Local Development Plan (in its final form) is a planning policy document that provides guidance in informing decisions on future development proposals and addressing the needs and opportunities of the area. The Local Development Plan must contribute to achieving sustainable development and be consistent with the relevant national and regional planning principles and

policies. In essence, the purpose of a Local Development Plan is to provide guidance as to the types of developments suitable in different locations. The law makes it clear that decisions on planning applications should be made in accordance with the policies within the Local Development Plan unless there are other relevant planning considerations.

1.3 Who is responsible for this assessment?

Heledd Fflur Jones – Planning Policy Team Leader

1.4 When did you commence the assessment? Which version is this?

Version 2.

This assessment has been modified following the public consultation period. Detailed assessments will be made at the stages of LDP preparation. Version 1 of this document can be examined as part of the information pack prepared in relation to the public consultation period.

2) Action

2.1 Who are the stakeholders or partners you need to work with to undertake this assessment?

The People of Gwynedd

People who have shown an interest in the preparation of a Local Development Plan or commented on the Joint Local Development Plan.

Organisations that support or represent people with certain equality characteristics with its members.

North Wales Public Sector Organisations.

Annex 6 of the Delivery Agreement sets out a full list of stakeholders.

As part of the consultation on the Draft Delivery Agreement we asked if the Council is consulting with the right people. As a result of the consultation period, additional stakeholders have been identified. As a result, the list of stakeholders associated with the preparation of the Local Development Plan has been modified.

2.2 What measures have you taken to engage with people with equality characteristics, regarding the Welsh language or with communities (either of place or of need) that live with socio-economic disadvantage?

Annex 6 of the Delivery Agreement highlights the statutory and non-statutory stakeholders where it is incumbent to contact and inform them of the various steps involved in preparing the Local Development Plan. In terms of the non-statutory stakeholders who have been listed, these

include organisations and partners representing people with protected characteristics, the Welsh language and or and economically disadvantaged communities. Furthermore, the Planning Policy Service has a contacts base-data containing details of individuals who have expressed an interest in the Local Development Plan and the preparation process.

It is a statutory requirement to consult with general and specific consultation bodies on the contents of the Delivery Agreement. However, it was considered necessary to exceed these statutory requirements by undertaking wider public consultation.

Awareness of the public consultation period was raised by: -

- Informing statutory and non-statutory stakeholders;
- Notifying local members;
- Notifying Community/Town/City Councils;
- Notifying neighbouring Local Authorities;
- Notifying individuals/organisations who have declared an interest in the LDP (contacts database, 1,316 in number);
- Sharing regular messages on the Council's social media sites (Facebook, Instagram and X).

Further it was ensured that the relevant material required to facilitate the submission of representations including the Draft Delivery Agreement and the Integrated Impact Assessment (see Appendix 3) were available for inspection in the following places:-

- Hard copy at Siop Gwynedd Caernarfon, Dolgellau and Pwllheli;
- Hard copy in the public local libraries;
- Council website

To facilitate the process of commenting on the Draft Delivery Agreement a comment form (hard copy and interactive copy) was provided. The form asked general questions on the various sections of the Draft Delivery Agreement, with a total of 9 specific questions asked. The first seven questions were general questions relating to the Delivery Agreement, question 8 was specifically relevant to the impact of the Delivery Agreement on the Welsh language and question 9 was about the impact on individuals and protected characteristics and the economically disadvantaged.

The public consultation period took place between 26 October 2023 and 7 December 2023. 14 individuals/organisations responded to the consultation with a total of 37 comments.

2.3 What was the result of the engagement?

As a result of the engagement period comments have been received in relation to the contents of the Delivery Agreement. Consideration has been given to the relevance of those representations and consequently, when appropriate, amendments has been proposed to the contents of the Delivery Agreement. These amendments are considered to add value and integrity to the Delivery Agreement. These comments can be explored in the Consultation Report (Appendix 2).

2.4 On the basis of what other evidence are you operating?

The Planning and Compulsory Purchase Act 2004 requires local planning authorities in Wales to prepare a Local Development Plan (LDP) for their areas. A DA must be prepared before it can progress to the formal LDP preparation process.

The Town and Country Planning (Local Development Plans) (Wales) Regulations 2005 set out the regulations that must be followed in the preparation of a Delivery Agreement.

The preparation of a Local Development Plan is a priority in Gwynedd Council's Plan 2023-28.

2.5 Are there any gaps in the evidence that needs to be collected?

No gaps identified.

3) Identifying the Impact

3.1 The Council must give due regard to the effect any changes will have on people with the equality characteristics noted below. What impact will the new policy/service or the proposed changes in the policy or service have on people with these characteristics?

Characteristics	What type of impact? *	In what way? What is the evidence?
Race (including nationality)	None	Although a question was asked relating to the impact of the Delivery Agreement on individuals who have equality characteristics, no representation was received during the public consultation period in relation to race. If it becomes apparent during subsequent consultation exercises that there is an impact on these specific characteristics, we will consider appropriate measures for avoiding/mitigating the effect.

Disability	None	Although a question was asked relating to the impact of the Delivery Agreement on individuals who have equality characteristics, no representation was received during the public consultation period in relation to disability. If it becomes apparent during subsequent consultation exercises that there is an impact on these specific characteristics, we will consider appropriate measures for avoiding/mitigating the effect.
Sex	No impact	Although a question was asked relating to the impact of the Delivery Agreement on individuals who have equality characteristics, no representation was received during the public consultation period in relation to sex. If it becomes apparent during subsequent consultation exercises that there is an impact on these specific characteristics, we will consider appropriate measures for avoiding/mitigating the effect.
Age	Positive	During the public consultation period it was expressed that there was a lack of housing provision for young families in the county. Further consideration will be given to how the Local Development Plan can meet the needs of all Gwynedd residents (of all ages) as the process of preparing and formulating the Plan progresses. Please see the full representation and response to this issue in Appendix I – Consultation Report.
Sexual orientation	No impact	Although a question was asked relating to the impact of the Delivery Agreement on individuals who have equality characteristics, no representation was received during the public consultation period in relation to sexual orientation. If it becomes apparent during subsequent consultation exercises that there is an impact on these specific characteristics, we will consider appropriate measures for avoiding/mitigating the effect.
Religion or belief (or non-belief)	No impact	Representation was received relating to the fact that the bodies listed in Annex 6 of the Delivery Agreement are "umbrella" organisations. They indicated that they wished to be informed of all changes that might affect their church. It is emphasised that there is an opportunity for any organisation/charity/individual interested in the Plan to contact the Planning Policy Service with their contact details. Those details will be added to the Development Plan contacts database (meaning that they will be notified during

		the key phases of Plan preparation and their opportunities to provide input into the process). Please see the full representation and response to this issue in Appendix I – Consultation Report.
Gender reassignment	No impact	Although a question was asked relating to the impact of the Delivery Agreement on individuals who have equality characteristics, no representation was received during the public consultation period in relation to gender reassignment. If it becomes apparent during subsequent consultation exercises that there is an impact on these specific characteristics, we will consider appropriate measures for avoiding/mitigating the effect.
Pregnancy and maternity	Positive	Although a question was asked relating to the impact of the Delivery Agreement on individuals who have equality characteristics, no representation was received during the public consultation period in relation to pregnancy and maternity. If it becomes apparent during subsequent consultation exercises that there is an impact on these specific characteristics, we will consider appropriate measures for avoiding/mitigating the effect.
Marriage and civil partnership	No impact	Although a question was asked relating to the impact of the Delivery Agreement on individuals who have equality characteristics, no representation was received during the public consultation period in relation to marriage and civil partnership. If it becomes apparent during subsequent consultation exercises that there is an impact on these specific characteristics, we will consider appropriate measures for avoiding/mitigating the effect.
The Welsh language	Positive	A specific question was included in the consultation on the Welsh language. Comments have been received on the need to ensure that the impact of the Plan on the Welsh language is given full consideration. It is emphasised that considering the likely impacts of the LDP on the Welsh language is an essential element of the SA. The LDP Handbook encourages undertaking an integrated approach to impact assessment when undertaking LDP preparation, noting that it offers an opportunity to undertake an assessment that is more transparent, proportional and comprehensive.

		No decision has yet been made on whether to carry out an integrated assessment or an individual Welsh language assessment. Further a representation was received relating to ensuring that discussions were held with the Gwynedd Language Forum. Opportunities for discussion and the Language Forum will be taken advantage of. Please see the full representation and response to this issue in Appendix I – Consultation Report.
Socio-Economic Disadvantage	Positive	A specific question was included in the questionnaire relating to considering the impact which the Delivery Agreement could have on individual with protected characteristics or those experiencing socio-economic disadvantage. As part of the comments received during the public consultation period, a comment was received regarding the lack of consideration given in the current Plan to the needs and role of all communities of Gwynedd and specifically South Gwynedd. This comment is premature. The detail of the content of the Local Development Plan, including the settlement hierarchy and growth strategy will be subject to consideration and consultation in relevant subsequent documents. The process of receiving communities' input into these subsequent documents will follow the Community Involvement Plan included in the Delivery Agreement. Representation has also been made on ensuring that input is received from communities in the preparation of the Plan. Every effort will be made to ensure that this is achieved. Further there is an opportunity for any individuals/organisations interested in LDP to include their details on our contacts database which meant we would receive correspondence regarding any future public consultation periods. A representation was received relating to ensuring that public consultation periods are held for a period longer than 6 weeks, this comment specifically related to ensuring that it provides opportunities for the socio-economic disadvantaged to be able to respond to consultation periods. Where appropriately and practical, further consideration will be given to undertaking public consultation periods for longer periods.

		A comment was submitted stating that the Plan and needs (housing growth) should be community led. Receiving the input of the public and the communities of Gwynedd is a core part of the preparation of the Plan. The role of the Council will be to consider what the needs and aspirations of Gwynedd communities are and to seek to achieve that vision within the Plan, as long as that is consistent with relevant national and regional planning policy guidance. Please see the full representation and response to this issue in Appendix I – Consultation Report.

* Delete as appropriate

3.2 The Council has a duty under the 2010 Equality Act to contribute positively to a fairer society by promoting equality and good relations in its activities regarding the following characteristics – age, gender, sexual orientation, religion, race, gender reassignment, disability and pregnancy and maternity. The Council must give due attention to the way any change affects these duties.

General Duties of the Equality Act	Does it have an impact?*	In what way? What is the evidence?
Abolishing illegal discrimination, harassment and victimisation	Possible	At this stage have done everything practical possible.
Promoting equal opportunities	Possible	At this stage have done everything possible to ensure this. The consultation ensured that people could have input and influence council decisions. Representation has been received to the consultation period which states that a 6-week period is not sufficient to undertake the public consultation period. It is ensured that all consultation periods align with the statutory requirements. If appropriate and where the timeframe permits consideration will also be given to the appropriateness of carrying out the consultation/ public engagement exercise for a period longer than 6 weeks.
Encouraging good relationships	Possible	A representation has been received which questions whether the Council is working well with the community and partners. The Delivery Agreement details the intended approach of engagement. Any opportunities to take advantage of and improve engagement will be acted upon where appropriate and practicable.

* to be deleted as appropriate

3.3 How does your proposal ensure that you work in accordance with the requirements of the Welsh Language Standards (Welsh Language (Wales) Measure 2011), to ensure that the Welsh language is not treated less favourably than English and that you seize every opportunity to promote the Welsh language (beyond providing services bilingually) and increase opportunities to use and learn the language in the community?

In accordance with the Council's Welsh language policies.

Following the public engagement period, comments were received which have led to amendments being undertaken to the Delivery Agreement, including adding clarity to the Delivery Agreement and making it clear that the Sustainability Appraisal will take linguistic impact into account (see Appendix 2).

3.4 What other measures or changes could you include to strengthen or change the policy / practice in order to have a positive impact on people's opportunities to use the Welsh language, and to reduce or prevent any adverse effects that the policy / practice may have on the Welsh language?

Throughout the process of preparing the Plan it will be necessary to ensure that the relevant requirements are fulfilled. An ongoing assessment of the Impact on the Welsh language will be undertaken and will influence the content of the Plan.

In line with the comments received during the public consultation period relating to the Delivery Agreement we will take all opportunities available to receive input from the public and organisations/interest groups.

3.5 How does the proposal show that you have had due regard to the need to address inequality caused by socio-economic disadvantage? (Note that this is about closing inequality gaps rather than just improving outcomes for everyone)?

Paper Copies available in libraries and Siop Gwynedd for digitally excluded people.

Representation was received during the public consultation period indicating the need to carry out the consultation exercise for a period exceeding 6 weeks to ensure that it gives everyone an appropriate opportunity to respond. When appropriate and possible further consideration will be given to undertaking engagement exercises for periods longer than six weeks.

3.6 What other measures or changes might you include to strengthen or change the policy / practice to show that you have had due regard to the need to reduce disproportionate outcomes as a result of socio-economic disadvantage, in accordance with the Socio-Economic Act?

- Consider holding relevant consultation periods for periods longer than six weeks.
- Consider alternative modes of engagement.

- Take advantage of opportunities for community engagement.

These are going to receive consideration before undertaking future public consultation exercise.

4) Analysing the Results

4.1 Is the policy therefore likely to have a significant, positive impact on any of the above and what is the reason for this?

No significant impact has been identified as a result of the consultation.

4.2 Is the policy therefore likely to have a significant, negative impact on any of the above and what is the reason for this?

No significant impact has been identified as a result of the consultation.

4.3 What should be done?

Choose one of the following:

Continue with the policy / service as it is robust	Yes
Adapt the policy to delete any barriers	
Suspend and delete the policy as the detrimental impacts are too big	
Continue with the policy as any detrimental impact can be justified	
No further action at this time because it is too soon to decide, or there is insufficient evidence	

4.4 If continuing with the project, what steps will you take to reduce or mitigate any negative impacts?

Throughout the stages of preparing the Local Development Plan an Equality Impact Assessment will be prepared and modified, as appropriate. If any negative impact is identified, measures will be implemented to mitigate those impacts.

- 4.5 If you are not taking any further action to delete or reduce the negative impacts, explain why here.**

Not relevant.

5) Monitoring

- 5.1 What steps will you take to monitor the impact and effectiveness of the policy or service (action plan)?**

Revisit and modify the Impact Assessment throughout the Local Development Plan preparation process and amend the Local Development Plan and related preparation documents as necessary.

CYNGOR GWYNEDD – Report to Cyngor Gwynedd Cabinet



Title of item:	Welsh Government Consultation: 'White Paper on ending homelessness in Wales'.
Cabinet Member:	Councillor Craig ab Iago, Cabinet Member for Housing and Property
Relevant officer:	Carys Fôn Williams, Head of Housing and Property
Date of meeting:	20 February 2024

1. The Decision sought:

- 1.1 To approve the content of the draft response to the Government's consultation on ending homelessness in Wales, included in Appendix 1.

2. The reason why the Cabinet needs to make the decision:

- 2.1 Welsh Government has published a white paper on 'ending homelessness in Wales' and a draft response has been prepared on behalf of the Council. The Cabinet is asked to approve the draft response because of the possible side effects by the proposed changes can have on the Councils' resources and budgets.

3. Introduction and Rationale

3.1 Background / Introduction

- 3.2 On 10 October 2023, Welsh Government published a public consultation on the 'White Paper on Ending Homelessness in Wales'.

- 3.3 The White Paper proposes basic and substantial changes to the Homelessness field, and the Government's intention is to present a Bill in the Senedd in 2024 and pass new legislation before the end of the current Senedd term in 2026.

- 3.4 A formal consultation period was held by the Government between 10 October 2023 and 16 January 2024. During that period, internal consultations were held with departments including Adults, Health and Wellbeing, Children and Supporting Families, Leadership Team and Corporate Support in order to present a draft response to the Government. The Cabinet is now asked to approve the response in order to confirm the final response to the Government.

4. The intention of the consultation on Ending Homeless in Wales

- 4.1 The consultation is split into 5 parts and is explained by the Government as below:

Part 1 – Changes to the main homelessness law

- a) Councils to create Personal Housing Plans (i.e., a document stating steps taken to help prevent someone from being homeless or help to secure accommodation) for every homeless person or family.
- b) Priority need (i.e., specific categories of people who are accepted as being in priority need for homelessness support) – take away this rule and ensure that everyone is able to receive help when they are homeless.
- c) Remove the intentionality rule (being ‘intentionally homeless’ means that the homeless situation, or the threat of being homeless, has been caused by something the applicant did, or did not do, intentionally).
- ch) Local connection (if an applicant does not have a local connection with Gwynedd, we can decide to send the applicant to another council where they have a connection, on the condition that it is reasonable for them to return to that area) – change this so that councils are able to be more flexible. For example, if someone is in danger if they stay in their own area.
- d) Change the legislation so that councils can decide to stop working with people when, for example, when they threaten staff or persistently miss appointments.

Part 2 – Welsh public bodies’ role in terms of homelessness prevention

- a) More public services, such as social services, to collaborate better with housing services to help someone keep their home. Also, public services need to better understand people’s problems and know what to do about them.

Part 3 – Targeted offers to prevent homelessness for the ones disproportionately affected

- a) Children and young people – They should also not be placed in unsupported, temporary housing.
- b) social services and local authorities need to work together to help children, young people and care experienced young people.
- c) health services and councils need to work together better to help people with mental health problems.
- ch) When someone leaves hospital, the hospital should check if they have a home. The Council should help people who might become homeless when they leave hospital.
- d) Domestic abuse – want to help more people in this area. For example, people who are being controlled or being abused in other ways.
- dd) Councils need to keep a list of accessible housing.
- e) People who are released from prison need to be prevented from being homeless.
- f) Review the guidelines – National Housing Pathway for ex-member of armed forces to make sure the rules are followed across all local authorities.

Part 4 – Access to housing

- a) no one under the age of 25 should be placed in temporary homes that does not have support.
- b) Social Landlords need to work together more to stop homelessness. For example, this would mean housing associations have to do more to find homes for people who are homeless.
- c) councils should be able to take people who do not need a home off waiting lists.

Part 5 - Implementation

- a) Extend the structures currently provided through local government scrutiny arrangements and social housing regulation in order to monitor the homeless prevention and the steps needed to implement the proposed legislative changes as well as continuous data collection arrangements in all parts of the housing and homelessness.

5. Response to the White Paper

5.1 We know that homelessness is much more than a housing matter, therefore the other Council departments were asked to contribute comments, including Adults, Health and Wellbeing, Children and Supporting Families, Leadership Team, and Corporate Support.

5.2 Generally, most recommendations in the White Paper are welcomed, and the policy direction the Government is following by introducing these recommendations. However, we believe we need to present the Government with comments regarding those recommendations that we do not agree with, or where we believe implementing the recommendations will create concerns for us in Gwynedd. Below is a summary of our response:

Proposed change to the definition of 'under threat of being homeless' from 56 days to 6 months	We are supportive of this proposal, however we are concerned about the possible effects on recourses needed to implement. Increasing the time threshold that someone is eligible to receive homeless support from 56 days before being homeless to 6 months will lead to significant increase in demand on the service, specifically the duty to prevent homelessness. It could possibly have an effect on homelessness prevention services funded currently through the Housing Support Grant because of the increase in the timescales in which the Council needs to act. The effect of this will need to be monitored carefully.
Proposed removal of the 'intentionality test'	We do not agree with this proposal as it is essential in some circumstances to end a homelessness duty, without it we risk facing keeping homeless cases open much longer than needed with obligations in terms of resources and costs.

Proposing to keep the 'local connection' test but extend the eligible categories	We agree with keeping the local connection test, but disagree with the intention to extend those who would be eligible due to the likely consequences on local services and resources. We accept numerous homelessness referrals from outside Gwynedd as it is, but we do not have to accept them, except in exceptional circumstances. Extending the eligible categories will lead to weakening our ability to refuse some of those referrals on the basis that they do not have a local connection. For example, a possibility could exist that a person without a local connection with Gwynedd who has left prison could express a desire to come to Gwynedd for a fresh start, and we would be duty-bound to accommodate them. This could have a significant effect on our ability to reduce the number of homelessness in the county. This is also seen as a risk in terms of resources, capacity and associated costs, for example providing emergency/temporary accommodation. This will lead to Gwynedd having a duty to accommodate more people than is currently housed.
Proposed strengthening of the duty on public bodies to work together on homelessness	We agree that this is a positive direction as it acknowledges that homelessness is not just a housing matter, and that close collaboration is needed between public organisations to tackle the situation. However we are concerned whether public organisations have the appropriate resources needed to collaborate in a time of budgetary constraints in the public sector, and furthermore what motivations will be provided to working together in cases where this is not happening at present.
Short-term proposals to make temporary accommodation more suitable	We agree with the general principle of providing quality accommodation to our clients. However, we are concerned that finding temporary accommodation of suitable quality is a challenge at present, and if standards increase further, it's very possible that the supply will decrease. There is also a possibility that more support will be needed for more people in temporary accommodation, as well as providing alternative support to what has been historically provided, leading to an obvious effect on our resources.
Proposed change regarding social housing allocations	We generally agree with the proposals, especially the proposal to introduce new legislative provision which would mean that Housing Associations would not be able to refuse a homeless person nomination from the Council for social housing except in exceptional and specific circumstances. This would lead to strengthening the arrangements already in place.

	We do not agree with the proposal to give additional priority to homeless people over other groups of people in urgent housing need e.g., a family needing an accessible property because due to a child's disability. However, we would welcome this as a power to be used (as opposed to a duty), in order to provide use with more flexibility and control locally.

5.3 As many of the recommendations are likely to have an effect on the resource levels needed to realise the changes, we have consulted with the Finance Department, and have received the following comments:

5.4 The intention to move away from being reactive to offering preventive is a principle which has been in place for several years, and in financial terms, we acknowledge fully that this is a direction which must be followed if spending in this field is to be kept under control.

5.5 However, we are concerned about a lack of necessary resources within public sector budgets in Wales to deal with the challenges and additional pressures which are proposed in the consultation document.

5.6 We are concerned that the Government has no comprehension of the size of many of the additional costs. Although estimated costs (and even savings) are proposed in places within the document, these types of studies tend to underestimate costs, or overstate savings. Furthermore, there is a risk that additional costs will fall upon us as a Council, and that no grants will be available, or not sufficient, to meet these costs.

5.7 Impact assessments on equality characteristics and the Welsh Language, and a Regulatory Impact Assessment attached with the White Paper have been prepared by the Government and have been included as appendices with the Report.

6. Next steps

6.1 Receive the Cabinet's approval on the response to the consultation on the White Paper included in Appendix 1.

6.2 Upon receiving the Cabinet's approval, the Council's response will be confirmed to the Government.

4. Statutory Officers' Comments

4.1 Chief Finance Officer

“I was given an opportunity to give input to the Council’s response to this consultation, and my comments have been included in paragraphs 5.3 to 5.6 above.”

4.2 Monitoring Officer

“No observations in relation to propriety.”

Appendices:

Appendix 1 – The Council’s response to the White Paper

Appendix 2 – Welsh Government’s Integrated Impact Assessment

Appendix 3 – Welsh Government’s Draft Regulatory Impact Assessment



Welsh Government

Consultation response form

Consultation on the White Paper on Ending Homelessness in Wales

Date of issue: 10 October 2023

Action required: Responses by 16 January 2024

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Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh

Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

This White Paper sets out a range of proposals for changes to policy and the law, to end homelessness in Wales.

How to respond

Please respond by completing the online form or completing this questionnaire and sending it to HomelessnessLegislationReform@gov.wales

If you intend to respond in writing, please send completed forms to:

Homelessness Prevention Legislation Team

Welsh Government

Cathays Park

Cardiff

CF10 3NQ

When you reply, it would be useful if you confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

- your name
- your position (if applicable), and
- the name of organisation (if applicable).

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Data Protection

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g., a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation.

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than 3 years.

Confidentiality

Responses to consultations may be made public on the internet or in a report.

If you would prefer your response to remain anonymous, please tick here: ☐

Reform of the current core legislation in respect of homelessness

Question 1

Do you agree these proposals will lead to increased prevention and relief of homelessness?

Yes/no

Yes, in principle.

Question 2

What are your reasons for this?

Cyngor Gwynedd is of the view that these proposals may lead to increased prevention and relief of homelessness, but there is a need to balance carefully against the unintended consequences that may arise from implementing these proposals. Furthermore, the ability to prevent/reduce cases of homelessness depends on a number of other factors, including the supply of properties, temporary accommodation and identifying sufficient resources to achieve the goal. It will also need to be ensured that this is considered fully within the context of the Code of Guidance.

Changing the definition of "threatened with homelessness" from 56 days to 6 months offers extra time to carry out prevention activities. However, despite having more time to carry out prevention work, we feel that it is highly likely that individuals and families will still contact the Authority at the last minute, leaving little time for officers to carry out further prevention work.

The Council agrees with the proposed change, namely the statutory duty to produce a Personal Housing Plan. This will lead to greater clarity of the Authority's responsibilities (and also the applicant) and the principle supports the aim of putting the person at the centre. The proposed change of establishing a statutory duty to review the needs assessment and Personal Housing Plan with the applicant within 8 weeks is also to be welcomed. However, there is also a need to weigh up carefully whether the necessary resources are available to achieve this.

Regular communication with applicants – We are supportive of the proposal but note that clear guidelines are required for local authorities specifically regarding the frequency of contact, in plenty of time before the provision comes into force.

Regarding the intention to propose a statutory duty to include an applicant's views on their accommodation in a Personal Housing Plan, the possible effect needs to be carefully considered. In a geographically large county such as Gwynedd, finding suitable accommodation in the necessary locations is a significant challenge, therefore it must be considered that this should not impede efforts to accommodate individuals.

The proposal to introduce a right to request a review in relation to the reasonable steps

taken, is likely to introduce another layer of a right to request a review. On this basis, we do not agree with the proposal. The Council is of the view that it already takes the applicant's needs and wishes into consideration as part of forming the reasonable steps.

We cannot agree with the proposal to give the right to request a review of the suitability of accommodation at any time during an applicant's occupation of the accommodation, and will need to continue with the current procedure of applying a time limit.

Adding other groups to the local connection test could significantly increase the number of out-of-area presentations, as many individuals who present from outside of the county currently note that they have a distant familial connection with the county. We are concerned that this could lead to a significant increase in the demand on our scarce resources (both human and financial), and will hinder our ability to accommodate the numerous individuals and families who are already presenting as homeless in the county.

Abolishing the intentionality test could lead to keeping the numbers high. More often than not, this is used when there is antisocial behaviour in an emergency property and when the individual has been given several warnings about the behaviour. The proposed change means that the individual would continue to be accommodated despite their antisocial behaviour.

There is considerable pressure across several services at present. It is not clear whether there are sufficient resources available in housing or social services departments to operate effectively, coupled with the lack of availability of housing/living units of the right type in the right places.

Question 3

Are there additional legislative proposals you think we should consider to improve the prevention and relief of homelessness?

Substantial further investment is needed in homelessness prevention services which operate outside the statutory area of work, to include educational work and changing culture so that becoming homeless is not unavoidable in some cases. There is also a need to consider proactive work that is beyond the proposals in the White Paper. The Third Sector, through the Housing Support Grant (and other non-public sources of funding) provides services that by now are completely essential and which support the statutory services. The investment in those services is essential to support the statutory work to try to achieve the aim of preventing homelessness.

Specific attention is needed to emergency housing for individuals who leave their home because of domestic violence, rather than an over-reliance on hostels. Additional resources will need to be secured to ensure an adequate supply.

Question 4

Do you agree with our proposal to abolish the priority need test?

Yes/no

The Council acknowledges the principle for considering doing this, but is alert to the fact that this could lead to additional challenges to an already over-stretched system. We therefore agree with the intention, but there will be a need to ensure more resources to enable the Council to continue operating the current system in the County.

Question 5

Do you agree with our proposal to abolish the Intentionality test?

Yes/no

No. Ending the use of intentionality would have a huge impact in Gwynedd. Without intentionality, there is no mechanism to bring duties towards service users to an end due to antisocial/abusive behaviour that are in breach of Cyngor Gwynedd's temporary accommodation rules. This would have an adverse impact on other service users in temporary accommodation and the community where the accommodation is located. In addition, it could lead to losing use of the property in the future. Under the new failure to co-operate test, it states that the duty can be brought to an end because of threatening behaviour towards local housing authority staff, but it is unclear whether threatening behaviour also applies to members of staff in private temporary accommodation.

Question 6

Do you agree with our proposal to keep the local connection test but add additional groups of people to the list of exemptions to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority?

Partly. We agree with keeping the local connection test – but we do not agree with adding other groups.

The concept of local connection and its use is important to Gwynedd for many reasons. The special features of the county mean that we have a duty to promote and encourage the county's Welsh culture. One possible outcome of this proposal is that more residents without local connection with Gwynedd would be accommodated in the county, depriving local residents who are in housing need. It is difficult to give our full support to this proposal as it stands, and we believe it needs to be developed more.

Prisoners' ability to present to the service because they want a 'fresh start' is a cause for concern, because this would significantly deplete the Authority's resources. This would likely lead to an increase in the number of complex cases that the Council deals with, and the lack of ability to plan for them.

At present, there are a high number of people presenting from nearby counties and from north-west England. Cyngor Gwynedd's Homelessness Service is already finding it difficult to provide for the clients we are currently supporting, as there is a shortage of affordable private accommodation in the area and a shortage of social housing.

Including broad definitions for groups such as young people under 25 years old and people seeking recovery after substance misuse is too generalised. This would possibly lead to increasing the pressure on the Service's resources and it would therefore be more

difficult to target the support to the right places.

The Council agrees in principle with the proposal to place a new duty on local housing authorities to help a person retain accommodation where the applicant has been helped to secure accommodation (which might be their existing accommodation) or where accommodation has been offered to and accepted by the applicant.

With regard to the narrower test which sets out a small number of clearly defined and limited grounds for the unreasonable failure to co-operate test – the Council agrees with the proposal, but strongly suggests that the staff/officers of temporary/emergency properties and staff who provide support should also be included in the definitions.

Question 7

The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Revising the definition of "threatened with homelessness" (specifically increasing the timetable from 56 days to 6 months) will certainly have an impact on resources and the likely need to employ more staff (in the medium term at least) until we reach a situation where the homelessness relief work reduces. Therefore, full consideration needs to be given to the possibilities and the likelihood of increased costs on care services because of the proposals to change. It is possible that more cases will need to be addressed because of broadening the definition of local connection.

It is recognised in the Regulatory Impact Assessment that many of the costs are unknown for the current requirements, let alone the new responsibilities that would befall local authorities due to the proposed changes. Where potential additional costs have been mentioned in the document, we have concern, based on the experiences of the period since 2020, that these costs have been underestimated. The aim of moving away from being reactive to offering a preventative service is a principle that has been in place for several years, and from a financial perspective we fully acknowledge that this is a route we must follow if we are to keep expenditure in the field under control, but we do have concern that there are not sufficient resources within the public sector's budgets in Wales to handle the challenges and the extra pressure that are proposed in the consultation document. It would create a false image of the situation should the Welsh Government use the current situation as a baseline, when the local authorities' homelessness services do not currently have adequate resources to meet the demand.

The role of the Welsh Public Service in preventing homelessness

Question 8

Do you agree with the proposals to apply a duty to identify, refer and co-operate on a set of relevant bodies in order to prevent homelessness?

Yes/no

Please give your reasons

The need to strengthen the collaboration between public services is obvious in respect of homelessness services, a homelessness problem is usually accompanied by many other social and health problems.

The Council welcomes the aim to strengthen the multi-agency approach of working with service users and ensuring there are specific requirements on each relevant body. Our main concern is the ability to establish effective arrangements for multi-agency co-operation given that most public services are already under significant pressure.

Question 9

Do you agree with the proposed relevant bodies, to which the duties to identify, refer and co-operate would apply? Would you add or remove any services from the list?

The Council agrees with the proposed relevant bodies.

Question 10

In your view have we struck the right balance between legislative requirements and operational practice, particularly in relation to health?

The Council's opinion is that the balance is right, however, there is a need to consider the challenge of putting in place firm regional strategic arrangements. This involves considering how any new arrangements will sit within existing regional boards and how will the multi-agency effort to reduce homelessness work at an operational and strategic level.

Regarding complex cases, if it is intended to expand multi-disciplinary teams that include officers from several organisations, there must be consideration to adequate resources and training. Consideration must also be given to the need for clear communication and promoting understanding of the legislative requirements amongst all staff.

Question 11

What practical measures will need to be in place for the proposed duties to identify, refer and co-operate to work effectively? Please consider learning and development needs, resources, staffing, location and culture.

With the proposed change, it is crucial that all organisations understand the homelessness legislation, what the Authority's responsibilities are, and also what their responsibilities are. Therefore, regular training will be required for the organisations. It is also essential that activity planning is undertaken using a cross-organisational method, as the effect of homelessness and an individual's well-being extends beyond individual organisations.

Question 12

In addition to the broad duties to identify, refer and co-operate, this chapter contains proposals to provide enhanced case co-ordination for those with multiple and complex needs. To what extent will the proposals assist in preventing homelessness amongst this group?

The Council agrees with the principle, however it is important that there is effective collaboration and communication across agencies on cases in general, not just complex cases. The proposals could offer the potential to prevent homelessness in complex cases as it will avoid situations where the organisations are working across each other.

Question 13

The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Please see the response to Question 7 paragraph 2.

Targeted proposals to prevent homelessness for those disproportionately affected

Question 14

Are there other groups of people, not captured within this section, which you believe to be disproportionately impacted by homelessness and in need of additional targeted activity to prevent and relieve this homelessness (please provide evidence to support your views)?

We agree with the recommendation in paragraph 252 of the Consultation, but we would propose that the following groups also be included:

- Young offenders
- LGBTQ+
- Gypsies and travellers

We believe that the groups listed above are more likely to be affected by homelessness because of their particular characteristics.

Question 15

What additional legislative or policy actions could be taken to prevent or relieve homelessness for the groups captured by this White Paper?

We need to consider new legislation to ensure that multi-agency arrangements are an expectation for the initial contact with individuals who present as homeless, to ensure that preventative work is everyone's responsibility.

In the case of prisoners, we are generally supportive of the proposal for prevention activity to happen at the reception stage, but are concerned regarding the resources and the co-ordination between public agencies that would be required to implement this.

We also agree with the proposal to set out clearly in legislation that someone who is in prison is not homeless, but we believe that a timely and proactive plan will be needed to address homelessness at the point of release from prison.

With regard to retaining accommodation, we agree with the principle that already exists in the pathway for prisoners, and which is already being implemented.

Question 16

Our proposals related to children, young people and care experience seek to improve and clarify links between homelessness legislation and the Social Services and Wellbeing Act. Significant policy development is required to assess the practicality of this. What, in your views are the benefits and challenges of our approach and what unintended consequences should we prepare to mitigate?

The Local Authority already provides support for young people leaving care. Cyngor Gwynedd's Children and Supporting Families Department try to ensure that there are accommodation options available by working with the Third Sector to identify accommodation that is suitable for the individual's needs. There is a significant challenge currently in terms of offering suitable accommodation for young people post-18, as the options for them to move on to live independently are very limited. Furthermore, there is a lack of options for young people with complex needs to live independently.

Question 17

Do our proposals go far enough to ensure that 16 and 17 year olds who are homeless or at risk of homelessness receive joint support from social services and local housing authorities? What more could be done to strengthen practice and deliver the broader corporate parenting responsibilities?

The Council fulfils a responsibility as a corporate parent, and notes that substantial capital funding must be identified to implement any change. We provide accommodation for young people aged 16 and 17 in supported housing, but some individuals in this age bracket move away because they feel there are better opportunities out-of-county and in civic areas. Although, the parent and corporate responsibility for these individuals remains with the Council.

There will be a need to be aware of the need to assess and commission specialist support services for 16 and 17 years olds who are facing homelessness or are homeless.

Question 18

Do you agree or disagree that the Renting Homes (Wales) Act 2016 should be amended to allow 16 and 17 year olds to be able to hold occupation contracts??

Disagree, we do not support this proposal.

Young people aged 16 and 17 years old are very likely to be less aware of the implications and terms of occupation contracts, especially if they are vulnerable because of homelessness, even with support from support services. You must consider that there is a higher risk that individuals may take advantage of 16 and 17 years olds through violence and exploitation for the distribution of drugs, such as county lines etc.

It is also important to note and consider that Local Authorities have parenting responsibility for children / young people who are refugees and asylum seekers, which can present additional challenges in rural areas.

Consideration could be given to more supported accommodation for 16 and 17 years olds to learn appropriate skills for sustaining a tenancy. If this is reformed in the Renting Homes (Wales) Act, there will be a need to look at other elements within the occupation contract in order to protect 16- and 17-year-olds leaving care.

Question 19

The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Please see the response to Question 7 paragraph 2.

Access to accommodation

Question 20

To what extent do you agree or disagree with the short-term proposals to increase the suitability of accommodation? Are there additional immediate actions you believe should be taken for this purpose?

The Council agrees that temporary accommodation should be of a high standard, but there is a need to ensure that the main purpose is to address the individuals' basic needs and that it is not used or designed to be a solution for long-term accommodation. We also agree with the proposal that properties with Category 1 hazards should not be used as temporary accommodation.

The availability of temporary and emergency accommodation is a matter of great concern to the Council. In the absence of an adequate long-term housing stock, there is over-reliance on the use of temporary/emergency accommodation at present. Transitioning to

reduced dependency on this accommodation is a priority and is included in the Council's Rapid Rehousing Transition Plan, but this is with the understanding that we are very reliant on its use in the short and medium term. We therefore ask for consideration and flexibility with these proposals, as implementing the proposals as they stand could mean that we have no way of providing temporary accommodation in some circumstances.

The Council agrees with the proposal to introduce a requirement that personal circumstances must be given consideration in assessing the suitability of accommodation, but expresses concern that the availability of accommodation could make it difficult to fulfil this.

Regarding the proposal to strengthen the legislation to make it clear that placing individuals in overcrowded accommodation should never be permitted when determining the suitability of accommodation – although the Council agrees with the principle, cases might arise where there is no suitable property available at all, for example a family with 9 children.

With regard to the reference towards providing support (Paragraph 510), there will be a need to ensure that the Housing Support Grant is reviewed in a positive manner i.e. a review should not be considered in the context of saving money, but rather as a way of identifying opportunities to invest positively in housing support services.

The Council fully agrees that individuals aged 16 and 17 should not be in any type of accommodation unless support is provided as part of the occupation.

Regarding the proposal that accommodation cannot be deemed suitable unless it is located within reasonable travelling distance of facilities, in a geographically large county, within many rural areas and numerous and persistent demands on the local housing market, securing suitable temporary accommodation based on location is very challenging, therefore although the principle of the proposal is positive, it could lead to a situation where we are not able to use many of our usual accommodation units should this proposal become a requirement.

Data Collection (Paragraph 521) – collecting data is an ever-increasing task that takes up much of the officers' time. If the aim is to profile the availability and stock of temporary accommodation locally and nationally (and the need to report on this to the Government), consideration should also be given to what other aspects of data collection in this field could be simplified / combined / reconciled to reduce the data collection and reporting burden.

Regarding the proposal to ensure that people under 25 are never placed in bed and breakfast – it is important to note that most of the service users who are under 25 are single, and there is a severe shortage of affordable 1-bedroom properties available in Gwynedd. Consequently, many adults aged under 25 are currently being placed in bed and breakfast. We therefore express concern regarding the availability of suitable temporary accommodation and the ability to increase the supply within a short period of time.

We agree with the proposal to include a provision for sites (rather than bricks and mortar accommodation) to be generally considered the most suitable accommodation for an applicant from the travelling community (Gypsy, Roma and Travellers).

Question 21

To what extent do you agree or disagree with the proposals around the allocation of social housing and management of housing waiting lists? What do you believe will be the consequences of these proposals?

Paragraph 572 – we agree with this. Securing the co-operation of registered social landlords with an authority that does not have its own housing stock (like Gwynedd) can prove very challenging at times, despite the Common Housing Allocations Policy being in place. This duty would therefore be of great assistance.

Regarding the unacceptable behaviour test, we agree with this proposal. There is a need to simplify the current regulations and make the process of allocating social housing more needs-based rather than behaviour-based.

We agree with the proposal to grant the power to local authorities to remove people not in housing need from the waiting list.

In terms of providing 'additional preference' to people who are homeless when allocating social housing, we agree with the principle, but feel strongly that this should be proposed and implemented as a power and not as a duty. There could be many unintended consequences if this is implemented as a duty, such as, primarily, depriving many groups of applicants who have a genuine urgent housing need but who are not homeless, for example, families with disabled children who need suitable housing. There is a risk of those who are not homeless, once they have understood how the system works, presenting to the Council through the homelessness route, thus adding even more demands on the service and on other associated areas. Every Local Authority should weigh up the need to implement this as a power based on housing pressures, demand, the supply of properties, availability of temporary properties etc. We feel that the implications of implementing this as a duty are significant and that it would adversely affect our ability to act on behalf of all groups of people.

With regard to providing 'additional preference' to care experienced people who are homeless and those fleeing abuse, as above, we are of the opinion that this should be a power and not a duty.

We also agree with the statutory requirement for a Common Housing Register/Common Allocations Policies.

With regard to introducing the 'deliberate manipulation test', whilst we agree with the principle and the intention, we disagree with its application as drafted. While the proposal makes it clear that deliberate manipulation would not affect the rights of those applying for homelessness assistance, it is not clear how the right to remove 'reasonable preference' would work in practice, and there is a risk that it would increase officers' work load.

Question 22

To what extent do you agree or disagree with the proposal for additional housing options for discharge of the main homelessness duty? What do you foresee as the possible consequences (intended or unintended) of this proposal?

We agree with the proposal to introduce additional housing options for discharging the main homelessness duty, and welcome the proposals within the paper.

Question 23

The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals in relation to access to housing. Are there any costs and benefits we have not accounted for?

Please see the response to Question 7 paragraph 2.

Implementation

Question 24

To what extent do you think the proposals outlined above will support the implementation and enforcement of the proposed reforms?

As we have already outlined in our previous responses, the principle of many of the proposals is to be welcomed, and as a Council we have committed to introducing a Rapid Rehousing Plan that addresses the homelessness crisis. We are glad to see acknowledgement from the Government of the immense pressure there is on the budgets and resources of organisations in the housing sector at present, and in that respect, we feel it is important and vital that the Government recognises the long-term nature of these reforms.

There will be a need to ensure that substantial investment is made to implement some of the proposals (as has already been stated in our response), such as for providing suitable accommodation for all, especially for individuals with complex needs.

Generally, there must be improved information and data capturing overall, to get a fuller and more consistent picture of the situation locally and nationally. For example, it would be useful to obtain a better understanding of what is available to individuals who have presented as homeless repeatedly, to ensure that the cycle is broken.

Question 25

What other levers/functions/mechanisms could be used to hold local housing authorities and other public bodies accountable for their role in achieving homelessness prevention?

The Council is of the opinion that it is important for housing authorities, housing associations, health boards and other public sector organisations to work together to reach the aim of preventing homelessness. It should be ensured that there is collective as well as individual accountability.

We believe that the status of homelessness prevention work and functions should be raised nationally, and on a strategic level to ensure that we are successful in our efforts to retain experienced staff and attract professional staff to the field.

Question 26

The accompanying Regulatory Impact Assessment sets out our early consideration of the costs and benefits of these proposals. Are there any costs and benefits we have not accounted for?

Please see the response to Question 7 paragraph 2.

Question 27

What, in your opinion, would be the likely effects of the proposed reforms in this White Paper on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- Do you think that there are opportunities to promote any positive effects?
- Do you think that there are opportunities to mitigate any adverse effects?

We are disappointed that there is no reference to the Welsh language in this paper, especially considering that individuals and families' housing and homelessness situation can affect the viability of the Welsh language in our communities. As a result, we feel that an opportunity has been missed here.

Without a doubt, it should be ensured that homeless Welsh speakers are given the opportunity to continue living in a society where Welsh is a natural, everyday language, including in rural communities if they so wish, and that children and young people can continue to receive Welsh-medium education. We recommend that this, together with the importance of the Welsh language in individuals and families' lives, should be addressed when creating the Personal Housing Plan.

As the paper recommends adding other groups of people to the list of exemptions to allow for non-familial connections with communities, we believe that careful consideration should be given to the possible repercussions of applying the above exemptions on the Welsh language. Opportunities to alleviate any negative effects on the Welsh language as a result of introducing these exemptions, must be identified. If homeless non-Welsh speakers are placed in a naturally Welsh society, consideration should be given to ways of

assimilating them in the Welsh society by working with community groups, developing a relationship with the language and increasing opportunities to use the language.

It should also be ensured that the language used to communicate with people is clear and easily understood.

Question 28

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:

Overall, as a Council, we agree with the direction and proposals of the White Paper and are supportive of the Government's aspiration to try to identify and alleviate the factors that are responsible for the negative cycles associated with homelessness through a preventative approach that is based on partnership arrangements. The particular recognition within the proposals that homelessness must be a priority and responsibility for several public services is certainly to be welcomed.

However, concerns exist about the resources required to achieve these proposals, as well as the timescale for introducing the changes. The entire sector is already facing a challenge in responding to the increasing demand, the complexity of cases and the lack of finance there is available to operate effectively. If the Government wants to ensure that these proposals will lead to a "once in a generation" change in homelessness, then sufficient financial sources must be identified for the long term. The recent decision not to increase the level of Housing Support Grant is likely to cause a strain on services and providers, and is likely to hinder any effort to significantly increase preventative measures as proposed in the White Paper. Alongside the preventative work, there will be a need to continue investing substantially through the Social Housing Grant if we want to see the construction of social housing speeding up in order to facilitate the process of ensuring increased options for offering long-term accommodation to individuals.

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WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Consultation on the White Paper on Ending Homelessness in Wales

October 2023

CONTENTS

Section 1. What action is the Welsh Government considering and why?	3
Section 8. Conclusion	6
Section 9. Declaration.....	11
Full Impact Assessments	12
A. Children's Rights Impact Assessment.....	12
B. Equality Impact Assessment	20
C. Welsh Language Impact Assessment	57

SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

Context

The White Paper, published alongside this IIA, sets out a range of proposals for changes to law, to end homelessness in Wales.

Prior to considering the proposals in this White Paper it may be useful for the reader to familiarise themselves with part 2 of the [Housing \(Wales\) Act 2014 \(HWA 2014\)](#). This Act provides the current legislative framework which governs homelessness services and is referred to throughout. Many of the proposals within this document relate to reform of this piece of legislation.

At the start of the Covid-19 pandemic, the Welsh Government put additional funding and guidance in place around provision of housing or temporary accommodation for local authorities to ensure that no-one was left without suitable accommodation and support. [The Homelessness Monitor: Wales 2021 report](#) funded by Crisis highlighted homelessness as a high priority in Wales before the pandemic, with an independent Homelessness Action Group developing the basis of a high-level Action Plan. However, the ‘no one left out’ approach implemented during the pandemic has brought the importance of addressing homelessness into sharper focus.

[The Ending Homelessness in Wales High Level Action Plan 2021 – 2026](#) outlines that the housing crisis created by the pandemic has provided a unique opportunity to make radical changes to homelessness prevention systems and processes in Wales.

The proposals set out in this White Paper are based on recommendations and advice provided to the Welsh Government by an [Independent Expert Review Panel](#), convened by the Minister for Climate Change to [review existing legislation on ending homelessness in Wales](#), and to provide specific recommendations for reform. The proposed reforms are rooted in the lived experience of homelessness and, in addition to this, views expressed during engagement events with local authorities, housing associations, third sector organisations have been taken into consideration.

A summary of the proposed reforms

The White Paper will first set out the background and policy context for the proposed reforms before outlining our proposals under the following themes:

- Reform of existing core homelessness legislation.
- The role of the Welsh public service in preventing homelessness.
- Targeted proposals to prevent homelessness for those disproportionately affected.
- Access to housing.
- Implementation.

Impact

This is a draft Integrated Impact Assessment (IIA) of the proposals contained in the White Paper. The draft IIA is a developing document, and we are seeking additional and alternative evidence to help inform our proposals. A revised IIA will be published alongside any future Bill and revised in line with the evolving proposals.

The most significant positive impacts of our proposals include:

- The risk of homelessness is prevented at the earliest possible stage and responsibility for identification and prevention is shared across the Welsh public service.
- The local housing authority offer a person centred, trauma informed service that is led by the needs of the client, wherever possible.
- The system will be easier to access and, for those who need it, will offer more co-ordinated, multi-agency support to meet a range of support needs.
- Standards of temporary accommodation on offer will be improved and further improvement will take place over time.
- We will maximise use of social housing to end homelessness and utilise a range of other options.
- Targeted actions will be taken to improve the experience of those most likely to be affected by homelessness.

Long term

These proposals form part of a long-term transformation process to the homelessness and housing system, as set out in the [Programme for Government](#) and [Cooperation Agreement](#). The reforms will support the Welsh Government long term policy aim of Rapid Rehousing (those who are homeless are able to obtain long term housing quickly, increase their own self-sufficiency, and stay housed) and sustain the significant practice change achieved in response to the Coronavirus pandemic.

Prevention

These proposals will support the breaking of negative cycles and identification and mitigation of underlying causes of homelessness through a preventative, partnership working approach. [The Strategy for Preventing and Ending Homelessness \(2019\)](#), states that the Welsh Government's vision is a Wales where we work together to prevent homelessness and to ensure that it is rare, brief, and un-repeated. As pledged in the updated [Welsh Programme for Government 2021-26](#), the proposed reforms aim to "fundamentally reform homelessness services to focus on prevention and rapid rehousing". This will involve identifying those at risk of homelessness and referring to relevant support services for meaningful intervention before cases reach crisis point.

Collaboration

The Welsh Government's Ending Homelessness Action Plan recognises that homelessness is a cross-sector priority and issues relevant to homelessness require an 'all public services' response. We will work with local authorities to introduce a multi-agency response to provide sufficient support services, particularly for those with complex needs.

Involvement

Section 5 of [The Well-being of Future Generations \(Wales\) Act 2015](#) indicates that a public body must take account of the importance of involving people who reflect the diversity of the population of Wales in making decisions that interest or impact them. Engagement work with those who have lived experience of homelessness has informed the proposed reforms. As the homeless population of Wales is diverse and complex, this engagement has included consideration of the intersection between homelessness and the protected characteristics outlined in [the Equality Act \(2010\)](#).

Integration

The White Paper is grounded in the lived experience of homelessness. Funded by the Welsh Government, Cymorth Cymru have worked with over 300 people who have experienced homelessness, including those living in temporary accommodation, young people, care leavers, survivors of abuse and people in prison. Furthermore, to ensure the voices and experiences of people with protected characteristics informed this work, Tai Pawb were commissioned to undertake focussed engagement work with asylum seekers, refugees, disabled people, Black, Asian and Minority Ethnic people, Gypsies and Travellers, older people and LGBTQ+ people.

We have also undertaken a range of stakeholder engagement work with the third sector, local authorities and Registered Social Landlord (RSLs) and specialist stakeholder engagement on a range of subjects including homelessness and violence against women and domestic abuse and sexual violence, the role of health and social care, mental health and substance use, disability and the Criminal Justice System.

Cost and Savings

A draft Regulatory Impact Assessment (RIA) is published alongside the White Paper, together with this draft IIA. The draft RIA sets out an initial cost and benefit assessment of the options to proposals for changes to law, to end homelessness in Wales.

Mechanism

The proposal is to bring forward primary legislation. A Regulatory Impact Assessment will be completed alongside the Bill.

SECTION 8. CONCLUSION

8.1 How have people most likely to be affected by the proposal been involved in developing it?

The White Paper is rooted in the lived experience of homelessness with over 300 people who have experienced or been at risk of homelessness contributing their insights and expertise to their development.¹

Cymorth Cymru engaged with people living across Wales, including those living in temporary accommodation, young people, care leavers, survivors of abuse and people in prison across Wales to provide evidence about the reality of being homeless in Wales.² To ensure that any intersection between homelessness alongside protected characteristics was identified early, Tai Pawb were commissioned to engage with people with protected characteristics including asylum seekers and refugees, disabled people, Black, Asian and Minority Ethnic people, Gypsies and Travellers, older people and LGBTQ+ people³

We also sought to engage with dependent children under 16 in partnership with Children in Wales. Unfortunately, this project was unable to engage directly with children and young people due to sensitivity and ethical issues. Relevant stakeholders were engaged and have informed the White Paper. We hope to commission additional work through the consultation period to engage children and young people.

The following stakeholders have also been engaged: Regional Partnership Boards, The Commission on Welsh speaking communities, NHS strategic planning, Public Health Wales, the Welsh Government Health inclusion group, RSLs, local authorities, the third sector, the Ending Homelessness National Advisory Board and Childrens Commissioning Consortium Cymru.

Engagement with people with lived experience of homelessness will continue, alongside wider stakeholder engagement.

¹ [Experts by Experience \(cymorthexperts.wales\)](https://cymorthexperts.wales)

² [Experts by Experience \(cymorthexperts.wales\)](https://cymorthexperts.wales)

³ [Experiences-of-homelessness-Final-Version-PDF.pdf \(taipawb.org\)](https://taipawb.org/experiences-of-homelessness-final-version-pdf)

8.2 What are the most significant impacts, positive and negative?

The reforms also provide an opportunity to generate significant savings for both local housing authorities and their public service partners over the longer term. The reforms will formalise the internationally recognised Rapid Rehousing approach and strengthen evidence-based practice, shown to be most effective in reducing core homelessness. This practice includes maximising prevention efforts, expanding the responsibility for homelessness to the wider public service, increasing social housing allocations to homeless households and providing tenancy support for those who are most vulnerable to repeat homelessness.

The proposed reforms laid out in the White Paper aim to establish a more trauma informed, person-centred approach to the delivery of homelessness services and contribute towards the Welsh Government's goal of ensuring homelessness is rare, brief and unrepeatable. In research involving people with lived experience of homelessness and accessing homelessness services, the following common challenges were identified:

- Difficulty in having situations understood or resolved.
- Repetition/reinforcement of past trauma when accessing different services.
- Barriers to self-advocating and/or providing evidence.
- Communication and join up issues between housing and wider public services.
- The need for engagement from external agencies.

One of the main impacts of the proposed reforms is that, through the implementation of personal housing plans, services should become more personalised and allow individuals to have more choice and input in their cases. This should remove some of the aforementioned barriers for individuals around self-advocating and/or providing evidence that could improve their situation. The use of personal housing plans will also promote a more collaborative approach between services and service users, encouraging service users to engage more in their cases and is in line with the Welsh Government's wellbeing objective to involve people.

In addition to this, an extended prevention duty from 56 days to 6 months or when a Possession Notice is received will allow services to strengthen their work around the prevention of homelessness. Under this proposed reform homeless service staff will be able to act sooner to take reasonable steps to secure accommodation or ensure that accommodation does not cease to be available. This will help towards creating a more resilient Wales where housing services are better positioned to address the impacts of crisis situations.

Extending duties to wider public services e.g., health, substance abuse, education, social services etc. should result in improved join up and create a person-centred system where service users can be referred to the correct services to ensure that their

individual needs are managed appropriately. Situations that lead to homelessness or risk of homelessness can also be better addressed through a multidisciplinary approach as homelessness is not just a housing issue and other factors are often involved. Identifying signifiers of future risk of homelessness at an earlier point will allow meaningful intervention to take place earlier. This should cause instances of repeat presentation to local authority housing services to become less frequent as individuals will be receiving the support that they need to sustain accommodation.

Introducing targeted preventative measures for disproportionately affected groups will help to make support from housing and homelessness services more accessible. Proposed reforms that could contribute towards this are the removal of the “priority need” and “intentionality” test and the amendment of the “local connection” test to better allow consideration of protected characteristics and the circumstances of the applicant. The removal of “priority need” and “intentionality” tests will encourage a more trauma informed response to homelessness that does not challenge people to prove their level of need and does not determine people as being deserving or undeserving of help.

The Welsh Government also aims to improve access to housing by proposing the removal of those with no housing need from social housing registers. Although the positive impact of this would be that people with housing need are prioritised and may experience shorter wait times for social housing offers, there may also be negative implications. It is possible that local authority housing staff may face push back from local politicians due to some communities having an interest in retaining people who have lived in the area for a long period of time. Additionally, this change may not have as significant an impact as intended if the correct type of housing stock is not available.

8.3 In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**
- **avoid, reduce or mitigate any negative impacts?**

The proposals set out in the White Paper contribute to a number of the seven well-being goals prescribed in section 4 of the Well-being of Future Generations (Wales) Act 2015, as summarised in the list below:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

The reforms set out in the White Paper offer the opportunity to contribute significantly to a fairer, healthier and more equal Wales, alongside broader a contribution to each of the seven well-being goals and the Welsh Government's well-being objectives, by addressing the inequality of outcome and other difficulties faced by some of those experiencing or at risk of homelessness.

The proposed reforms will assist housing services in implementing a more preventative, trauma informed and person-centred approach. The objectives of this are to maximise choice for service users and improve accessibility of services for those with complex needs. Focusing on the needs of the person first will help to tackle barriers to having specific needs understood. This will contribute towards the commitment of creating a more equal Wales and a more prosperous Wales as it aims to address the difficulties faced by those with protected characteristics, complex needs and past trauma with the goal of ensuring that they are able to achieve equality of opportunity for the support they need.

Poor mental and/or physical health is a notable cause of homelessness, with 33% of homeless people in Wales reporting their current homelessness was caused by a health problem.⁴ The impacts of experiencing homelessness on physical and mental health can also be significant and life limiting. Homeless people have higher mortality ratios compared to the general population and are twice as likely to die as the general population from heart attacks and chronic heart disease.⁵ The average age of death registered among an estimated 741 deaths of homeless people in England and Wales in 2021 was 46 for men and 42 for women, around 30 years lower than the general population. In relation to mental health, one of the most significant causes of death registered among homeless people aged 20 to 49 years was intentional self-harm.⁶ Additionally, a study by Public Health Wales found that developing maladaptive coping behaviours in teenage years, or earlier, could lead to homelessness in later life.⁷

Improving provision of safe, stable environments to live in and multidisciplinary support from public services can help to mitigate negative impacts of homelessness on physical and mental health and manage underlying causes of homelessness related to health. Addressing the health issues associated with homelessness will help us to work towards the well-being goal of a healthier Wales.

⁴ Watson I, MacKenzie F, Woodfine L and Azam S. (2019). [Making a Difference. Housing and Health: A Case for Investment](#). Cardiff, Public Health Wales.

⁵ Watson I, MacKenzie F, Woodfine L and Azam S. (2019). [Making a Difference. Housing and Health: A Case for Investment](#). Cardiff, Public Health Wales.

⁶ [Deaths of homeless people in England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

⁷ Watson I, MacKenzie F, Woodfine L and Azam S. (2019). [Making a Difference. Housing and Health: A Case for Investment](#). Cardiff, Public Health Wales.

Rapid Rehousing and maximising prevention efforts are among the most effective policies for reducing core homelessness.⁸ Moving towards a system that incorporates these two elements among others will help to create a Wales that is more resilient.

A cohesive community is defined as one that is able to adapt to change, focused on the well-being of the people who live there with access to key services and where people can do the things that matter to them⁹. The Welsh Government's commitment to ending homelessness as well as proposals that aim to create a shift towards viewing homelessness as more than just a housing issue will challenge public perspectives around homelessness, promoting more positive relationships and empathy within communities.

In 2020 the UN reported that 1.6 billion people worldwide lived in inadequate housing conditions, with about 15 million forcefully evicted every year, indicating that homelessness is a global human rights issue.¹⁰ The UN highlights preventing and eliminating homelessness as a “minimum core obligation [of States] to ensure the satisfaction of, at the very least, minimum essential levels of each of the rights” under the **International Covenant on Economic Social and Cultural Rights**.¹¹ By reforming the current legislation to allow for earlier preventative measures to be applied in cases of homelessness, the Welsh Government will be working in accordance with this and demonstrating global leadership in how Wales responds to the issue of homelessness.

8.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

Following the launch of the White Paper, the Homelessness Prevention Legislation Team will engage in a consultation period. All responses to the consultation will be reviewed and used to refine the proposals further as part of the process to develop a range of reforms including legislation in this area. Revised versions of the IIA and RIA will be published to accompany any future Bill. We will conduct regular engagement with stakeholders to discuss emerging issues.

We will develop an implementation plan for the proposals during the legislative development phase, with stakeholders and at its conclusion. This will include monitoring and evaluating impacts.

⁸ [The Homelessness Monitor: Wales 2021 | Crisis | Together we will end homelessness](#)

⁹ [Cohesive-Wales-Topic-1.pdf \(futuregenerations.wales\)](#)

¹⁰ [First-ever United Nations Resolution on Homelessness | DISD](#)

¹¹ [Homelessness and human rights | OHCHR](#)

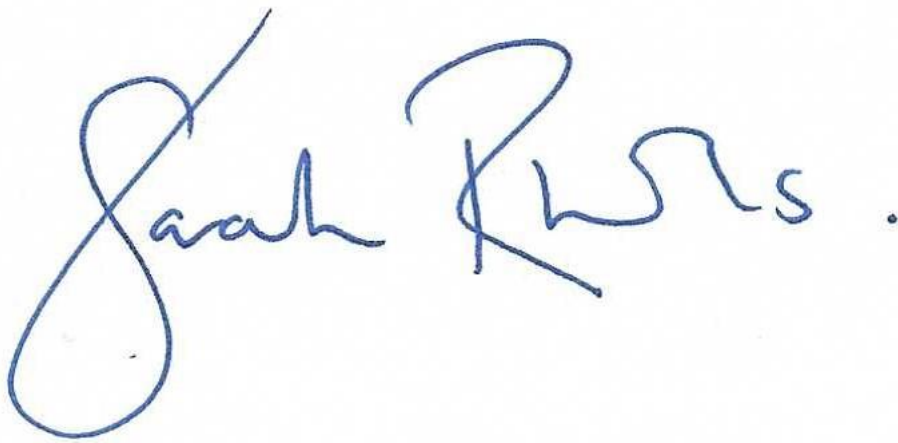
SECTION 9. DECLARATION

Declaration

I am satisfied that the impact of the proposed action has been adequately assessed and recorded.

Name of Senior Responsible Officer / Deputy Director:

Sarah Rhodes

A handwritten signature in blue ink, reading "Sarah Rhodes." The signature is written in a cursive style with a large loop for the 'S' and a period at the end.

Department: Housing Policy

Date: 2 October 2023

A. CHILDREN'S RIGHTS IMPACT ASSESSMENT

1. Policy objectives

1.1. The White Paper is a step on the journey to meeting a [Programme for Government](#) commitment to “*Reform housing law and implement the Homelessness Action Group’s recommendation to fundamentally reform homelessness services to focus on prevention and rapid rehousing*”. It draws on [The Strategy for Preventing and Ending Homelessness \(2019\)](#), the [Ending Homelessness in Wales High Level Action Plan 2021-2026](#), the report of the Expert Review Panel and several pieces of research which are set out in the sections below.

1.2. Under [Part 2 of the Housing \(Wales\) Act 2014](#), people residing with dependent children, young people aged 16 to 17 and young people aged 18-20 who were looked after or fostered at any time while under the age of 18 or who are at particular risk of sexual or financial exploitation are categorised as being in priority need for support to access housing. The White Paper proposes changes to the 2014 Act which aim to fundamentally reform homelessness services to focus on prevention, early intervention and Rapid Rehousing.

1.3. Welsh Government’s vision is to create a Wales where the Welsh public services work together to prevent homelessness and, where it cannot be prevented, to ensure that the experience of homelessness is rare, brief, and unrepeatable. To deliver this and following a public consultation on the White Paper, a Bill will be developed. The intention of the Paper’s proposals is to benefit people of all ages on a prevention and early intervention basis via the enabling of a one Welsh public service, person-centred and trauma-informed system. A whole system, whole person approach will see public sector services working in partnership with housing services to identify those at increased risk of homelessness at earlier stages in order to address individual needs and, where possible, prevent homelessness. Early intervention will help to ensure that children and young people have access to the support they need and, where possible, do not reach crisis stage.

1.4. There are many elements to the White Paper including work to ensure that children and young people are able to live in safe, stable environments, which will have a positive impact on their health, growth, and development. There are specific proposals in relation to:

- clarifying responsibility for duties owed to 16- and 17-year-olds who are homeless or threatened with homelessness
- ending use of the homelessness system as a route out of care
- extending the time period in which individuals can be threatened with homelessness from 56 days to six months or where a possession notice has been served thus increasing time to undertake prevention activity
- the exemption of care experienced young people and families where domestic abuse and other forms of violence and exploitation have been experienced, from the “*local connection*” test.

1.5. The White Paper and resulting legislation will also cover standards and allocation of social housing, with aims to improve the quality and range of temporary accommodation and access to Rapid Rehousing options.

2. Gathering evidence and engaging with children and young people

2.1. Several pieces of work have been carried out of relevance to the proposals in the White Paper. Some of these are referenced below.

2.2. Children in Wales’ report on the findings of the Youth Homelessness (under 16) Call to Evidence event in December 2022, outlined sensitivities in reaching out to this group of young people, such as retraumatising them through recounting their experiences. Evidence submitted included Llamau’s [Upstream Cymru](#) report (2022) which revealed that a majority of local authorities found it difficult to undertake research with 11-16 year olds (the age group covered by Llamau’s Upstream Cymru programme) and were unable to provide linked data between education and homelessness. Also, Barnardo’s [work](#) on homelessness amongst care experienced young people which revealed those living independently under the age of 18 are some of the most vulnerable young people in society. A major finding from the 2022 event was the lack of existing research and participatory work around homelessness with this group of young people. As a result, we will ensure dedicated arrangements with this cohort are made when we design our White Paper consultation programme.

2.3. Cymorth Cymru’s [Experts by Experience](#) (2023) project, the End Youth Homelessness Cymru, [Don’t Let Me Fall Through the Cracks](#) (2020) report and the Public Health Wales report [Preventing Homelessness in Care Experienced Individuals](#) (2020) all highlighted considerable barriers to accessing housing for young people. In addition, End Youth Homelessness Cymru’s 2020 report [Out on](#)

the Streets LGBTQ+ Youth Homelessness in Wales , AKTs 2015 research '*LGBT Youth Homelessness: A UK National Scoping of Cause, Prevalence, Response and Outcome (2015)*'.and Tai Pawb's 2023 research '*The experiences of homelessness of people with protected characteristics in Wales*' looked at housing and homelessness challenges relating to LGBTQ+ young people and the other protected characteristics. Throughout the process of finding help to secure housing and trying to avoid homelessness, the following issues were raised:

- low confidence in approaching local authority housing services
- having to repeat experiences to various sector professionals and feeling judged and stigmatised and not supported by the system
- the stretched availability of resources in terms of staffing and funding
- the lack of support including signposting from other parts of the public sector: social services, mental health services/CAMHS, education and youth services
- poor communications between the different parts of the public sector and as a result, with children and young people
- low understanding of the specific needs of LGBTQ+ young people who are shown to be disproportionately represented in the homelessness data with many hidden from the view of public services. Low understanding of gender identity
- people with no recourse to public funds (NRPF) and the complexity of legislation, policy and guidance governing their rights and entitlements at the UK and Wales levels
- the stretched availability of suitable temporary accommodation and the use of places such as night shelters
- conflicts between different parts of the public sector over responsibilities
- the unaffordability of permanent housing

2.4. A major finding was that young people often felt their concerns and needs were not taken seriously and that more could be done to prevent homelessness whether or not the children and young people were part of family groups.

2.5. Related to this, the Wales Centre for Public Policy (WCPP) report on [preventing youth homelessness](#) (2018) noted that actions to prevent homelessness among children and young people could be strengthened, supported, enforced, and defended through legislation and social policy. The current emergency-focused response to homelessness was found to be failing young people as opportunities to intervene early are being missed, and services often fail to transition young people out of homelessness quickly. This could potentially be a result of the current 'silo'-organised bureaucracy involved in

these processes, which do not facilitate a whole system response to meeting young people's needs. The same review recommends that services engage with young people early and often in planning processes that address their housing stability and necessary wrap-around support, the removal of time-consuming practices would help in simplifying the system so that more meaningful engagement with service users can take place.

2.6. Shelter's report; [The impact of homelessness and bad housing on children's education: A view from the classroom](#) and the Welsh Government report : [Absence from school amongst children living in homeless household](#) have also informed the White Paper in relation to the role of education.

3. Analysing the evidence and assessing the impact

3.1. One of the main aims of the White Paper is to shift the homelessness system towards a stronger emphasis on prevention and early intervention. As highlighted in the aforementioned research, children and young people feel this is as an area that could be improved on. The research has directly informed the Paper's proposal to extend the currently prescribed length of time to undertake prevention activity from the current 56 days to six months or where a possession notice has been served. A positive effect of this on children and young people is that it will reduce their risk of becoming homeless while preventative actions are taken.

3.2. The proposals aim to remove "priority need" and "intentionality" tests and amend the "local connection" test to better allow consideration of the circumstances of the applicant. The aim of this is to develop a more person-centred and trauma-informed approach to delivering homelessness and housing services that does not challenge people to prove their level of need and does not determine people as being deserving or undeserving of help. This would also have a particularly positive impact on young people over 18, who would no longer need to prove that they are in the priority need category for young people aged 18-20 who were looked after or fostered at any time while under the age of 18 or who are at particular risk of sexual or financial exploitation.

3.3. The White Paper also sets out the aim to explore further, through consultation, whether the Renting Homes (Wales) Act 2016 should be amended to allow 16-17 year olds to be occupation contract-holders, which would broaden the accommodation options available to this group.

3.4. The proposals aim to improve collaborative working and communication between the different public sector services that have a role to play in all people (including children and young people's) lives. The aim is to make homelessness

a shared responsibility across public services, that improved account is taken of the wider life journey including, for example, schools and colleges, mental and physical health and wellbeing, care-experience, substance abuse, interactions with the youth justice system etc. If more parts of the public sector work together then the risks of homelessness can be identified at earlier points.

3.5. The proposals aim to provide greater clarity around where duties to support children and young people rest, with the aim that fewer children and young people will feel that there is a “battle” between services over which part of the public service is responsible for them and at what stage.

3.6. The proposals aim to make Housing Services more accessible to all, particularly individuals with protected characteristics such as those who are young and old, LGBTQ+, Black, Asian and Minority Ethnic people, disabled people etc. A more person-centred and trauma-informed approach necessitates the simplification of processes within the whole system, more frequent communication and improving the accessibility of language used when communicating with all people including children and young people.

3.7. The proposals will also consider allocations arrangements and the standard of temporary accommodation and housing, with the aim of moving towards a process of Rapid Rehousing into permanent accommodation in line with [already published guidance](#). The aim here is to introduce a system where people can access settled accommodation quickly and limit disruptive moves and long stays in temporary accommodation.

4. What participatory work with children and young people have you used to inform your policy? If you have not engaged with children and young people, please explain why.¹²

4.1. Participatory work with children was attempted as part of our policy development, in partnership with Children in Wales. Unfortunately, Children in Wales were unable to identify anyone to participate in the work. We are working with research colleagues to identify alternative options to undertake such engagement throughout the consultation period.

4.2. All research referenced here has been used to inform our policy in relation to children and young people, specifically in respect of 16 to 17-year-olds.

¹² Article 12 of the UNCRC stipulates that children have a right to express their views, particularly when adults are making decisions that affect them, and to have their opinions taken into account.

4.3. WCPP's 2018 report identified a gap in knowledge related to structural preventative activities. Further research and concept building is needed to better understand the unique effects of particular kinds of structural interventions (e.g., poverty reduction strategies and homelessness prevention legislation) on young people who are homeless or at risk of becoming homeless.

4.4. In our White Paper consultation activities, we will consider WCPP's recommendation above as part of our work to engage with children and young people. We will provide further detail on the arrangements we make to work with these cohorts including working with the CRIA team to identify suitable Third sector partners we can work with, especially those who support these cohorts in relation to the protected characteristics.

5. Analysing the evidence and assessing the impact

5.1. In order to mitigate and/or reduce any negative effects, we will review the CRIA and other impact assessments throughout our work as well as any new research, so that we remain aware of the issues and challenges to the rights of children and young people that could arise. This will ensure that the work being undertaken complies with The Rights of Children and Young Persons (Wales) Measure 2011 in giving due regard to the United Nations Convention on the Rights of the Child (UNCRC) and its Optional Protocols.

5.2. Additionally, the Homelessness Prevention Legislation Team have drafted a Risks and Issues Log that will be updated regularly to consider new risks that may arise as barriers to or results of ongoing work. This includes outlining short-term and long-term measures to manage or mitigate risks and negative effects of reforms to legislation.

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Article 3 (best interests of the child) Article 9 (separation from parents) Article 10 (family reunification) Article 12 (respect for the views of the child) Article 18 (parental responsibilities and state assistance) Article 19 (protection from violence, abuse and neglect) Article 20 (children unable to live with their family) Article 23 (children with a disability) Article 24 (health and health services) Article 34 (sexual exploitation) Article 35 (abduction, sale and trafficking) Article 39 (recovery from trauma and reintegration)	X		Being able to live in a stable, secure home is central to every child and young person's best interests and development. The proposals aim to introduce a one Welsh public service, whole system, person-centred and trauma-informed approach to preventing homelessness which aims to improve the experience of accessing and retaining suitable housing. Creating this approach to reducing the risk of homelessness will give children and young people a greater range of opportunities with a wider range of public services partners to communicate their needs. The introduction of related streamlined processes which improve the accessibility of services in a more individualised way, will help children and young people feel their views are taken more seriously than under the current system. It is the clear intention of the proposals in the Paper that all of the referenced Articles of the Convention are at least met and that children and young people will be supported to experience these rights and entitlements.

6. Communicating with Children and Young People

6.1. Engagement with children and young people will be commissioned through Third Sector organisations. Child-friendly versions of our work will also be produced. Any reports resulting from engagement with and research involving children and young people will be shared with them once they are published.

7. Monitoring and Review

7.1. The Homelessness Prevention Legislation team have drafted an ongoing risks and issues log, which will be updated throughout the course of the work taking place. This will inform changes that need to be made to our approach to the project or project documents in order to mitigate risks. In addition to this, more information around children's and young people's experiences of homelessness and the how the proposals will impact them may become available to us during the timeframe of the work to deliver the White Paper including the consultation process. We will review and update this CRIA document to reflect any emerging information or changes.

B. EQUALITY IMPACT ASSESSMENT

1. Describe and explain the impact of the proposal on people with protected characteristics as described in the Equality Act 2010.

1.1. Homelessness is a complex issue with a range of causes and consequences. Those who experience homelessness are not a homogenous group and their backgrounds and experiences will vary. However, we know that the risk of homelessness can be exacerbated by broader external factors, including the current cost of living crisis.

1.2. We also know that the cost-of-living crisis is likely to have a disproportionate and cumulative impact on some protected groups. The proposals set out in the White Paper will promote equality through improving access to housing services and working to mitigate discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.

1.3. The White Paper on ending homelessness in Wales sets out a range of proposals for changes to policy and the law to ensure homelessness in Wales is rare, brief and unrepeatable. The proposals set out in the White Paper are based on recommendations and advice provided to the Welsh Government by an [Independent Expert Review Panel](#), convened by the Minister for Climate Change, to review existing legislation and to provide specific recommendations for reform.

1.4. The panel has considered evidence from people with lived experience of homelessness and experts in homelessness practice, policy and research. Funded by Welsh Government, Cymorth Cymru worked with over 300 people who have experienced homelessness, including those living in temporary accommodation, young people, care leavers, survivors of abuse and people in prison.

1.5. Furthermore, to ensure the voices and experiences of people with protected characteristics informed this work, Tai Pawb were commissioned to undertake focussed engagement with asylum seekers, refugees, disabled people, Black, Asian and Minority Ethnic people, Gypsies, Roma and Travellers, older people and LGBTQ+ people.¹³ Tai Pawb's [report](#) on 'The experiences of homelessness of people with protected characteristics in Wales' (2023) should be considered alongside this Impact Assessment.

¹³ [Experiences-of-homelessness-Final-Version-PDF.pdf \(taipawb.org\)](#)

1.6. The proposals within the White Paper are rooted in this engagement work and several are direct responses to the views and experiences of the individuals we have worked with.

1.7. The proposals within the White Paper sustain the significant practice change achieved in response to the Coronavirus pandemic and support the delivery of one or more of our key working principles:

- Homelessness should be rare, brief and unrepeatable.
- Homelessness service delivery should be trauma informed and person-centred.
- Those who are homeless should be able to obtain long term housing quickly, increase their own self-sufficiency, and stay housed (Rapid Rehousing).
- Preventing homelessness is the responsibility of the entire Welsh public service.

1.8. These broad principles support a reformed homelessness system that is designed to be person centred and needs led. Such an approach will provide broad positive impacts for anyone applying for homelessness and housing assistance with particular emphasis on individuals experiencing vulnerabilities linked to unmet support needs. These benefits include:

Earlier Intervention and prevention

1.9. The White Paper outlines a range of proposed reforms including changes to core homelessness legislation that create a stronger emphasis on prevention of homelessness. Building on the cultural shift prompted by the Housing (Wales) Act 2014, the reforms aim to support earlier intervention with individuals at risk and better address the wide-ranging causes and consequences of homelessness.

Removing barriers for all applicants

1.10. The White Paper proposes changes to the homelessness system to remove certain “tests” which determine whether particular duties are owed by a local authority under the current legislation. These tests relate to “priority need” and whether a person is “intentionally homeless”. Amendments will also be made to add flexibility to the test which determines if someone has a “local connection” to the area in which they are making their application. These tests are not person centred and have led to vulnerable people being excluded from homelessness support and contributed to rough sleeping. Our proposals to

amend these tests directly respond to feedback from service users, particularly those who have experienced homelessness alongside protected characteristics. Should proposals to abolish the priority need and intentionality tests be taken forward into future legislation, the White Paper proposes that the relief duty provided by section 73 of the Housing (Wales) Act 2014 is also removed, as the distinction between those with priority need and those without will no longer apply.

Wider responsibility

1.11. The White Paper proposes duties on the wider public service; to identify homelessness, refer individuals to the local housing authority and to extend duty to cooperate to additional public service bodies. These proposed duties will more effectively identify risks of homelessness for all but we believe they will provide particular benefits for those disproportionately impacted by homeless and those who experience homelessness alongside multiple support needs.

Targeted prevention

1.12. The White Paper contains several proposals which seek to mitigate the disproportionate risk of homelessness faced by particular groups. These proposals are strongly based on our equality impact assessment and the feedback of people with lived experience of homelessness, including those with protected characteristics.

1.13. Through the implementation of the proposals laid out in the White Paper, it is intended that housing services and wider public services will work more effectively together to address issues and complex needs that often present barriers or difficulties such as general and mental health, substance abuse, family and partnership relationship breakdowns, experiences of domestic abuse etc.

1.14. The proposed reforms are broad and complex and form part of a long-term transformation strategy to address the pressures in the housing system. Implementation of the reforms will take some time to deliver and local authorities, RSLs and wider partners will need time to prepare for the reforms, including delivery of training, delivery of IT and processes and system set up.

1.15. Also, there are significant issues around housing supply, which will not be addressed by the proposed reforms. The success of the reform is dependent on increased supply and, in particular development of accommodation for specific groups, e.g. single people and large families.

1.16. Below we set out our assessment of evidence in relation to the experience of homelessness alongside the protected characteristics set out in the Equality Act 2010. However, it should be noted that throughout the development of the White Paper we have noted issues with data quality and evidence related to homelessness and wider protected characteristics and, seeking improvements to this is a proposal within the White Paper.

2. Record of Impacts by protected characteristic:

Age

Children and young people up to the age of 18

2.1. UK-wide research in 2014 found that 20% of 16-25 year olds had sofa surfed during the last year, with 16% having done so for more than a week and 4% over three months. It also found that 26% had slept in unsafe places such as cars, night busses or on the streets.¹⁴ Centre point indicates that 129,000 16-24 year olds were homeless or at risk of homelessness in the UK in 2021-2022.¹⁵ Crisis' 2014 report, *'Nations apart? Experiences of single homelessness people across Great Britain'* found that homelessness generally began at a young age, with 50% of respondents first becoming homeless aged 20 or younger.¹⁶ 41% left their accommodation during their first experience of homelessness due to a non-violent dispute. It also found that 1 in 4 people aged under 21 had never lived in permanent housing. The report also highlights that the earlier a person becomes homeless, the greater the likelihood that they will have 5 or more experiences of homelessness.

2.2. In Wales, in 2021/22, 444 16–17-year-olds and 5,519 18-24 year olds approached local authorities for help.¹⁷ In Wales, as of June 2023 3,346 dependent children aged under 16 were in temporary accommodation.¹⁸

2.3. Crisis and Cardiff University's Nations apart: Experiences of single homelessness people across Great Britain found that 24% of homeless people had been in local authority care.¹⁹

2.4. The 2015 study of the Experiences of Young Homeless People (SEYHoPe) found that 50% of young people interviewed felt they had experienced some form of abuse. Young homeless people were 7 times more likely to have experienced emotional abuse and 3 times more likely to have experienced neglect.

¹⁴ Cambridge Centre for Housing and Planning Research, [Estimating the Scale of Youth Homelessness in the UK](#), Final Report, 2015.

¹⁵ [The Youth Homelessness Databank | Centrepont | Centrepont](#)

¹⁶ [crisis_nations_apart_2014.pdf](#)

¹⁷ [Households for which assistance has been provided by outcome, age and gender \(gov.wales\)](#)

¹⁸ [Homelessness accommodation provision and rough sleeping: June 2023 | GOV.WALES](#)

¹⁹ [crisis_nations_apart_2014.pdf](#)

2.5. 32% had been expelled from at least 1 school and 55% had at least 1 out of school suspension. It was also found that 3 in 5 were currently using 1 or more drugs. 9 in 10 met the criteria for at least 1 psychiatric disorder, despite this, only 35% of young people were accessing services.²⁰

2.6. A recent report commissioned by the Welsh Parliament Children, Young People and Education Committee highlighted the link between experiencing homelessness and being a care leaver, stating that 1 in 4 care leavers experience homelessness when they turn 18 (Senedd Commission, 2023, p.51). The report highlighted that local authorities that give priority to housing people with a local connection may have a negative impact on care experienced young people who may have moved around a lot due to no fault of their own.²¹ End Youth Homelessness Cymru's Don't Let Me Fall Through the Cracks report also highlights that local connection can be a barrier as care experienced young people form relationships in other local authorities, however local connection rules may mean they are unable to live in an area with that personal connection.

2.7. The report mentions that of the 27 care experienced young people they spoke to, 15 felt that a family or relationship breakdown contributed to them experiencing youth homelessness. If young care experienced people aren't able to be accommodated in an area due to local connection this may mean they may not have their support network around them. However, the report mentions that some young people they spoke to believed that living with others who shared their experience could be a positive option for them, but it was acknowledged this may not work for all.²² This evidence has directly informed our proposals to add additional groups of people to the list of exemptions from the local connection test to allow for non-familial connections with communities and for targeted prevention to mitigate the risks of homelessness for children and young people and care experienced people.

2.8. Case studies in the Study of the Experience of Young Homeless People indicated that access to mental health and substance abuse services was disjointed and suggest it's important that young people may need extra support in terms of

²⁰ Llamau, [Study of the Experiences of Young Homeless People](#), 2015.

²¹ Senedd Commission (2023). *If not now, then when? Radical reform for care experienced children and young people*. Welsh Parliament Children, Young People and Education Committee. Available at: [If not now, then when? Radical reform for care experienced children and young people \(senedd.wales\)](#). Accessed 15/09/2023

²² [Don't+Let+Me+Fall+Through+The+Cracks+-+Full+Report.pdf \(squarespace.com\)](#)

attending appointments to ensure consistency in treatment.²³ Such evidence supports the need for a holistic approach (a key working principle of the reforms) to ensure that a broad range of needs are assessed and met through the homelessness application process.

Working-age population

2.9. A Public Health Wales' report found that those with lived experience of homelessness tended to be younger, with the highest levels of lived experiences of homelessness amongst 25-34 year olds, followed by 35-44 year olds.²⁴

2.10. Although homelessness seems to disproportionately impact younger people, older people may face certain health related issues due to their age which may impact on their experience of homelessness. Older people who contributed to research undertaken by Tai Pawb for the Welsh Government, as part of this impact assessment, experienced difficulty in accessing suitable properties from the council when they approached them for support. The lack of supply of suitable accommodation for their needs, meant longer stays in unsuitable or temporary accommodation for some.²⁵

Elderly population

2.11. According to the 2021 Census data for Wales, there are more people than ever before in the older age groups, 21.3% of the population are aged 65 years and over (compared with 18.4% in 2011).²⁶ Our ageing population may lead to more demand on homelessness services to resource suitable and accessible accommodation that meets the needs of an ageing population in the future.

How will you mitigate Impacts?

2.12. The proposed legislative reforms and non-legislative measures will address homelessness amongst a range of ages.

2.13. It is intended that a person-centred approach will include new duties for those working in relevant parts of the Welsh public service to identify risk factors for homelessness and refer a person with one or more of these risk factors to a local

²³ Llamau, [Study of the Experiences of Young Homeless People](#), 2015.

²⁴ Public Health Wales, [Health of individuals with lived experience of homelessness in Wales, during the COVID-19 pandemic](#)

²⁵ [Experiences-of-homelessness-Final-Version-PDF.pdf \(taipawb.org\)](#)

²⁶ [Population and household estimates, Wales - Office for National Statistics \(ons.gov.uk\)](#)

housing authority with their agreement and extend the bodies to whom the duty to co-operate applies. This will help to address issues that can potentially lead to homelessness such as leaving care, problems in education, poor mental and/or physical health, access issues linked with protected characteristics etc. and provide the appropriate support for meaningful intervention to prevent risk of homelessness.

2.14. Stays in unsupported accommodation may have detrimental impacts to the mental wellbeing and health of children. These include living in an environment that they have no control or feeling of ownership over and not having enough space and/or freedom to learn, play and develop. Whilst this White Paper will not address housing supply, the proposals relating to systems reform, allocations and suitability alongside the targeted proposals for children aim to address the research findings related to children and young people. Evidence suggests that a particular issue affecting older people is a lack of suitable accommodation for varying ages (Tai Pawb, 2023).²⁷ The proposed reforms will not directly address supply issues and its success relies on the Welsh Government meeting its parallel commitment to deliver 20,000 low carbon homes for rent in the social sector. However, the proposals do include provision for accessible housing registers which aim to increase efficiency in placing individuals in suitable accommodation.

2.15. Local Housing Market Assessments provide support to local authorities in assessing the local housing need across Wales.²⁸ There are also a number of other strategic requirements on local authorities and others which relate to planning, supply and stock. There is an opportunity within these reforms to ensure that the needs of the homelessness population are prioritised in this strategic planning.

2.16. Disability (consider the social model of disability²⁹ and the way in which your proposal could inadvertently cause, or could be used to proactively remove, the barriers that disable people with different types of impairments)

Reasons for your decision (including evidence)

2.17. According to the 2021 Census, 21.1% of people are disabled in Wales, a higher percentage than England, where 17.7% of people were disabled.³⁰

²⁷ [Experiences-of-homelessness-Final-Version-PDF.pdf \(taipawb.org\)](#)

²⁸ [Local housing market assessment \(LHMA\): guidance for local authorities | GOV.WALES](#)

²⁹ Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search 'social model'.

³⁰ [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

2.18. There is limited evidence related to physical impairments and homelessness in Wales, however there is evidence that your physical health impacts on your risk of homelessness. A report by Cymorth Cymru in 2017 found that amongst respondents who were experiencing homelessness, 27% were “permanently unable to work due to long-term sickness or disability”, and another 9% “intend to look for work but are prevented by temporary sickness or disability”. Cymorth Cymru’s report also highlights that 33% of respondents felt that health problems were a primary or secondary cause of their homelessness.³¹ Furthermore, an evaluation of the Crisis Skylight service found 39% of members self-reported a limiting illness or disability on first contact with a Crisis Skylight.³²

2.19. Research by Public Health Wales suggests that individuals with lived experience of homelessness are also more likely to be managing multiple long-term health conditions, with 13% of people experiencing homelessness alongside 2 or more comorbidities (compared with 3% of the general population comparison group) and 17% with 1 comorbidity (compared with 5% of the general population comparison group).³³

2.20. Crisis’ 2022 ‘Experiences of the Homelessness Reduction Act 2018-2021’ focused on England; however it does provide some insights into disabled people’s experiences of homelessness. The report found that 22% of disabled participants felt their needs had been met by Housing Options, compared to 38% of the whole housing research sample. It was found that 57% of people with learning disabilities received information and advice to help with their housing issue, compared to 69% of those without a learning disability.³⁴

2.21. Online application processes can be difficult for some people with learning difficulties. Disabled people are found to be more likely to be digitally excluded, which might be because of the inaccessibility of technology, that they lack internet access or have low levels of digital literacy.³⁵ The Equality and Human Rights Commission report, ‘Housing and Disabled People: Wales’s hidden crisis’ highlights that many disabled people find the processes and systems to apply for accessible

³¹ [Cymorth_Cymru_Health_Matters_report.pdf](https://cymorthcymru.org.uk/wp-content/uploads/2017/09/Cymorth_Cymru_Health_Matters_report.pdf) (cymorthcymru.org.uk)

³² [Crisis Skylight: Final Report of the University of York Evaluation](https://whiterose.ac.uk/research/evaluation/crisis-skylight-final-report/) (whiterose.ac.uk)

³³ Public Health Wales, [Health of individuals with lived experience of homelessness in Wales, during the COVID-19 pandemic](#)

³⁴ [hra.pdf](#) (localgov.co.uk)

³⁵ [housing-and-disabled-people-wales-hidden-crisis.pdf](https://equalityhumanrights.com/wp-content/uploads/2021/06/housing-and-disabled-people-wales-hidden-crisis.pdf) (equalityhumanrights.com)

homes complex to navigate. It's also been raised that accessing advice and information is increasingly difficult particularly for people with sensory loss.

2.22. There are also reports that the lack of supply of accessible homes means disabled people face longer waiting lists and higher risk of needing to move away from their local area and support networks for housing. Disabled people make up a significant proportion of those living in social housing in the UK, with nearly 1 in 4 (24.9%) disabled people aged 16 to 64 renting social housing, compared with fewer than 1 in 10 (7.9%) non-disabled people in 2021.³⁶ However, according to an Equality and Human Rights Commission report, disabled people tend to face a longer wait to be housed in suitable accommodation.³⁷

2.23. There is currently more demand for social housing than supply allows. This may disproportionately impact on homelessness of disabled people who may be in unsuitable accommodation, including temporary accommodation, whilst waiting for a suitable property. This may also result in people accepting an unsuitable property as it's seen as the best of very few options.³⁸ This could lead to disabled people experiencing repeat homelessness and coming back into the system again as the property isn't suitable for their needs.

2.24. A further issue relates to the paucity of data available on this issue. Only 15% of local authorities in Wales rated the data they held for understanding the current and future needs of disabled people's housing requirements as good (Equality and Human Rights Commission, 2018).³⁹ Tai Pawb's report looking at the experiences of homelessness of people with protected characteristics in Wales highlighted an instance where a lack of appropriate data on a property meant a home that was previously discounted by staff as unsuitable when it was in fact suitable.⁴⁰

2.25. Issues around data capture were also reported in Tai Pawb's research. Disabled participants describe a lack of understanding of individual personal circumstances and inaccessibility of forms and paperwork. There were also reports that participants felt their occupational therapist reports were being ignored (Tai Pawb, 2023, p.14). Other research mentions that some disabled people will not necessarily see themselves as being ill or having health problems and may not

³⁶ [Outcomes for disabled people in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

³⁷ [housing-and-disabled-people-wales-hidden-crisis.pdf \(equalityhumanrights.com\)](https://equalityhumanrights.com/housing-and-disabled-people-wales-hidden-crisis.pdf)

³⁸ [housing-and-disabled-people-wales-hidden-crisis.pdf \(equalityhumanrights.com\)](https://equalityhumanrights.com/housing-and-disabled-people-wales-hidden-crisis.pdf)

³⁹ Page 29 [research-report-115-housing-and-disabled-people-the-role-of-local-authorities.pdf \(equalityhumanrights.com\)](https://equalityhumanrights.com/research-report-115-housing-and-disabled-people-the-role-of-local-authorities.pdf)

⁴⁰ Page 13 [Experiences-of-homelessness-Final-Version-PDF.pdf \(taipawb.org\)](https://taipawb.org/Experiences-of-homelessness-Final-Version-PDF.pdf)

respond to ‘medical’ questions in the same way as others, therefore highlighting the importance of looking at individual circumstances.⁴¹

2.26. Participants in Tai Pawb’s research also indicated that their impairment wasn’t prioritised as they tried to access services and felt that it should have been.⁴²

2.27. The Equality and Human Rights Commission report indicates that there is a lack of understanding around the requirements for different types of impairments. People with physical impairments may be prioritised over people with learning disabilities or people with mental health conditions. However, there is also a lack of understanding around what physical accessibility means for disabled people, meaning that they may be offered unsuitable properties.⁴³

How will you mitigate impacts?

2.28. The Expert Review Panel dedicated a session to the experience of homelessness amongst disabled people and Crisis Cymru ran a stakeholder session on this issue.

2.29. Given that research suggests that disabled people find the homelessness system difficult to navigate, the proposed reforms will look to make homelessness and housing services more accessible and consider how current processes can be simplified to make navigating the system easier. This will include more accessible communication around notification duties. Broader work across the Welsh Government to strengthen national implementation of the social model of disability in the Welsh public service will further support our proposals.

2.30. The reforms will set out to formalise a person-centred approach to addressing homelessness and one benefit of this will be that disabled people feel their needs are addressed.

2.31. Although legislation will not directly address the availability of suitable homes and will have limited impact in addressing long waiting times, Welsh Government have committed to 20,000 low carbon homes for rent in the social sector. Local Housing Market Assessments will also provide support to local authorities in assessing the local housing need across Wales, to ensure the needs of people in Wales, including disabled people are met. There are also a number of other

⁴¹ [Accessible social housing in Gwent \(taipawb.org\)](https://www.taipawb.org/)

⁴² [Experiences-of-homelessness-Final-Version-PDF.pdf \(taipawb.org\)](#)

⁴³ [housing-and-disabled-people-britains-hidden-crisis-main-report_0.pdf \(equalityhumanrights.com\)](#)

strategic requirements on local authorities and others which relate to planning, supply and stock. There is an opportunity within these reforms to ensure that the needs of the homelessness population are prioritised in this strategic planning.

2.32. The proposed legislative reforms will make provision for Accessible Housing Registers to facilitate stronger local knowledge of accessible stock and its availability to improve housing options for disabled people.

2.33. The work on the reforms must consider whether legislation can play a role in improving data collection and data quality in relation to homelessness and how it intersects with protected characteristics to ensure we know more about the impact and experience of homelessness and the impact of the system, e.g. the experience of disabled people in temporary accommodation.

Gender Reassignment (the act of transitioning and transgender people)

Reasons for your decision (including evidence)

2.34. While the term LGBTQ+ is used here as an umbrella term in line with the Welsh Government's LGBTQ+ action plan and data from third sector organisations, the Welsh Government recognises that Sexual Orientation and Gender Reassignment are two distinct protected characteristics of the Equality Act 2010, and some groups of people sharing either or both of those two protected characteristics sometimes are, or identify as, *LGBTQ+*.

2.35. The LGBTQ+ Action Plan for Wales uses the term LGBTQ+ to refer "*to lesbian, gay, bisexual/bi, transgender/trans people, queer or questioning. Other letters can be added to the acronym to include other groups, orientations and identities, such as I (intersex) and A (asexual/aromantic). The + (plus) in the acronym is used as a shorthand to include and acknowledge other diverse terms people identify with and use to describe their identities and orientations, including intersex, asexual and aromantic people*" ([LGBTQ+ Action Plan for Wales 2023](#), page 60)

2.36. According to Stonewall, 1 in 4 transgender people (25%) have experienced homelessness at some point in their lives.⁴⁴ Also, in 2017 1 in 4 (25%) transgender people and 1 in 5 (20%) non-binary people were discriminated against when looking for a house or flat to rent or buy.

⁴⁴ [lgbt_in_britain_-_trans_report_final.pdf \(stonewall.org.uk\)](#)

2.37. Evidence in Stonewall's 2018 '*LGBT in Britain*' report also suggests that transgender people are at high risk of domestic abuse, with 1 in 5 transgender people and 1 in 5 non-binary people having faced domestic abuse (a potential cause of homelessness) from a partner.⁴⁵ This may be further compounded if they lack a family support network, face discrimination from family and/or lack wider social support. In the '*LGBT in Britain: Home and communities*' report it is noted that "more than a third of transgender people (36%) have experienced discrimination or poor treatment in their local LGBT community for being trans" (Stonewall, 2018, p.14).

2.38. Fear of discrimination from homelessness services may be a concern for transgender people when accessing services. The Centre for Homelessness Impact's 2022 report highlights that transgender people report experiencing misgendering and 'dead-naming' (the use of the birth or former name of a transgender or non-binary person without their consent) when accessing services.⁴⁶ This may deter people from accessing services and may also mean people will not want to disclose their gender identity to services. Research in Gwent found that only a third of participants were asked about their gender identity when accessing housing services and when they were asked for this information it was at varying points in the system and not always recorded accurately. A participant highlighted that when information was collected it was incorrect and they were misgendered.⁴⁷

How will you mitigate Impacts?

2.39. There appears to be an increased risk of homelessness for transgender individuals. The proposed reforms aim to provide increased support to people who are transgender who find themselves homeless, particularly since the evidence seems to indicate there are certain risks associated with being transgender and homeless. In direct response to feedback provided by young LGBTQ+ young people we have made proposals to adding additional groups of people to the list of exemptions for the local connection test to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

2.40. The broader proposals related to accessible communication and adherence to the Equality Act 2010 will also benefit those who are transgender.

⁴⁵ [lgbt_in_britain_home_and_communities.pdf \(stonewall.org.uk\)](https://www.stonewall.org.uk/resources/lgbt-in-britain-home-and-communities.pdf)

⁴⁶ Centre for Homelessness Impact, [Sexuality, gender identity and homelessness Incidence, experience and evidence of homelessness among LGBTQ+ people](#), 2022

⁴⁷ Page 33 [Experiences of homelessness Final Version PDF.pdf](#)

2.41. Throughout the consultation period, we are eager to gather additional insights from stakeholders on how to enhance person-centred approaches to safeguard people who are transgender who find themselves homeless.

Pregnancy and maternity

Reasons for your decision (including evidence)

2.42. A survey carried out by Channel 4 Dispatches with the Royal College of Midwives in 2019 found that 99.7% of participating midwives had seen a pregnant woman who was homeless in the past 6 months. 97% had seen at least 1 pregnant woman in overcrowded or unsuitable accommodation and 97% had seen at least 1 pregnant woman sofa-surfing.⁴⁸ Experiencing risk of homelessness or being homeless when pregnant can be stressful, potentially traumatic and will likely have wider impacts on health and wellbeing.⁴⁹ Being homeless may also impact a person's ability to engage with antenatal care and midwife/health visitor visits during the post-natal period. Should they have an abortion or miscarriage, the experience of homelessness may impact recovery time and raise additional health risks.

How will you mitigate impacts?

2.43. The proposed reforms will look at the role of the wider public service in relation to homelessness. Early intervention will be a key aim of this and proposed new duty to identify and refer as well as the proposed extended duty to co-operate offer benefits for pregnant people at risk of or experiencing homelessness. Pregnancy is currently a Priority Need category and we are keen throughout the forthcoming consultation period to assess any emerging risks for pregnant people through our proposed reforms to remove this test and mitigate these. It is not our policy intention that any group have a sense that they are de-prioritised through the abolition of priority need and we do not believe this will be the case in practice.

Race

2.44. Evidence suggests that some Ethnic Minority groups are more likely to experience hidden homelessness than others and therefore may not be included in

⁴⁸ 'Dispatches and RCM find that 99.7% of midwives have seen mothers who were homeless over the past six months'

⁴⁹ Barriers and facilitators perceived by women while homeless and pregnant in accessing antenatal and or postnatal healthcare: A qualitative evidence synthesis - McGeough - 2020 - Health & Social Care in the Community - Wiley Online Library

statistics as they are more likely to stay with friends or may be less likely to access homelessness services.⁵⁰

Black, Asian and Minority Ethnic People

2.45. Although there is limited research on homelessness amongst Black, Asian and Minority Ethnic people, there is some evidence that Black, Asian and Minority Ethnic people experience disproportionate levels of homelessness in the UK.⁵¹ Black, Asian and Minority Ethnic households have been found to be 3 times more likely to become homeless than the majority White population. There are also differences between ethnic groups. In Wales, Black people made up 3.1% of homeless applicants in 2021, however they made up less than 0.7% of Wales' population in 2016. Asian people made up 2.4% of homeless applications in 2021, but 2% of the population in 2016. The Mixed group made up 1.4% of homeless applications in 2021, but 0.8% of the population in 2016. The "other" group made up 5.1% of homeless applications in 2021, but only 0.7% of the population in 2016. These figures suggest that although the proportion of Black, Asian and Minority Ethnic populations in Wales are relatively low the percentage of homeless applications within those populations is high.⁵² It's been found that relationship breakdown, domestic abuse, overcrowding and financial problems were contributing factors to homelessness in Black, Asian and Minority Ethnic communities.⁵³

2.46. Households headed by Black, Asian and Minority Ethnic people have a higher risk of overcrowding in comparison with households headed by White people. Black led households were found to be almost 6 times more likely and Pakistani and Bangladeshi led households were almost 10 times more likely to live in overcrowded conditions.⁵⁴ It's been found that that homelessness and other acute housing problems such as overcrowding are more likely to affect Pakistani and

⁵⁰ "Hidden" homelessness in the UK: evidence review - Office for National Statistics (ons.gov.uk)

⁵¹ Page 6

[Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf](#) (hw.ac.uk)

⁵² Page 22

[Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf](#) (hw.ac.uk)

⁵³ Page 8

[Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf](#) (hw.ac.uk)

⁵⁴ Page 17

[Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf](#) (hw.ac.uk)

Bangladeshi people than other groups.⁵⁵ Census-based analysis has also indicated stable and high levels of adult sharing among Indian, as well as other South Asian groups in England and Wales, which may increase demand for larger housing.

2.47. It is unclear whether experiences of discrimination increase the risk of homelessness or whether Black, Asian and Minority Ethnic people who are homeless are at higher risk of discrimination. However, evidence suggests that experiences of discrimination on grounds of race or ethnicity appears to be associated with elevated risks of homelessness and 1/3 (32%) of Black people with experience of homelessness reported discrimination from a landlord.⁵⁶

2.48. Research undertaken on Bristol residents suggests that complexities surrounding the Universal Credit and social housing systems, combined with racism, creates an environment where hidden forms of homelessness such as sofa surfing can seem a more viable option for some Black, Asian and Minority Ethnic people rather than seeking help from local authorities or social landlords.⁵⁷

2.49. There is a disconnect between the housing needs of Black, Asian and Minority Ethnic people and lack of cultural and religious awareness, language barriers, structural/institutional racism. It may also be the case that Black, Asian and Minority Ethnic people may understand less about the housing systems in England and Wales than their White counterparts.⁵⁸

2.50. Bangladeshi and Pakistani households have been described as two and a half times more likely to experience housing disadvantage. Those who came to Britain between 2007 and 2011 were 25% more likely and holders of other passports 15% more likely to experience housing disadvantage than those born in the UK or UK passport holders, respectively.⁵⁹

⁵⁵ Page 9

[Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf](#) (hw.ac.uk)

⁵⁶ Page 7

[Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf](#) (hw.ac.uk)

⁵⁷ [Housing_Report_2020.pdf](#) (squarespace.com)

⁵⁸

[Homelessness_Amongst_Black_and_Minoritised_Ethnic_Communities_State_of_the_Nation_Report_2.pdf](#) (hw.ac.uk)

⁵⁹ [Slippery discrimination: a review of the drivers of migrant and minority housing disadvantage](#) (st-andrews.ac.uk)

Gypsies, Roma and Travellers

2.51. A recent Senedd inquiry found a lack of suitable supply of accommodation for Gypsies and Travellers in Wales, alongside widescale problems related to the maintenance and repair of sites. The report highlights problems with overcrowding and insufficient toilet and shower blocks.⁶⁰

2.52. The Senedd report also highlights a significant increase in the number of phone calls from individuals who are living on their friends' and families' plots in conditions that are overcrowded, who then want to enter the homelessness system officially and be in hostels.⁶¹ The Improving Race Equality in Housing and Accommodation report found that based on 2011 Census data 28.7% of Gypsy or Travellers were living in overcrowded households, compared with 3.9% for the least overcrowded group in Wales.⁶²

2.53. There is some evidence to suggest that domestic abuse is a significant issue in the Gypsy and Traveller community. One study found that around 60% - 80% of women from Travelling communities experience domestic abuse during their lives.⁶³ There is also evidence that domestic abuse is a cause for homelessness, particularly amongst women.⁶⁴ This is further discussed under the 'Sex/Gender' heading.

2.54. Case studies in Tai Pawb's report show that lack of suitable accommodation (permanent or temporary) impacts on people experiencing homelessness who are from the Gypsy and Traveller community. Challenges include a lack of supply of larger homes and a lack of culturally appropriate accommodation. The people who contributed to case studies also report a feeling of being judged and that they were not being treated fairly.⁶⁵

⁶⁰ [Provision of sites for Gypsy, Roma and Travellers \(senedd.wales\)](#)

⁶¹ [Page 12 Provision of sites for Gypsy, Roma and Travellers \(senedd.wales\)](#)

⁶² [Page 7 Improving-Race-Equality-in-Housing-and-Accommodation-.pdf \(wcpp.org.uk\)](#)

⁶³ [Gypsies and Travellers - First Light](#)

⁶⁴ [crisis_nations_apart_2014.pdf](#)

⁶⁵ [Experiences of homelessness Final Version PDF.pdf](#)

Asylum Seekers & Refugees

2.55. There is substantial evidence that some vulnerable groups of migrants, particularly those with No Recourse to Public Funds (NRPF), are at acute risk of both homelessness and destitution.⁶⁶

2.56. There has been a sharp rise in those accommodated by the Home Office in Section 98 accommodation (short term placements in hotels awaiting dispersal accommodation), with over 10,000 people in Section 98 accommodation at the end of June 2021.⁶⁷ Homeless Link indicates that the granting of refugee status can lead to an increased risk of homelessness. People may be given little notice to leave their dispersal accommodation and may be dealing with trauma, on top of trying to navigate a new country.⁶⁸ Asylum Seekers and Refugees may have small or no support networks in Wales. This may mean they could face the more acute end of homelessness and may lack support. They may also not be sure how to navigate homelessness services and may be fearful of presenting to services they may fear presenting due to fear of discrimination.

2.57. People with no recourse to public funds (NRPF) may be at risk of the more acute end of homelessness as they're not eligible for homelessness or housing assistance. As at mid-May 2020, local authorities in England reported having taken in 2,500 people who were not eligible for statutory homelessness assistance (that is, because of their immigration status).⁶⁹

2.58. Citizens Advice research says that 48% of people with no recourse to public funds (NRPF) report living in overcrowded accommodation and 18% have experienced homelessness or housing insecurity.⁷⁰

2.59. Case studies in Tai Pawb's report looking at the experiences of homelessness of people with protected characteristics mention that a number of participants felt that the asylum seeker support ending within 28 days of the granting of refugee status was a primary cause of their homelessness. The quality and supply of appropriate accommodation was also mentioned as an issue. Trauma from previous experiences was also mentioned, alongside friction with staff. The inability to work

⁶⁶ Bramley, G., Fitzpatrick, S., McIntyre, J., & Johnsen, S. (2022). *Homelessness amongst Black and minoritised ethnic communities in the UK: a statistical report on the state of the nation*. Heriot-Watt University.

⁶⁷ [Preventing homelessness amongst new refugees | Homeless Link](#)

⁶⁸ [Preventing homelessness amongst new refugees | Homeless Link](#)

⁶⁹ [Page 25 Investigation into the housing of rough sleepers during the COVID-19 pandemic \(nao.org.uk\)](#)

⁷⁰ [No Recourse to Public Funds - Citizens Advice](#)

meant people didn't feel they were integrating into the community and were unable to access the private rented sector due to finances. Participants felt there was a lack of understanding about the system and some were fearful to contact authorities for support for fear of deportation. There were also language barriers.⁷¹

2.60. Respondents to the Tai Pawb work report needing to sleep on friends' floors, use emergency accommodation or rough sleeping. One individual felt their life was on hold as the asylum process and sporadic periods of homelessness had gone on for over 10 years. Another individual felt ignored when they presented at Housing Options due to the long wait. They felt their health needs weren't taken into consideration by Housing Options. They also faced difficulties with being turned away from emergency accommodation as they didn't have a bank account and were unable to claim benefits and were turned away from emergency accommodation due to not being able to fund their place.⁷²

How will you mitigate Impacts?

Black, Asian and Minority Ethnic People

2.61. Our broader policy aims to create a person centred, accessible homelessness system will bring benefits to Black, Asian and Minority Ethnic communities who appear to disproportionately experience homelessness. The proposed reforms are dependent on creating a greater supply of accommodation that suits the needs of a range of different service users. This is particularly relevant to this protected characteristic as the evidence suggests that Black, Asian and Minority Ethnic people are at higher risk of homelessness, particularly hidden homelessness (e.g. overcrowding). Larger properties will be needed in order to provide culturally appropriate. Such accommodation must also be culturally appropriate; evidence suggests that some Black, Asian and Minority Ethnic people may have reservations of being housed in certain areas due to them feeling that some areas may have a heightened risk of racism. Although the proposed reforms will not directly address the availability of suitable homes, Welsh Government have committed to 20,000 low carbon homes for rent in the social sector. Local Housing Market Assessments will also provide support to local authorities in assessing the local housing need across Wales, to ensure the needs of people in Wales are met. Our proposals related to suitability seek to end long term housing in overcrowded conditions.

⁷¹ [Experiences of homelessness Final Version PDF.pdf](#)

⁷² [Experiences of homelessness Final Version PDF.pdf](#)

2.62. Evidence shows Black, Asian and Minority Ethnic people have experienced complexities around the systems, in particular social housing systems, which may result in people not accessing support services. The proposed reforms will consider how we can make housing and homelessness systems more accessible to ensure people understand the systems and feel they can access and navigate them.

2.63. Evidence shows racism has an impact on homelessness. There are actions in the Anti-Racist Wales Action Plan aimed at making organisations more representative of the people they serve. The success of both the Anti-Racist Wales Action Plan and the proposed reforms will have significant positive impacts for these groups.

Gypsies & Travellers

2.64. It is crucial that when considering homelessness and housing need, we are cognisant of the needs of those who have an aversion to bricks and mortar accommodation. Our proposals around exemptions for non-familial connections with communities related to local connection bring benefits to this group alongside the specific proposals we make around culturally appropriate accommodation. These proposals are in direct response to feedback provided during the work of the Expert Review Panel on the experience of homelessness amongst Gypsies and Travellers.

Asylum Seekers and Refugees

2.65. Immigration matters are reserved to the UK Government but we will work with officials in relevant departments to explore options which prevent the homelessness of this group. As we set out in the White Paper, we believe there to be particular value in reviewing the current 28 day cessation notice procedure, which is raised repeatedly in the literature and through our own engagement work. We are also considering broader policy options related to funding and training to strengthen support for this vulnerable group in Wales.

Religion or belief and non-belief

Reasons for your decision (including evidence)

2.66. Data on religion, belief and non-belief and how this relates to homelessness is limited. However, people experiencing homelessness may be unable to practice their religious or cultural practices if they're not in accommodation or suitable accommodation (e.g. with enough space to pray). If someone has presented at housing or homelessness services they may be concerned about discrimination because of their beliefs. Someone experiencing homelessness may also have requirements around where they are housed (either temporary or permanently) due

to the need to be close or have transport links to buildings of importance to them (e.g. churches, mosques). People at risk of or experiencing homelessness may also want to stay in certain areas to be close to support networks from within their religious or faith communities.⁷³

2.67. The Census 2021 found that households where all members identified as “Muslim” were nearly four times more likely to be in overcrowded accommodation in comparison to all households in Wales.⁷⁴ Occupancy ratings may be influenced by the differing age profiles of religious groups. ONS analysis (Religion by age and sex, England and Wales: Census 2021) found that people who described themselves as “Muslim” had the youngest average age at 27 years, while people who described themselves as “Christian” had the oldest average age at 51 years.⁷⁵

How will you mitigate Impacts?

2.68. As people experiencing homelessness may have a range of religions or beliefs, a suitable supply of accommodation in different areas (e.g. some close to or with good transport links to mosques, synagogues, churches etc) will be necessary. Although legislation will not directly address the availability of suitable homes, we have committed to 20,000 low carbon homes for rent in the social sector. Local Housing Market Assessments will also provide support to local authorities in assessing the local housing need across Wales, to ensure the needs of people in Wales are met.

2.69. In addition it is proposed that additional groups of people will be added to the list of exemptions under the “Local Connection test”, to allow for non-familial connections with communities and to better take account of the reasons why someone is unable to return to their home authority.

2.70. Due to the potential perception of discrimination that people may fear when presenting to services, the importance of facilitating the person-centred approach which is at the heart of the vision for the proposed reforms, is of enhanced importance.

⁷³ People, Place & Policy Online: Issue 1: The Margins of Public Space - Muslims and Social Housing in England (shu.ac.uk)

⁷⁴ Religion by housing, health, employment, and education, England and Wales - Office for National Statistics (ons.gov.uk)

⁷⁵ Religion by age and sex, England and Wales - Office for National Statistics (ons.gov.uk)

Sex

Reasons for your decision (including evidence)

Men

2.71. Data from the ONS shows that single men aged between 24 – 49 make up the largest group of people who are experiencing homelessness and seeking help.⁷⁶ Crisis' Nations Apart Report has found that most single homeless people are male, making up 83% of this cohort. Their study found that the majority of single homeless people are young single men with multiple support needs.⁷⁷ Public Health Wales Research supports this and found that individuals with lived experiences of homelessness tend to be male and younger.⁷⁸ The experience of single men is exacerbated by a chronic lack of single person accommodation in Wales.

Women

2.72. *Women and Homelessness; Putting Gender back on the Agenda* highlights research that homeless female participants sought out places that were less visible for safety, such as, public toilets or garages.⁷⁹ Such behaviour leads to lower visibility of homelessness amongst women compared to men, which is increased by potential higher experience of sofa surfing, staying with family and friends or in refuge accommodation.⁸⁰ Additionally, although men aged 24 – 49 make up the largest group of people experiencing homelessness and seeking help according to ONS data, this data also highlighted that among single parents, the majority of applicants are female.⁸¹

2.73. Research conducted by Crisis between June 2010 and January 2011 found that 28% of homeless women had spent the night with someone for accommodation, compared to 14% of men. It was also found that 19% of women had engaged in sex work (in comparison with 3% of men) because this offered an opportunity to spend the night with a client.⁸²

⁷⁶ UK homelessness - Office for National Statistics (ons.gov.uk)

⁷⁷ Crisis, *Nations Apart? Experiences of single homeless people across GB*, 2014

⁷⁸ Public Health Wales, *Health of individuals with lived experience of homelessness in Wales, during the COVID-19 pandemic*

⁷⁹ Page 168 *women-homelessness-putting-gender-on-the-agenda.pdf* (shu.ac.uk)

⁸⁰ Page 2 *Myth_Busting_cVUs0i9.pdf* (kxcdn.com)

⁸¹ UK homelessness - Office for National Statistics (ons.gov.uk)

⁸² Page 48 *the_hidden_truth_about_homelessness.pdf* (crisis.org.uk)

2.74. There are links between violence and homelessness amongst women and the experiences of homelessness are often shaped by gender-based violence.⁸³ Statistically women are more likely to experience domestic abuse than men. The Crime Survey for England and Wales (CSEW) estimated that 6.9% of women and 3% of men aged 16 years and over experienced domestic abuse in the year ending March 2022.⁸⁴ Crisis' 2014 Nations Apart report found that 61% of women respondents experiencing homelessness had faced violence/abuse from a partner. They also found that 38% of women were at risk of their children being looked after by someone else, in comparison with 9% of men.⁸⁵ This may link to the number of single parent applicants being mostly female as they may have difficulty accessing help and suitable accommodation for their children or less opportunities to share parenting responsibilities.⁸⁶

2.75. Tai Pawb's research reports a case study where a homeless woman who was a victim of domestic abuse risked losing her children in taking up an emergency offer of accommodation.⁸⁷ Tai Pawb's report mentions women face challenges regarding safe homes and one participant said services should be more considerate to the housing needs of women suffering from domestic abuse or violence. Another participant had been raped prior to being accommodated in a house of multiple occupancy with 6 men which meant she spent days locked in her room due to fear and trauma but was still waiting for suitable accommodation.⁸⁸ Research by Crisis undertaken in 2016 found that of the 72 women who completed their survey, 31% had been sexually assaulted, interfered with or attacked whilst homeless.⁸⁹

2.76. The availability of appropriate accommodation for women has been found to have an impact on women experiencing homelessness. Case studies in the Centre for Homelessness Impact's report highlight that women who have been abused feel unsafe in mixed-sex hostels and this may result in them sleeping on the streets. The report also raised that women escaping violence who are housed outside of their local area and support network may result in them feeling isolated and lacking support. This may also result in people turning down unsuitable offers and experiencing homelessness due to a lack of suitable options.⁹⁰

⁸³ Centre for Homelessness Impact, [Women, homelessness and violence: what works?](#), 2021

⁸⁴ [Domestic abuse in England and Wales overview - Office for National Statistics \(ons.gov.uk\)](#)

⁸⁵ Crisis, [Nations Apart? Experiences of single homeless people across GB](#), 2014

⁸⁶ [UK homelessness - Office for National Statistics \(ons.gov.uk\)](#)

⁸⁷ Page 17 [Experiences-of-homelessness-Final-Version-PDF.pdf \(taipawb.org\)](#)

⁸⁸ [Experiences-of-homelessness-Final-Version-PDF.pdf \(taipawb.org\)](#)

⁸⁹ [Research reveals extent of sexual violence against female rough sleepers – womensgrid](#)

⁹⁰ Centre for Homelessness Impact, [Women, homelessness and violence: what works?](#), 2021

How will you mitigate Impacts?

2.77. Men are more likely to experience acute homelessness, particularly street homelessness than women. Our proposals seek to strengthen prevention activity and ensure the system is accessible. We believe our proposals to abolish priority need, in particular, will bring positive impacts to single men who did not benefit as much as we had hoped from the 2014 legislation.

2.78. In comparison women may face more hidden homelessness (although data in this area is limited) and experience a dangerous intersecting experience of risk of homelessness and gender-based violence. The Tai Pawb research highlights the need for earlier intervention and more sustainable accommodation solutions. The amount of time waiting for accommodation was an issue in the women's case studies in Tai Pawb's report. The proposed reforms will not directly address supply issues and its success relies on the Welsh Government meeting its parallel commitment to deliver 20,000 low carbon homes for rent in the social sector. However, our proposals around prevention, suitability and removal of the current "tests" which determine what duties are owed by a local authority under the current legislation (i.e. "priority need") will mitigate the impacts describe above.

2.79. Moreover, our proposals in relation to survivors of violence against women, domestic abuse and sexual violence will bring positive impacts for all victims of this type of abuse; mainly women and create a more accessible system

Sexual orientation

Reasons for your decision (including evidence)

2.80. While the term LGBTQ+ is used here as an umbrella term in line with the Welsh Government's LGBTQ+ action plan and data from third sector organisations, the Welsh Government recognises that Sexual Orientation and Gender Reassignment are two distinct protected characteristics of the Equality Act 2010, and some groups of people sharing either or both of those two protected characteristics sometimes are, or identify as, *LGBTQ+*.

2.81. The LGBTQ+ Action Plan for Wales uses the term LGBTQ+ to refer "*to lesbian, gay, bisexual/bi, transgender/trans people, queer or questioning. Other letters can be added to the acronym to include other groups, orientations and identities, such as I (intersex) and A (asexual/aromantic). The + (plus) in the acronym is used as a shorthand to include and acknowledge other diverse terms people identify with and use to describe their identities and orientations,*

including intersex, asexual and aromantic people” ([LGBTQ+ Action Plan for Wales 2023](#), page 60).

2.82. It is challenging to assess the full experience of homelessness amongst LGBTQ+ people as data on people’s sexual orientation is not routinely collected across services. It is also the case that some individuals may not feel comfortable declaring their sexual orientation and may be concerned about discrimination.⁹¹ Research in Gwent found that only 8% of participants were sure they were asked about their sexual orientation when asking for help.⁹²

2.83. However, some research suggests sexual orientation does impact on the likelihood of experiencing homeless. Stonewall suggests that almost 1 in 5 LGBTQ+ people (18 per cent) have experienced homelessness at some point in their lives.⁹³

2.84. Tai Pawb’s 2023 report on experiences of those with protected characteristics highlights that LGBTQ+ people can develop strong connections with found / chosen families. Found / chosen families are relationships which are sometimes considered to offer a more important form of support than blood relations as LGBTQ+ people can feel they are able to be themselves and feel more accepted by their found / chosen family. This may be particularly important if an individual faces discrimination at home as a result of their sexual orientation and they may choose to or be forced to move away from the area. The individual may then develop a found / chosen family but if the individual faces homelessness these relationships may not be considered as equal relationships to that of blood relations under the local connection test.⁹⁴

2.85. Gwent’s research highlights that experiences of temporary accommodation were mixed amongst LGBTQ+ people. One participant highlighted that a lack of accommodation could lead to repeat and/or hidden homelessness.⁹⁵

2.86. 24% of young people experiencing homelessness identify as LGBTQ+ and there appear to be an intersection between sexual orientation, homelessness and being a young person.⁹⁶ This may be as a result of LGBTQ+ people facing

⁹¹ Centre for Homelessness Impact, [Sexuality, gender identity and homelessness Incidence, experience and evidence of homelessness among LGBTQ+ people](#), 2022

⁹² [Experiences of homelessness Final Version PDF.pdf](#)

⁹³ [LGBTQ+ facts and figures | Stonewall](#)

⁹⁴ Page 35 [Experiences-of-homelessness-Final-Version-PDF.pdf](#) ([taipawb.org](#))

⁹⁵ Page 33 [Experiences-of-homelessness-Final-Version-PDF.pdf](#) ([taipawb.org](#))

⁹⁶ Centre for Homelessness Impact, [Sexuality, gender identity and homelessness Incidence, experience and evidence of homelessness among LGBTQ+ people](#), 2022

discrimination from their family and therefore leaving the family home sooner than they would have if they didn't face discrimination.

2.87. The Albert Kennedy Trust found that 77% of young people believed their sexual / gender identity was a causal factor in rejection from their home.⁹⁷ The Albert Kennedy Trust also found that 61% of LGBTQ+ young people felt frightened or threatened by their family members before they became homeless.⁹⁸ Research from Gwent highlights that family mediation doesn't always work in such circumstances.⁹⁹

2.88. LGBTQ+ young people experiencing homelessness are more likely to experience targeted violence, sexual exploitation, substance misuse and physical and mental health problems than other homeless young people.¹⁰⁰ 17% of LGBTQ+ young people felt they had to have casual sex to find somewhere to stay whilst they were homeless.¹⁰¹

2.89. Homelessness can also affect older LGBTQ+ people. Since the pandemic Stonewall Housing has seen an increase of 70% in people aged 50 or over accessing their services.^{102 103} Stonewall reports that LGBTQ+ older people experiences differ to non-LGBTQ+ older people in the following ways: having homophobic landlords, harassment from neighbours and increased loneliness. If an LGBTQ+ older person is at risk of or experiencing homelessness they may not be able to rely on family networks for support and also may be more at risk of homelessness if they are facing discrimination from landlords or neighbours. They may also have requirements to be housed in a specific area which may be seen to be more LGBTQ+ friendly and where risk of discrimination is reduced. This may result in a longer wait in temporary accommodation for a space in their area to become available. They may also face similar issues with local connection and as they're older they may have developed even stronger relationships with found or chosen families.

⁹⁷ The Albert Kennedy Trust, [LGBT YOUTH HOMELESSNESS: A UK NATIONAL SCOPING OF CAUSE, PREVALENCE, RESPONSE, AND OUTCOME](#)

⁹⁸ [NEW: The LGBTQ+ Youth Homelessness Report | akt](#)

⁹⁹ [Experiences of homelessness Final Version PDF.pdf](#)

¹⁰⁰ [Download.ashx \(akt.org.uk\)](#)

¹⁰¹ [NEW: The LGBTQ+ Youth Homelessness Report | akt](#)

¹⁰² Stonewall Housing provide housing support to lesbian, gay, bisexual, trans and queer (LGBTQ+) people in the UK.

¹⁰³ [Why LGBTQ+ people over 50 who experience homelessness need our focus too | Homeless Link](#)

How will you mitigate Impacts?

2.90. The proposed reforms will consider how a person-centred approach can be taken in service provision. This action aims to improve the accessibility of services for people who are LGBTQ+. Also, adopting a more trauma informed approach will help to address the issues LGBTQ+ people may experience with feeling like they are being tested on their level of need or are not being understood due to differences in lifestyle/culture. This will also be beneficial to those who have had traumatic experiences with family relationship breakdowns and/or while homeless and may be at risk of reinforcing said past trauma when presenting to support services and repeating their story.

2.91. In cases where there have been breakdowns of family relationships, LGBTQ+ people may form supportive, family-like friendships or support groups within their community. The proposed reform has considered the local connection test to ensure that this does not disadvantage this group and that different types of support networks/local links are considered.

Marriage and civil partnership

Reasons for your decision (including evidence)

2.92. Across Great Britain single adults comprise around two thirds of people entitled to some form of material homelessness assistance from local authorities, with lone parents comprising the great majority of the remainder.¹⁰⁴ Over 60% of homelessness applications between 2020-2021 in Wales were for single adults.¹⁰⁵ However, if you are married or in a civil partnership and homeless, your living situation may place additional strain on your relationship.

How will you mitigate impacts?

2.93. As part of proposed reforms, the Welsh Government will look to make housing services accessible to all, including those who are married or in a civil partnership. We will look to make sure people who are homeless and married or in a civil partnership have suitable accommodation and are allocated suitable homes through the allocation processes.

¹⁰⁴ Page 57 [the-homelessness-monitor-great-britain-2022_full-report_final.pdf](#) (crisis.org.uk)

¹⁰⁵ Page 58 [the-homelessness-monitor-great-britain-2022_full-report_final.pdf](#) (crisis.org.uk)

Potentially vulnerable groups who share characteristics which are not formally protected under the Equality Act 2010

Low-income households

Reasons for your decision (including evidence)

2.94. The Homelessness and Poverty: reviewing the links report (2014) indicates that homeless people suffer from persistently low income.¹⁰⁶ The Homelessness Monitor: Great Britain 2022 report acknowledges that as disposable incomes fall (through the cost of living crisis) this will diminish the ability of lower income households to pay for food, energy, and other essentials, producing widespread concern about rising poverty across the UK, a key risk factor for homelessness.¹⁰⁷

2.95. Crisis' 2014 Nations Apart report found that 64% of respondents who had faced homelessness had been unemployed.¹⁰⁸

2.96. Crisis carried out research looking at an online survey of 2,000 people, who were nationally representative of low-income households in Great Britain (those with an income in the bottom 40% of all household incomes, adjusted for household size and composition). They found that nearly one in four (23%) of householders on low incomes had past experience of homelessness. One in eleven (9%) low-income households said it was likely they would face eviction in the coming winter, which could potentially lead to homelessness. Qualitative interviews were also held with 40 people who had been at risk of or experienced homelessness during 2022. The research findings indicate that those in temporary accommodation were concerned about their living costs once they leave their temporary accommodation, one participant in the research decided to stop bidding on properties due to concerns about being able to heat it.¹⁰⁹

2.97. Challenges with temporary accommodation were reported in the research, with people reporting having to pay for storage facilities for their belongings, relying on takeaway or pre-prepared meals which were more expensive than cooking, paying for washing their clothes due to a lack of laundry facilities and people facing high travel costs due to where they had been placed were challenges reported in the research.¹¹⁰

¹⁰⁶ [Homelessness_Poverty_FullReport.pdf \(hw.ac.uk\)](#)

¹⁰⁷ [the-homelessness-monitor-great-britain-2022_full-report_final.pdf \(crisis.org.uk\)](#)

¹⁰⁸ Crisis, Nations Apart? Experiences of single homeless people across GB, 2014

¹⁰⁹ [experiences-of-homelessness-during-a-cost-of-living-crisis_full-report.pdf](#)

¹¹⁰ [experiences-of-homelessness-during-a-cost-of-living-crisis_full-report.pdf](#)

2.98. They also found in their research that for many people the cost of living was one of multiple pressures that contributed to them losing their home. There were also instances where homelessness was triggered by factors that wouldn't obviously be linked to money, e.g. relationship breakdown.¹¹¹ However, stress on finances could be considered a contributing factor to main triggers for homelessness, such as relationship breakdowns. Practice based feedback suggests that some protected groups will disproportionately and cumulatively feel this pressure.

2.99. The research findings indicate that people on low-income were making large efforts to avoid homelessness, with 23% skipping meals over the previous 12 months to save money and 29% saying they would likely need to skip meals to keep up with their housing costs over the coming winter (2022). This figure rises to 43% among householders with children.¹¹²

2.100. Many interviewees said they couldn't afford rents in the private rented sector and people said they had limited disposable income or savings for new costs, including deposits and sometimes where 1 months' rent in advance was required as well.¹¹³ In the 'Evidencing the link between the Local Housing Allowance freeze and Homelessness' report it says that an increase in the number of households with a LHA-rent gap is positively associated with a higher number of households in temporary accommodation. It's estimated that for every 1,000 households experiencing a shortfall between their LHA rate and rent, 44 will require temporary accommodation.¹¹⁴ An inability to access suitable housing that is affordable can sustain homelessness in addition to causing it.¹¹⁵

2.101. 'The Homelessness Monitor: Great Britain' (Crisis, 2022) looks at the projected core homelessness by category in Great Britain, 2012-2041 and found that the largest increase in absolute numerical terms would be in sofa surfing. It indicates that drivers of these increases include a decrease in employment numbers, an increase in unemployment numbers and changes in income, poverty,

¹¹¹ [experiences-of-homelessness-during-a-cost-of-living-crisis_full-report.pdf](#)

¹¹² [experiences-of-homelessness-during-a-cost-of-living-crisis_full-report.pdf](#)

¹¹³ Page 13 [experiences-of-homelessness-during-a-cost-of-living-crisis_full-report.pdf](#)

¹¹⁴ Page 9 Microsoft Word - Evidencing the link between the LHA freeze and homelessness-Full report-pub5Feb20.docx (local.gov.uk)

¹¹⁵ [Housing models and access | Crisis UK](#)

house prices and rents, and expected reduced rates of social lettings as well as the ending of the evictions moratorium in the private rented sector.¹¹⁶

How will you mitigate impacts?

2.102. Evidence suggests there is a link between low income and homelessness and we note the need for consideration of what makes suitable accommodation to include an assessment of affordability. Our proposals around core reform, strengthened prevention will help to mitigate impacts, however our proposals are dependent on wider policy measures to succeed, particularly reform to the benefits system, including an uplift in the LHA. Our proposals will also be supported by the separate work underway by the Welsh Government on housing adequacy and affordability.

Prison Leavers

Reasons for your decision (including evidence)

2.103. In Crisis' Nations Apart report 57% of homeless people in Wales surveyed had served a prison sentence.¹¹⁷ Looking at the UK, 43% of homeless men surveyed had served a prison sentence, whilst 28% of homeless women surveyed had served a prison sentence. 30% of Black, Asian and Minority Ethnic people surveyed had served a prison sentence, compared with 46% for White British and 9% for White Other.¹¹⁸ More than a quarter of respondents had committed a crime in order to get accommodation.¹¹⁹

2.104. In 2021 the Ministry of Justice reported that 15% of people in prison in England and Wales had been homeless before entering custody.¹²⁰ The Ministry of Justice also indicates that prison leavers are 50% more likely to re-offend if released into homelessness.¹²¹ Between April 2020 – March 2021, more than half of prison leavers were released without settled accommodation and 3,194 people across England and Wales were released into homelessness.¹²²

2.105. White people made up 72% of the prison population, Black people made up 13% and Asian, Mixed or Other Minority Ethnic groups represented 15% of all

¹¹⁶ Page 78 [the-homelessness-monitor-great-britain-2022_full-report_final.pdf](https://www.crisis.org.uk/wp-content/uploads/2022/04/the-homelessness-monitor-great-britain-2022_full-report_final.pdf) (crisis.org.uk)

¹¹⁷ Crisis, [Nations Apart? Experiences of single homeless people across GB](#), 2014

¹¹⁸ Crisis, [Nations Apart? Experiences of single homeless people across GB](#), 2014

¹¹⁹ Crisis, [Nations Apart? Experiences of single homeless people across GB](#), 2014

¹²⁰ Nacro, [Is the Government's rough sleeping target on track? The criminal justice perspective](#), 2023

¹²¹ [£70 million to keep prison leavers off the streets and cut crime - GOV.UK](#) (www.gov.uk)

¹²² [Thousands of prisoners released homeless during pandemic, data shows](#) (swlondoner.co.uk)

prisoners in England and Wales as of 31 March 2022.¹²³ According to the 2021 Census 82% of the population in England and Wales are White. People from Asian ethnic groups make up the second largest percentage of the population (9.3%), followed by Black (4%), Mixed (2.9%) and other (2.1%) ethnic groups. Therefore, this seems to suggest that these groups are over-represented in the prison population.

How will you mitigate Impacts?

2.106. Lack of join up between services and poor communication can cause people to be left without the support that they need to find and/or retain housing as they enter and leave the prison system. Improved partnership working between housing and wider public services can help to mitigate this.

2.107. Due to long waiting times and cases being picked up at crisis point where it is sometimes too late for services to find accommodation, there is a risk of prison leavers going on to reoffend in order to get accommodation. This can result in repeated presentations to homelessness services, putting pressure on their resources and creating an unstable, low standard of living for the prison leaver. This can be addressed by allowing staff to intervene at an earlier point in the criminal justice process to allow time for prevention work to take place.

2.108. As people from Black, Asian and Minority Ethnic groups are over-represented in the prison population this could mean they may be impacted more by the links with homelessness and experience of the prison system. This could also indicate that homelessness services for prison leavers from this particular group may not be as accessible. Working towards a more person-centred approach may help to mitigate this somewhat.

2.109. The White Paper provides a series of comprehensive proposals around homelessness and the Criminal Justice System which will seek to bring positive impacts for this group, particularly at reception stage.

¹²³ [HMPPS Offender Equalities Report 2021/22 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Ex-armed forces personnel/veterans

Reasons for your decision (including evidence)

2.110. The Census 2021 suggests there are around 115,000 veterans in Wales which is 4.5% of the population.

2.111. Data suggests the numbers of-ex armed forces personnel coming through the homelessness system is low. Of the 2,631 households who were owed a duty in 2018-19 (the last full year for which we have data) between 6 and 9 were ex-armed service personnel.¹²⁴ However, engagement undertaken by Crisis and the Welsh Government to develop the White paper suggests ex-service personnel encounter a number of barriers related to homelessness to be considered as part of the aims of the White Paper.

2.112. The National Housing Pathway for Ex-Service Personnel provides a strong framework for multi-agency working, but our engagement work suggests there is more to do in embedding this practice across Wales. A strong package of support for the armed forces, their families and veterans in Wales is already in place and this will be complemented by delivery of the broader aims of these proposed reforms; to ensure a needs led, person centred and trauma- informed response to those experiencing or at risk of homelessness

How will you mitigate Impacts?

2.113. We have engaged with stakeholders representing ex-armed service personnel and the White Paper makes proposals to review the existing pathway for this group. Our broad proposals for a trauma informed service and changes to local connection will benefit this group, as will our commitment to review the current pathway.

Human Rights and UN Conventions¹²⁵

2.114. The European Convention on Human Rights (“the ECHR”) protects basic human rights and freedoms as set out in its 14 articles. It protects the right to liberty and security (Article 5) and the right to a fair trial, including in the determination of civil rights and obligations (Article 6), and prohibits discrimination (Article 14). The ECHR is incorporated into UK law by the Human Rights Act 1998.

¹²⁴ [Households found to be eligible for assistance, unintentionally homeless and in priority need during the year: Categories of priority need by type of household \(section 75\) \(gov.wales\)](#)

¹²⁵ [Universal Declaration of Human Rights | United Nations](#)

2.115. The Welsh Ministers cannot act in a way that is incompatible with any of the Convention rights by virtue of section 81 of the Government of Wales Act 2006.

2.116. Our initial assessment is that the proposals are compatible with Convention rights and do not have a negative impact on people's human rights.

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative Impacts?
Article 2 Right to Life	The proposed reforms aim to facilitate a transition toward rapid rehousing, implementing a more preventative approach to homelessness. Preventing homelessness from the earliest possible point will help to mitigate the impacts that homelessness has on general and physical health. Wider public service duties can also address issues related to death among the homeless population such as poor general and mental health and substance misuse.	Homelessness can be linked to deaths at an early age according to data reported by the Office of National Statistics (ONS). According to these figures, an estimated 741 deaths of homeless people were registered in England and Wales in 2021 and the highest number of estimated deaths were seen in men aged 45 to 49 years and women aged 40 to 44 years. Additionally, around 259 registered deaths of homeless people were related to drugs, accounting for 35.0% of all estimated deaths. Alcohol-specific	Proposed reforms aim to help those with the most complex needs find suitable accommodation through a multi-disciplinary approach. By working towards addressing issues around homelessness such as health, the Welsh Government aims to improve stability, safety and life itself for those who are homeless or at risk of homelessness as these measures would reduce early death and extend life span.

		causes accounted for 9.6% (71 deaths) and suicide accounted for 13.4% (99 deaths) of estimated deaths. Overall, these three causes were found to account for around 57.9% of homeless deaths registered in 2021, which was consistent with previous years. This demonstrates a link between poor mental health, substance abuse and homeless deaths.¹²⁶	
Article 8 The right to respect for private and family life and correspondence	The Welsh Government aims to ensure that people can access and retain accommodation that suits their needs in order to achieve a better quality of life and improved personal and/or family safety, privacy and security. We have long recognised that	A lack of adequate living conditions can interfere with an individual's right to a private and family life. Housing is critical to many other aspects of an individual's private and family life, including physical and mental health, quality of life, access to	The Welsh Government will monitor the impacts of the proposals through consultation and implementation stages for potential issues or emerging risks in case any revisions are necessary. This work will take place alongside

¹²⁶ [Deaths of homeless people in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/deaths/articles/deaths-of-homeless-people-in-england-and-wales)

	homelessness cannot be prevented through housing alone and that all public services and the third sector have a role to play in ending it. By widening responsibility for preventing homelessness, we create an opportunity to prevent the wider disadvantage, trauma and disruption that homelessness can cause. In so doing, we have an opportunity to improve individual wellbeing and life chances, lower health risks and increase life expectancy.	education and economic outcomes. Therefore, safe, stable, and affordable housing is a necessity to achieving many other human rights, including security and safety. ¹²⁷	parallel policy work related to housing adequacy and affordability.
Article 14 Prohibition of Discrimination in respect of	The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on	Individuals with protected characteristics have been found to experience additional	The proposed reforms will consider how housing services can adapt a more person-centred

¹²⁷ Naming Housing as a Human Right Is a First Step to Solving the Housing Crisis | Housing Matters (urban.org)

these rights and freedoms	any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.	challenges associated with homelessness. Tai Pawb identified these as including difficulty experienced in having their situation resolved or understood, barriers to self-advocating, lack of information needed to help their situation be better understood or managed and reliance on external agencies for support in resolving their issues.¹²⁸	approach to provision of support. The proposals consider adding further nuance to the local connection test to ensure that this does not disadvantage protected groups and that different types of support networks and local links are considered. We aim to make the entire system more accessible.

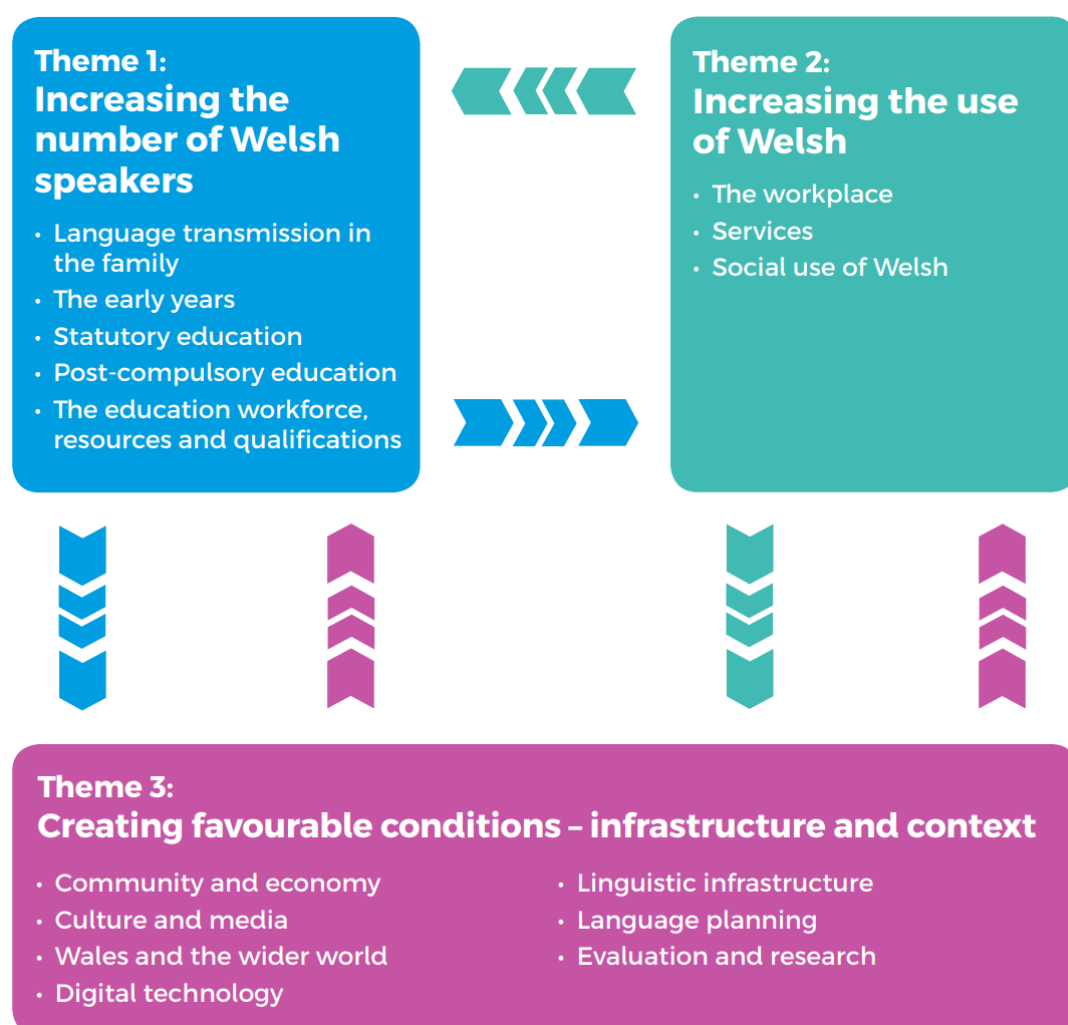
¹²⁸ [Experiences-of-homelessness-Final-Version-PDF.pdf \(taipawb.org\)](https://taipawb.org/experiences-of-homelessness-final-version-pdf)

C. WELSH LANGUAGE IMPACT ASSESSMENT

Cymraeg 2050 is our national strategy for increasing the number of Welsh speakers to a million by 2050.

The Welsh Government is fully committed to the new strategy, with the target of a million speakers included in its Programme for Government. A thriving Welsh language is also included in one of the 7 well-being goals in the Well-being of Future Generations (Wales) Act 2015.

We also have a statutory obligation to fully consider the effects of our work on the Welsh Language. This means that any Welsh Government policy should consider how our policies affect the language and those who speak it. The [Cymraeg 2050 strategy](#) has three interrelated themes:



The headings under each theme outline the scope of activities that can affect the language.

As a general rule, if your policy has the potential to impact on people, it will impact in some way on Welsh speakers and therefore on the Welsh language.

- 1. Welsh Language Impact Assessment reference number: 04/09/2023**
- 2. Does the proposal demonstrate a clear link with the Welsh Government's strategy for the Welsh language? – [Cymraeg 2050 A million Welsh speakers](#) and the related Work Programme for 2021-2026? [Cymraeg 2050 work programme 2021-2026](#)**

2.1. The Welsh Government's strategy for the Welsh language Cymraeg 2050 A million Welsh speakers outlines the importance of sustaining and growing communities with high numbers of Welsh speakers.¹²⁹ There are links to the proposal in this sense as the movement of people both into and from these communities can have an impact on the number of Welsh speakers.

2.2. Additionally, Section 4 of the Well-being of Future Generations (Wales) Act 2015.¹³⁰ highlights the creation of a vibrant culture and thriving Welsh language as one of seven well-being goals. As this involves the ability for people to participate in culturally enriching activities, factors such as the placement of Welsh speakers in proximity to facilities such as Welsh language schools may be something to consider.

2.3. Also, the strategy includes the vision of normalising the Welsh language in as many aspects of life as possible. This includes offering Welsh and English service provision and providing bilingual guidance and training for all service staff.

¹²⁹ [Cymraeg 2050: A million Welsh speakers \(gov.wales\)](#)

¹³⁰ [WFG Act Statutory Guidance \(gov.wales\)](#)

3. Describe and explain the impact of the proposal on the Welsh language and explain how you will address these impacts in order to improve outcomes for the Welsh language. How will the proposal affect Welsh speakers of all ages (both positive and/or adverse effects)? You should note your responses to the following in your answer to this question, along with any other relevant information:

3.1. The highest estimated numbers of Welsh speakers are in Cardiff (96,800), Gwynedd (91,800) and Carmarthenshire (87,500) according to Welsh language data from the Annual Population Survey (April 2022 – March 2023).¹³¹ It is important to ensure that proposals put forward by the Welsh Government do not alienate these Welsh speaking communities. For those who use Welsh as their first language, information on how they can access support and communication with housing and homelessness staff should be available in Welsh as well as English. Also, the Welsh Government's strategy for the Welsh language aims to promote and facilitate provision of bilingual services in order to increase the range of services offered to Welsh speakers, and to see an increase in use of Welsh-language services. All materials will be available in Welsh and English, and all guidance and training materials for housing and homelessness staff will be bilingual. All materials will be accessible.

3.2. The proposal to provide more flexibility around local connection could potentially have a negative impact on the protection of the Welsh speaking communities. In some cases, people may need to be moved to a different local authority area for their own safety and wellbeing e.g. people fleeing from domestic abuse etc. Movement of Welsh speakers out of their local authority area could have an impact on the frequency at which they use the language, which would be detrimental to their long-term retention and have a negative effect on the continuation of the use of Welsh in future generations. However, all public services across Wales are available bilingually, therefore movement of Welsh speakers out of their local authority area should not restrict their ability to have access to Welsh language provision and services such as health care and education.

3.3. Additionally, local authorities should promote the Welsh language to support Welsh-speakers and non-Welsh speakers to integrate into communities across Wales. As part of Cymraeg 2050, to increase the number of speakers, early education provision (including Mudiad Meithrin, Flying Start, Seren a Sparc, Education Begins at Home) will play a vital part in increasing opportunities for

¹³¹ [Welsh language data from the Annual Population Survey: April 2022 to March 2023 | GOV.WALES](#)

Welsh speakers and non-Welsh speakers to have access to use and hear the Welsh language.

3.4. The Welsh language strategy mentions retaining young Welsh speakers in Welsh speaking communities as a goal as this promotes the continuation of the Welsh language into future generations. Movement of young people out of Welsh speaking areas in order to attend university or have better access to infrastructure such as transport links is highlighted as a potential threat to this goal. However, homelessness could also present a risk as the young person may be moved to a different local authority area as a result of threats to wellbeing, a lack of suitable/affordable housing or to be in closer proximity to support systems. To address this risk, local authority teams will be able to share information regarding Welsh medium education and services available in their area/community.

3.5. The introduction of non-Welsh speakers into Welsh-speaking communities, could potentially dilute the use of the Welsh language in those areas. However, under the Welsh language strategy section on integration, the movement of non-Welsh speakers into Wales is viewed as an opportunity.¹³² As part of the Welsh Language Communities Housing Plan, a Cultural Ambassadors Course will be available to all communities. The aim of this course is to support Welsh-speaking communities to welcome and help non-Welsh speakers moving into the community to integrate and feel part of the community and thus support the Cymraeg 2050 aim of reaching a million Welsh speakers.

3.6. *'A society that promotes and protects culture, heritage and the Welsh language and which encourages people to participate in the arts and sports and recreation'* is outlined as a goal in the Well-being of Future Generations (Wales) Act 2015.¹³³ There are a range of activities and programmes that promote Welsh culture, heritage and language that are free to access or offer free access for low income or disadvantaged families. This includes the Urdd Eisteddfod, the National Eisteddfod, Amgueddfa Cymru, Local Authority libraries, museums and archives and Welsh Government funded programmes such as the Fusion programme.¹³⁴

3.7. In addition, there are a number of events during the year such as Open Doors that offers free access to CADW historic buildings, castles etc. across Wales. In many cases, individuals who are homeless or at risk of becoming homeless may not

¹³² [Cymraeg 2050: A million Welsh speakers \(gov.wales\) page 68](#)

¹³³ [Well-being of Future Generations \(Wales\) Act 2015: the essentials \[HTML\] | GOV.WALES](#)

¹³⁴ [Fusion programme \(culture improving lives\) | GOV.WALES](#)

be able to participate in cultural activities as a result of poor mental and/or physical health relating to their housing circumstance and having to prioritise housing need over other aspects of life. The aim of the proposed reforms to ensure that homelessness is rare, brief and unrepeatable will have a positive impact in this regard as it means that more people will have stable home environments that are conducive to participating in personal and cultural development activities.

3.8. Is it important that Welsh speaking staff, especially within health care settings such as the mental health and housing services that support is offered. We are aware of the importance of offering Welsh language services as CAB has highlighted in their recent research that services through the medium of Welsh is not just about a preference. We also know that many Welsh speakers feel more comfortable expressing themselves in Welsh, feel more confident communicating their needs in Welsh, think and live their lives in Welsh. It can be argued therefore that when services are not available in Welsh; this is a failure to meet a basic requirement. This is especially the case in some service contexts or where consumers are vulnerable. Feeling able to express yourself and being comfortable and confident in communicating with a service provider is vital.¹³⁵

3.9. We will ensure that Welsh language provision is available, that bilingual guidance and learning is provided for housing service staff and that the topic of perceived impacts of proposals on the Welsh language is raised during the consultation process.

3.10. The Homelessness Prevention Legislation Team will maintain communication with colleagues in Welsh Language Division in order to anticipate and mitigate issues that pose a risk to the goals set out in Welsh language strategy or may be detrimental to the protection of Welsh speaking communities.

¹³⁵ [English by default – Understanding the use and non-use of Welsh language services - Citizens Advice](#)



Welsh Government
Consultation on the White Paper on Ending
Homelessness in Wales

Draft Regulatory Impact Assessment

Date of issue: 10 October 2023
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Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Contents

1. Regulatory Impact Assessment (RIA) Summary	3
Current funding of homelessness services in Wales	4
Relevant grant schemes	4
Summary of costs and benefits	7
2. Reform of existing core homelessness legislation	9
The three tests: priority need, intentionality and local connection.....	11
The role of the Welsh public service in preventing homelessness.....	18
3. Targeted proposals to prevent homelessness for those disproportionately affected by homelessness.....	23
Children, young people and care experienced young people	23
Survivors of violence against women, domestic abuse and sexual violence	28
People with complex health needs, including mental ill health, substance misuse and those leaving hospital	31
People involved with the Criminal Justice System	33
4. Access to accommodation.....	46
Suitability and Temporary Accommodation	46
Allocation of social housing	58
Additional housing options for discharge of the main homelessness duty	65
5. Implementation of the proposed reforms.....	69
Post implementation review	70

1. Regulatory Impact Assessment (RIA) Summary

1.1. The Welsh Government Programme for Government 2021 – 2026, as part of the co-operation agreement with Plaid Cymru, committed to a fundamental reform of homelessness services, to focus on prevention and rapid re-housing, through the introduction of a package of proposed reforms to create significant change to our homelessness and housing system.

1.2. Work to develop the White Paper has been informed by an Expert Review Panel who have been tasked by the Minister for Climate Change to consider how legal reform could support work to end homelessness in Wales.¹ Separate engagement has also been undertaken with representatives from local authorities, housing associations, wider public services and people with lived experience of homelessness.²

1.3. Four working principles underpin the proposed reforms, which are the following:

- Homelessness should be rare, brief and unrepeatable.
- The reforms will facilitate service delivery that is trauma informed and person-centred.
- The reforms will support the Welsh Government long term policy aim of Rapid Rehousing.
- The reforms will ensure preventing homelessness is the responsibility of the entire Welsh public service.

1.4. This RIA provides an initial estimate of costs and benefits made against the proposals in the White Paper. As a working, draft document, we expect the RIA to change through the proposed legislative process and during the consultation period of the White Paper between October 2023 and January 2024, and hope to gather further evidence and information. We will publish a full RIA to accompany any proposed Bill, drawing on evidence emerging from this consultation and other relevant sources to provide a more detailed assessment of impact.

1.5. Although the RIA has not offered specific costs at this early stage for all elements contained in the White Paper, we expect that implementation of the reforms will require significant investment. This has been demonstrated through the response to the pandemic, which led to record investment in homelessness prevention and housing support services by the Welsh Government, which despite the challenging budgetary environment, has been maintained since. The no one left out approach adopted in 2020 surfaced much of the unmet support needs and additional need for homelessness assistance the reforms set out in the White Paper seek to address.

1.6. Whilst the current financial climate remains extremely challenging for Welsh public services, the destabilising impact on individuals and families, and cost to wider public services of homelessness, mean taking no action, will only exacerbate the current pressures and costs in the system. In order to reduce the rising numbers of people presenting as homeless, we have to transform the system to ensure earlier intervention and a wider public service response to prevent homelessness. The

¹ [Wales Expert Review Panel \(crisis.org.uk\)](https://crisis.org.uk)

² [Understanding the experiences of homelessness - Tai Pawb](#)

evidence from the Expert Review Panel is clear that resourcing these initial steps will help in reducing longer term spend as well as demand on homelessness services.

1.7. In addition to gathering evidence through the consultation exercise and to establish the costs and benefits of the proposals in the White Paper, the following additional work will be undertaken:

- An internal review of the initial estimate of costs and benefits with the Welsh Government's Knowledge and Analytical Service.
- External commissioned work if evidence cannot be obtained by Welsh Government officials.
- Establishment of an internal Welsh Government working group to obtain and evaluate relevant costs and benefits.
- Further testing and data gathering with local housing authorities and the wider housings sector partners.

1.8. This RIA examines the proposals in the White Paper requiring primary legislation and should be read alongside that document. No consideration has been given in the RIA to the costs and benefits emerging from non-legislative measures referenced in the White Paper. This has been done in order to focus on the White Paper legislative proposals and recommendations from our Expert Review Panel, rather than linked policy and practice which support the reforms.

1.9. By structuring our draft RIA to analyse the costs and benefits of each individual legislative proposal, we aim to provide comprehensive and nuanced evaluation.

1.10. We remain open to considering additional options identified by stakeholders during the consultation period. For this version of the RIA, we have considered two options, which are:

- Business as usual; or
- Use of legislation to deliver the proposals.

Current funding of homelessness services in Wales

1.11. Funding of local housing authority homelessness services are currently met through two main sources of funding. These are:

- direct Welsh Government funding provided through different grant schemes and;
- the un-hypothecated Revenue Support Grant (RSG) provided by the Welsh Government to local authorities.³

Relevant grant schemes

1.12. The current Housing Support Grant (HSG) is the largest direct grant scheme to local housing authorities and supports activity which prevents people from becoming homeless, stabilises their housing situation, or helps people at risk of experiencing homelessness to find and keep accommodation. The HSG does not fund the

³ Un-hypothecated is something which is not linked to any specific scheme or initiative and in the context of the RSG can be used at the discretion of a local authority.

statutory functions of a local housing authority to prevent homelessness, it instead supports statutory services to help people into the right homes with the right support to succeed. It may also be used to assist people to address problems they face, such as debt, employment, tenancy management, substance use issues, violence against women, domestic abuse and sexual violence, and mental ill health.⁴ An indicative three-year funding budget for HSG from 2021/22 to 2023/24 was set at £166.7m.

1.13. In addition to the HSG the following funding was provided for financial year 2022-23:

- £14.66m, through the Homelessness Prevention Programme Grant (HPG) to support statutory and third sector organisations to deliver front line services to prevent homelessness.
- £20m in 'No one left out' funding, to ensure that local authorities are able to maintain the 'no-one left out' approach to support temporary accommodation and 'move-on'.
- £6m, in Discretionary Homelessness Prevention funding, to top-up the discretionary homelessness prevention funds that most local authorities currently utilise within their local areas to prevent and relieve homelessness.
- £1.58m to fund co-ordinator roles within local authorities, to both lead on the homelessness transformation agenda within local authorities, and to convene partners to identify and respond to opportunities to improve outcomes through collaboration and integration.

1.14. A record of net current expenditure by Welsh local authorities is available through a data collection process managed by the Welsh Government.⁵ Costs for homelessness services are accounted for in two key returns represented as 'Homelessness' and 'Supporting People', these costs are represented in Table 1 below.

1.15. The net expenditure across all local authorities for 'Homelessness' and 'Supporting People' during 2021/22 was £32m and £111m respectively.⁶ These sums represent all sources of funding on services, including specific grants (such as HSG) and council tax. The RSG contribution is not accounted for directly, due to its un-hypothecated nature, but it is possible to remove specific grant contributions, though council tax funding would remain. For 2021/22, £9.8m of the £32m 'Homelessness' funding came from specific grants, indicating that £22.5m was made up of RSG and/or council tax. Almost all of the 'Supporting people' funding (£111m) came from specific grants.

⁴ [housing support grant practice guidance](#)

⁵ [Data collection: Revenue outturn | GOV.WALES](#)

⁶ Supporting People was a Welsh Government funded programme established to help local housing authorities prevent homelessness. It merged with two other grant schemes to become the HSG. The Supporting People category within the RSG is likely to be a legacy of these arrangements.

Table 1: Net current expenditure by Welsh local authorities (£000s)

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
Homelessness	14,239	12,760	17,109	21,566	23,269	27,782	32,346
Homelessness without specific grants	9,314	8,730	11,873	17,452	18,170	20,908	22,536
Supporting People	85,873	85,568	85,809	83,567	87,204	88,264	111,916
Supporting people without specific grants	4,476	4,781	5,477	2,977	4,320	2,510	660

1.16. The budgeted revenue expenditure for local authorities is expected to increase funding to Homelessness to £44m in 2022/23 and to reach £70m in 2023/24, with Supporting People funding estimated to reduce in 2022/23 to £101m before returning to £110m in 2023/24.⁷

⁷ [Budgeted revenue expenditure by authority and service \(gov.wales\)](https://gov.wales/budgeted-revenue-expenditure-by-authority-and-service)

Summary of costs and benefits

1.17. We have assessed options against the estimated cost to local housing authorities for homelessness services during 2022/23.

Table 2: Estimated cost to local housing authorities for homelessness services during 2022/23

Outcome type	Household no.
£428.40 per “ineligible” applicants	438
£214.20 per applicant considered as “not homeless”	3,621
£1,112 per applicant eligible to assistance in accordance with the prevention duty (Section 66)	9,246
£2,274 per applicant Eligible, homeless, subject to duty to help to secure (Section 73)	12,537
£2,274 per applicant who may be considered as “eligible, homeless, in priority need and unintentionally homeless” (Section 75)	5,094

1.18. Option 1 (business as usual) gives rise to no additional costs. It establishes the baseline costs of current provision under the Housing (Wales) Act 2014. There are no benefits associated with this option because it does not address any of the shortcomings that we have identified with current legislation.

1.19. Under option 2 (the proposal), we anticipate there to be additional annual costs to the recurring baseline established under option 1. While we acknowledge that our data is limited in its current scope, we can draw valuable insights from previous studies and similar policy implementations:

- In 2020, Welsh Government commissioned Cardiff University, Alma Economics, Cardiff Metropolitan University, Glyndwr University, Heriot-Watt University and independent consultants Tamsin Stirling and Tim Gray, to undertake a study into the potential future options for the Priority Need test in Wales. On the basis of abolishing the Priority Need test in Wales alone, it estimated an additional cost of approximately £3million by 2028/29.⁸
- We have also considered the findings from the Evaluation of the Implementation of the Homelessness Reduction Act: Final Report.⁹ Most of the additional expenditure reported by the case study local authorities represent an ongoing rather than one-off cost. These include:
 - Additional staff and training requirements.
 - Additional administration and processes required per case.
 - Increasing proportion of service users with more complex needs.
 As such we would anticipate additional costs to local authorities both to the statutory homelessness provision funded via the Revenue Support Grant and to the housing support services funded via the Housing Support Grant.
- A key recommendation of the evaluation report concerns building more flexibility into the requirements of the Act and associated guidance, to

⁸ [Review of priority need in Wales: summary | GOV.WALES](#)

⁹ [Evaluation of the Implementation of the Homelessness Reduction Act: Final Report](#)

reduce the perceived administrative burden on local authorities. At this early stage of policy development, we encourage all stakeholders to share their perspectives and recommendations to ensure that the proposals are both practical and accommodating of diverse circumstances.

1.20. Option 2 gives rise to a number of on-going benefits:

- Early and more effective prevention is expected to reduce the size of the statutory main duty caseloads, and it is assumed that prevention cases have a lower cost than main duty cases.¹⁰
- Price Waterhouse Cooper has estimated savings related to preventing homelessness at between £3,000 to £19,500 per person, per year compared to allowing homelessness to persist for 12 months. On average, preventing homelessness for one year resulted in a reduction in public expenditure of £9,266 per person.
- The same research also suggests that for every £1 invested in solutions to move people directly out of homelessness, £2.80 is generated in benefits.¹¹ Based on the number of people currently experiencing homelessness in temporary accommodation in Wales, this provides potential savings in the longer term in the range of between £32 and £212 million and, based on the average saving related to homelessness prevention, a potential saving of around £100 million.

1.21. The RIA will now assess the relevant costs and benefits (where available) in connection with the White Paper proposals. We have conducted an assessment for the majority of proposals; however, in a few cases, we have not, but we will consider them further during development of the RIA. This is done by considering two options of business as usual (option 1) and the proposal from the White Paper (option 2).

¹⁰ [New burdens assessment pro forma](#)

¹¹ [Housing and Health: A Case for Investment](#)

2. Reform of existing core homelessness legislation

1. A person is threatened with homelessness if it is likely that the person will become homeless within six months, or they have been issued with a Notice Seeking Possession.

Option 1.1: business as usual

2.1. This option would continue the current provision of the Housing (Wales) Act 2014 [“the HWA 2014”] that means someone considered to be threatened with homelessness within 56 days is eligible to receive assistance to prevent homelessness occurring.

2.2. Estimates within the Explanatory Memorandum for the HWA 2014 calculated costs to local authorities providing homelessness services to applicants for the 2015-16 period. These costs, shown in Table 2, above, have been up rated to reflect inflation during the intervening period and are used in this draft RIA to estimate the cost a local authority might incur for those who seek homelessness assistance. We will review these estimates again for the RIA accompanying the Explanatory Memorandum for the proposed Bill.

2.3. Statutory data recorded 9,228 household outcomes in the 2021/22 period, which would represent expenditure of £10.3m to Welsh local housing authorities providing assistance through the prevention duty.¹²

Option 1.2: the proposal

Costs

2.4. Drawing on the same data used above and assuming the proposed changes lead to more prevention assistance being provided, three ranges of costs are used against the 2021/22 household outcomes: an increase in assistance of 5% (9,689 households), 15% (10,612 households) and 30% (11,916 households). Additional costs resulting from this estimate could lead to expenditure of £10.8m (5%), £11.3m (10%) and £13.3m (30%) to homelessness services.

Benefits

2.5. This estimate of costs does not reflect the benefits of more preventative action which we anticipate will lead to homelessness being avoided. This impact would lead to significant savings due to the higher costs of meeting the current interim and main duties to relieve homelessness.

2.6. This option will enable preventative action to be taken sooner and (combining benefits from the complementary proposals on the duty to identify, refer and co-operate) will mean that potential indicators of homelessness will be identified earlier, leading to an offer of specialist preventative support which is more likely to be successful.

¹² [Households for which assistance has been provided \(gov.wales\)](https://gov.wales/households-which-assistance-has-been-provided)

2. A duty for a local housing authority to:

- **draw up a personal housing plan containing the steps that it will take to secure accommodation for the applicant;**
- **review the needs assessment and personal housing plan with the applicant within a defined timescale of 8 weeks; and**
- **include an applicant's views on their accommodation needs in a personal housing plan.**

Option 2.1: business as usual (to not take the proposal forward)

2.7. This option would retain the current position whereby a local housing authority must help to secure that suitable accommodation is available or does not cease to be available for occupation by an applicant, by being required to take reasonable steps to help, having regard to the authority's resources, alongside a duty to assess a person at risk of homelessness. Completion of a personal housing plan would remain good practice but not be required. The costs would be those relevant to section 66, as set out in Proposal 1.

Option 2.2: the proposal

Costs

2.8. This option will place greater demands on a local housing authority when attempting to prevent homelessness, or in seeking to provide accommodation to an applicant, who is or is at risk of being homeless. The costs of undertaking a personal housing plan were estimated within an assessment of the Homelessness Reduction Act 2017, carried out by the UK Government.¹³ This found that two hours would be required to undertake an individual's assessment of need and the drafting of a personal housing plan. Officers undertaking this role would typically be employed with staffing costs of £43,000/year, or £22/hour.

2.9. We do not dispute the UK Government's calculation of costs but cannot yet extend that to arrangements for Welsh local housing authorities. Existing Welsh Government guidance promotes the use of personal housing plans, and a number of local housing authorities provide them to applicants, though this service is not offered universally.¹⁴ The UK Government's assessment was based on new burdens being placed on English local authorities, suggesting a move from little or no expenditure to the full costs associated with the new requirements placed upon them to provide a personal housing plan. Estimating the costs of a personal housing plan for Welsh local housing authorities is therefore problematic as current homelessness provision may already include elements of this work.

2.10. Assuming that the combined number of applicants eligible for assistance through sections 73 (the relief duty) and 75 (the main duty) during 2022/23 (17,631 applicants) were provided with a personal housing plan, UK Government's estimates suggest that completion of these plans may cost Welsh local housing authorities £694,716. However, this sum risks double-counting costs already captured in processing an application.

¹³ [New burden assessment pro forma](#)

¹⁴ [for Local Authorities on the Allocation of Accommodation and Homelessness](#)

2.11. Due to the current uncertainty associated with this element of the reforms we will consult further with local authority colleagues to provide a more reliable estimate for the future RIA.

Benefits

2.12. Benefits are likely to result from the more person-centred nature of the service delivered via a personal housing plan, which we envisage will result in more effective and engaged steps to prevent an individual's homelessness. The particular requirement to include an applicant's views on their accommodation needs in a personal housing plan will further strengthen that relationship.

[See also consideration of care leavers in Proposal 14]

The three tests: priority need, intentionality and local connection

3. Abolishing priority need and intentionality tests.

Option 3.1: business as usual

2.13. We suggest that continuing business as usual in relation to the priority need and intentionality tests would make relatively little practical difference when compared to the proposal outlined in Option 3.2. The Homelessness (Priority Need and Intentionality) (Wales) Regulations 2022 amended section 70 of the HWA 2014 extending the application of both tests to people who are street homeless, the largest group of people who were previously excluded from assistance. However, the retention of both tests would be inconsistent with the key principle behind our proposed reforms; to facilitate service delivery that is trauma informed and person-centred.

Option 3.2: The proposal

Costs

2.14. The Homelessness (Priority Need and Intentionality) (Wales) Regulations 2022 were accompanied by an Explanatory Memorandum which included a RIA, outlining the costs and benefits of the changes it brought about. Estimates of costs were outlined based on assumptions of three ranges of growth of 1.5%, 3% and 6% in service use for the period 2021/22 to 2025/26. The RIA suggested that the differences resulting would range from £30,377,036 in 2021/2022 to £32,241,078 by 2025/2026, based on a 1.5% increase, to an increase of £31,723,801 in 2021/2022 rising to £40,050,568 by 2025/2026, based on the 6% rate.

2.15. This estimate was caveated by distinguishing between different local authority areas, for whom the impact would be distributed differently, for example, urban against rural areas. Other relevant factors noted include the cost-of-living, migration and rent increases versus potential mitigation of pandemic/public health concerns reducing, various housing interventions like Housing First, Rapid Rehousing and capital investments in one-bedroom homes making progress.

2.16. StatsWales data suggests that intentionality decisions have been the reason for ending a duty in an average of 100 cases per year over the last five years. These numbers are relatively low when compared to the average number of total outcomes which is just under 30,000 per year. However, application of these decisions varies greatly across local authorities and decisions have been decreasing since 2018. Regardless of how low the current figures are, preventing the use of the intentionality test will increase the number of cases where the main duty is accepted and this will increase costs for local authorities.

2.17. We have also considered analysis commissioned by Welsh Government in 2020 assessing potential future options for the Priority Need Test in Wales. The analysis was based on data provided by 14 out of the 22 local authorities in Wales as well as official statistics available on StatsWales. The study estimated the anticipated costs and benefits of abolishing the Priority Need Test over a five- and ten-year period, for all groups. The additional cost for covering additional demand for temporary accommodation is estimated to cost approximately £3million by 2028/29, if rolled out for all homelessness applicants.¹⁵

2.18. We should also note the considerable savings that are expected to flow from reduced use of outreach services and reduced use of wider services (physical and mental health, substance misuse, and criminal justice) by both rough sleepers and other homeless households. Based on assumptions set out in the report by Price Waterhouse Cooper (2018 Assessing the costs and benefits of Crisis' plan to end homelessness). Savings after five years in 2028/29 will rise to approximately £9 million.

Benefits

2.19. This option will enable the Welsh Government to bring forward reforms which facilitate service delivery that is trauma informed and person-centred. It will also sustain the current practice adopted at the beginning of the pandemic in April 2020, wherein the Welsh Government provided additional guidance and funding to local authorities to ensure everyone who presented to homelessness services without accommodation, were provided with the accommodation and support they needed to stay safe.

4. Discretionary Local Connection test to remain but with expanded list of groups/circumstances to whom test should not apply.

Option 4.1: business as usual

2.20. Calculating the costs associated with the current application of the local connection test is challenging as the Welsh Government does not collect data on its use. The local connection test is a legal power available to a local housing authority, which can be used at its discretion, as such, we understand that there is variation in how it is used across Wales.¹⁶ In its current form, the local connection test is considered by local housing authorities as being vital in prioritising homelessness services to the needs of existing residents of an area. This is particularly important for areas with high demand for accommodation, such as larger towns and cities.

¹⁵ [Review of priority need in Wales: summary | GOV.WALES](#)

¹⁶ [No One Left Out Report 2021 \(crisis.org.uk\)](#)

Option 4.2: The proposal

Costs

2.21. As with Option 4.1, calculating the costs associated with this proposed option are difficult to estimate due to the limited available data. We consider that the option could result in a changed distribution of demand on services, with applicants currently de-prioritised when applying for services, because they lack a local connection, being offered assistance sooner. Potentially, this distribution could affect areas of higher housing demand, though the proposed beneficiaries, such as people subject to abuse or exploitation, may face that in any community and could equally be moving from a city to rural area as the alternative route.

2.22. Significant changes to the local connection test were introduced in Scotland in November 2022. These changes go further than our proposals, however we will carefully monitor the data of the Scottish Government in order to ensure the Scottish experience informs our policy development. Anecdotally, we understand the numbers of people choosing to leave their local area remains small but there is some emerging evidence pertaining to the pressure on support services and social work in meeting the needs of people moving between authorities.

Benefits

2.23. We consider that the changes to the application of the local connection test will complement the trauma-informed and person-centred approaches we hope to see delivered by local housing authorities.

5. A statutory duty to provide support in order to help an applicant retain accommodation.

Option 5.1: business as usual

2.24. A local housing authority is expected to provide a range of services to prevent homelessness, which will include efforts to help a person retain the occupation contract for their home (although this is not currently a legal duty). Welsh Government guidance and other literature outline examples which a local housing authority should consider when fulfilling its prevention duty, linked to occupation contract sustainment.^{17 18}

2.25. More direct assistance and funding is provided through the HSG, linked to debt, employment and tenancy management.¹⁹ Activities in connection with tenancy sustainment are not recorded in detail as part of grant funding arrangements, making it difficult to assess what proportion of the current funding (£166.7m) is used on this matter. A local housing authority will also have access to additional in-year funding through a Discretionary Homelessness Prevention grant, which in 2022-23 amounted to £6m.

¹⁷ [for Local Authorities on the Allocation of Accommodation and Homelessness](#)

¹⁸ [Working together to end homelessness from social housing](#)

¹⁹ [Housing Support Grant Practice Guidance](#)

Option 5.2: The proposal

Costs

2.26. This proposal ensures that, for those who need it, support remains on offer beyond discharge of the main homelessness duty and therefore extends and expands the role of local housing authorities. We anticipate that the main burden of this proposal will fall upon a local housing authority, however, the costs associated with this option link to the wider duty to co-operate (option 11) and the bodies listed under that option would also be expected to apply appropriate resources as part of their responsibilities to an applicant. It is our expectation these resources would be those ordinarily offered to individuals within their caseload, rather than new actions required of the relevant bodies.

2.27. Additional resource will be required for local housing authorities to fund staff to undertake the additional work to help sustain a person's occupation contract. Given that the HSG can already be used towards tenancy sustainment the gap between current demand and that which may result from this option is unclear. Statutory data confirms the main reasons for households being threatened with homelessness and will give an indication of likely demand.²⁰ However, further engagement is likely to be necessary with local housing authorities to understand possible pressures.

Benefits

2.28. This option represents a significant plank of the legislative reforms in preventing people from becoming homeless. In almost all circumstances, maintaining accommodation is vital for the well-being of households and the impacts can extend significantly further on local communities and public services when a tenancy fails.

6. Removal of the "relief duty" (section 73 of the HWA 2014).

Option 6.1: business as usual

2.29. This option would reflect the costs illustrated in Table 2 (Estimated cost to local housing authorities from homelessness services during 2022/23) through the retention of section 73. This would suggest that the current costs incurred by local housing authorities for homelessness services are £10.3m under section 66, £28.5m under section 73 and £11.6m under section 75.

2.30. As a further illustration of costs, Table 3 below records the variety of temporary and permanent accommodation projects funded by the HSG.

²⁰ [Households found to be threatened with homelessness during the year](#)

Table 3: HSG funding for accommodation projects

Project Type	Project Type Breakdown	Client Units (numbers)	Spend against Project Type (£)	Spend per Unit (£)
Temporary Supported Accommodation	Learning disability	54	445,825	8,256
	Physical impairment	23	60,662	2,637
	Mental health	424	5,679,916	13,396
	Substance misuse and/or alcohol issues (Wet accommodation)	119	1,589,850	13,360
	Substance misuse and/or alcohol issues (Dry accommodation)	168	2,484,499	14,788
	Ex-offenders	86	1,005,511	11,691
	Young people	1,071	14,195,300	13,254
	Older people	0	0.00	0.00
	Refugees	0	0.00	0.00
	VAWDASV	55	492,788	8,959
	Generic	1,594	12,315,315	7,726
	Generic - intensive needs	77	1,086,738	14,113
	Other	163	1,837,416	11,272
	TOTAL	3,834	41,193,824	
Permanent Supported Accommodation	Older people	3,699	2,261,449	611
	Learning disability	2,270	25,095,142	11,055
	Mental Health	221	2,377,677	10,758
	Other	169	1,454,209	8,604
	TOTAL	6,359	31,188,478	

Option 6.2: The proposal

Costs

2.31. The main benefit of this change is to simplify the homelessness system and this change is likely to be felt most by local housing authorities who deliver services in line with the law. A basic calculation of the costs of this proposal would combine those associated with the relief duty and the main duty, coming to £35.9m. Savings through efficiencies caused by a simpler process for a local housing authority to follow are likely to be marginal and linked to reduced bureaucracy and notification requirements.

Benefits

2.32. The benefits of the proposal are likely to reflect the clarity provided to applicants of the assistance offered to them. A simplified process may also benefit local housing authority officers, required to undertake fewer assessments and issue fewer notifications. Although the financial savings may only be marginal, a more straightforward set of arrangements could improve the working relationships between local housing authority officers and applicants and their respective well-being.

2.33. We will set out more detail of the costs and benefits of this proposal in the later version of this RIA.

7. The unreasonable failure to co-operate test.

Option 7.1: business as usual

2.34. Statutory data collected from local housing authorities shows the number of households for which assistance has been provided by outcome and household type.²¹ This includes instances in respect of assistance provided under sections 66, 73 and 75 where a household has not co-operated with a local housing authority.

2.35. These instances for the most recent recorded period in 2022/23 indicate that cases of non-cooperation are relatively low, making up between 1.3%, 3% and 2.7% of cases under the relevant duties. The associated costs from considering applications from non-cooperation, shown in Table 4, is likely to be the same as any other application.

Table 4: Number and costs of applicants who do not co-operate with a local housing authority

Outcome type	Household no.	£
£1,112 per applicant eligible to assistance in accordance with the prevention duty (Section 66)	117	130,104
£2,274 per applicant Eligible, homeless, subject to duty to help to secure (Section 73)	381	866,394
£2,274 per applicant who may be considered as “eligible, homeless, in priority need and unintentionally homeless” (Section 75)	138	313,812
Total	636	1,310,310

2.35. The instances where an application is withdrawn due to loss of contact is higher, making up 7.3%, 9% and 4.8% respectively of cases considered under the three main duties. This is illustrated in Table 5.

²¹ [Households for which assistance has been provided by outcome and household type](#)

Table 5: Number and costs of applications withdrawn due to loss of contact

Outcome type	Household no.	£
£1,112 per applicant eligible to assistance in accordance with the prevention duty (Section 66)	675	750,600
£2,274 per applicant Eligible, homeless, subject to duty to help to secure (Section 73)	1,128	2,565,072
£2,274 per applicant who may be considered as “eligible, homeless, in priority need and unintentionally homeless” (Section 75)	246	559,404
Total	2,049	3,875,076

2.36. As outlined in the White Paper, benefits of this option are considered relevant in encouraging applicants to engage with services, who might not if this power to withdraw assistance were not available to local housing authority.

Option 7.2: The proposal

Costs

2.37. We propose a narrower test which sets out limited grounds of threatening behaviour and consistent non-contact with housing options services, as a basis for ending a service due to failure to co-operate.

2.38. Data collected from local housing authorities does not distinguish precisely between different types of non-cooperation. The proposed option should reduce those recorded as not having co-operated with a local housing authority, but we currently cannot assess from that group, the applicants who exhibit threatening behaviour towards staff. It would be entirely speculative to estimate costs which could include a small or possibly much larger proportion of this group.

Benefits

2.39. We consider that the narrowing of this power will complement the trauma-informed and person-centred approaches we hope to see delivered by local housing authorities.

8. Communication between the local housing authority and the applicant.

Option 8.1: business as usual

2.40. Local housing authorities, through custom and practice will have developed methods of communicating with applicants. We understand that there is variation in the quality of those communication methods, some requiring more refinement than others. The Welsh Government lacks reliable information on the frequency that a local housing authority will review and where necessary amend its communication materials. Costs for such work may be kept in-house and represent relatively low amounts of expenditure. Alternatively, a local housing authority may choose to

contract external communication to undertake this work. We will seek to clarify these arrangements during the consultation of the White Paper.

Option 8.2: The proposal

Costs

2.41. As with option 8.1, there are uncertainties associated with the proposal to improve the method of communication and the Welsh Government would welcome feedback on preferred methods of communication. A series of steps undertaken by local authorities could be necessary to develop formal communication, requiring policy scoping and defining by a junior officer, checking and refining by a senior officer, legal review by an internal lawyer and translation. This might be added to by communications staff to design a format for communications, though this could be done by a junior officer.

2.42. Table 6 below, drawing on Welsh Government staff costs, illustrates the possible funding requirements for a specific and limited project. Such sums could vary according to complexity and the specialisms of staff and degree of engagement that could be undertaken.

Table 6: Possible costs associated with developing communication materials.

Staff costs	Annual salary plus on costs (£)	Daily cost (£)	Days required	Total (£)
EO	43,219	197	10	1,967
Grade 7	90,165	409	5	2,045
Lawyer (Grade 7)	90,165	409	5	2,045
Translation (SEO)	70,507	320	5	1,600
			Total	7,665

Benefits

2.43. Feedback provided to develop the policy proposals for this White Paper, particularly from people who are or have been homeless, is that the process of applying for assistance is complex and unclear and that the way certain decisions are communicated (in written letters, using legalistic language) can be inaccessible. We consider that the benefits of this proposal to be more accessible and transparent communication with applicants.

The role of the Welsh public service in preventing homelessness

9. Broader public service “duty to identify and refer”.

Option 9.1: business as usual

2.44. Informal arrangements to notify a local housing authority of individuals or households at risk of homelessness are not currently recorded. Housing and

homelessness departments will have relationships with key partners within key sectors such as health, welfare services and policing and probation. However, good practice in information sharing and notification of people at risk of homelessness is reliant on protocols and agreements established through goodwill. Sustaining those arrangements can be dependent on the strength of personal relationships rather than settled and consistent working arrangements.

2.45. It is difficult to attribute costs to this work, but the successful identification and then referral of a person or household at critical points can mean that a crisis is prevented, alongside the personal, societal and economic harms caused by homelessness.

Option 9.2: The proposal

2.46. This option requires listed bodies to identify and refer people who are at risk of homelessness to a local housing authority if this is likely to occur within six months. A referral will involve the collection of material capturing the person/household's contact details, agreement to be referred to a local housing authority and summary of circumstances confirming they are or at risk of becoming homeless.

Costs

2.47. In the context of social services, all local housing authorities in Wales should have established preventative arrangements with social services colleagues to safeguard people with support needs. We do not anticipate that the identification and referral requirements of an expanded duty to co-operate (currently imposed by section 95 of the HWA 2014) will add significant change to existing arrangements. As such, they could provide a template for the listed bodies to adopt when making a referral to the local housing authority. The likely burden ought to be limited.

2.48. The referral process will not require the listed body to undertake an assessment of housing needs as responsibility for this will rest with the local housing authority. The only exception to this relates to those with the highest and most complex needs, who cannot be supported in mainstream housing even with additional support. Primary responsibility for meeting the accommodation needs of these individuals should sit with health and social care organisations through residential care.

2.49. It is difficult to predict how often a referral will be made and precise comparison with England is difficult as the number of referrals is not recorded routinely. The number of listed bodies proposed by the White Paper reforms are also greater than the number captured by the Homelessness Reduction Act 2017. Nevertheless, an estimate of burden undertaken by the UK Government suggests that in the context of social services, a single referral would take 20 minutes to complete, calculated at a cost of £20.²² In that context, the UK Government found that a single referral could result in a saving of £2,780 for children's services, and between £6,150 and £14,630 for adults' services, over a six-month period, should homelessness be successfully prevented. These savings equate to between 135 referrals for children's services, and between 310 and 730 referrals for adults' services. That analysis found that the duty to refer would be cost neutral provided that the ratio of successful preventions

²² [Applying the duty to refer to social services authorities: new burdens assessment \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/624442/2017-09-27-Applying-the-duty-to-refer-to-social-services-authorities-new-burdens-assessment.pdf)

arising from a referral to total referrals is at worst 1:135 for children's services and at worst 1:310 or 1:730 for adults' services.

2.50. An additional, initial financial outlay will be required to fund the training and development programme required to ensure that relevant public service providers are provided with the knowledge and support to be able to identify individuals at risk of homelessness, take appropriate action and make the required referral.

Benefits

2.51. The identification and referral process will be a crucial preventative element of the reforms proposed by the White Paper. We have outlined in the White Paper the mental and physical harms that can be caused by homelessness. Early identification of people or households at risk of homelessness will allow appropriate interventions to be made to prevent homelessness occurring or should it happen, ensure those impacts are brief and unrepeatable.

10. A duty on providers of asylum accommodation to identify and refer successful asylum applicants becoming homeless to a local housing authority.

Option 10.1: business as usual

2.52. There are currently no costs to providers of asylum accommodation to act on the possible risk of successful asylum applicants becoming homeless.

Option 10.2: The proposal

Costs

2.53. Though our assessment of proposal 9.2 we will further consider costs that are likely to be generated by providers of asylum accommodation in exercising this duty.

Benefits

2.54. The benefits are also likely to be the same and provide significant potential saving to a local housing authority and wider public services who might otherwise provide homelessness assistance to person leaving asylum accommodation. The wider harms prevented to the health and well-being to any individual will also be significant in avoiding homelessness.

11. Expanding the duty to co-operate.

Option 11.1: business as usual

2.55. It is difficult to assess the costs in connection with the current power provided by section 95 of the HWA 2014 for a local housing authority to seek co-operation from listed public bodies. We lack evidence to illustrate the circumstances and frequency of where a local housing authority has used the power. More often, a local housing authority will seek co-operation through a combination of formal and informal

arrangements, drawing on relationships with relevant partners working in social services, health and the criminal justice system.

Option 11.2: The proposal

2.56. This option, seeking to address the ongoing issue where a local housing authority is providing assistance to a person with particular needs, that go beyond the skills of housing or homelessness officers, is likely to bring additional costs to those additional service providers caught by the duty. However, the purpose of the duty is to rely on the skills and knowledge that the public body provides rather than require them to amass new specialisms.

Costs

2.57. Costing this option is challenging because there is unlikely to be a single and consistent approach that can be adopted. Evidence suggests that variation and adaptability may be required to reflect the challenges of particular areas and their communities.²³ We can further consider approaches taken by local authorities today who have implemented gateway access points for single homeless people into accommodation, health and support services [see Cardiff Council's [Housing Options Service](#)]. An example of the possible investment is shown in Table 7 below, provided by local government partners, which records the staff required to manage a housing outreach team, which will provide particular support to people with complex needs. It should be noted that the table does not include wider partners who would also be relevant to a multi-agency response to an individual.

2.58. Associated costs with this option will come through an implementation programme and relevant training. As an assessment of those costs are not required for the RIA and we will not speculate on them when assessing the likely impact of the option.

Benefits

2.59. Initial investment in services will be likely through the proposal, but over the longer-term costs to the wider public sector are likely to be neutral given the proposal represents activity that would otherwise be carried out by less qualified housing and homelessness officers. We consider it is more likely that the option will lead to benefits to the applicant and efficiencies in the process undertaken. However, we will aim to provide a more detailed assessment for the later version of the RIA.

12. Co-operating to prevent homelessness for those with the highest and most complex support needs.

Option 12.1: business as usual

2.60. People with complex support needs who are homeless may routinely be provided with temporary accommodation shared by people with a general housing need due to their circumstances. The costs to a local housing authority will broadly be the same, but the capacity of mainstream homelessness services to provide the necessary care for people with those complex needs is highly constrained. Officers

²³ [Working in partnership: Delivering health services in homelessness settings](#)

will lack the necessary skills and will need to draw on the type of multi-disciplinary working outlined within good practice models of multi-disciplinary service provision by NICE.²⁴ As outlined in Proposal 11, funding for services of this type will vary to across Wales reflecting the complexity of circumstances in an area. The Welsh Government does not have a detailed understanding of the funding currently provided but will consider for the future RIA a method for calculating associated costs.

2.61. The Welsh Government does not collect data on the number of people who will have complex support needs. As a proportion of people who are homeless, we understand that they represent a minority of people with general housing needs. However, as with the costing arrangements, we will obtain a more detail assessment for the next version of the RIA.

Option 12.2: The proposal

Costs

2.62. We anticipate that the costs associated with this option will lead to a longer-term reduction on funding pressures felt by local housing authorities. Although support for people with complex housing needs will be more significant and require a wider range of partners, the better alignment of services should result in better outcomes and reduce pressures on wider services. As a consequence, costing these benefits may not be possible in a straightforward manner, but we will explore appropriate models which allow for this to be done.

Benefits

2.63. Similar models of work, for example the Multi Agency Risk Assessment Conference model for high-risk domestic abuse cases, show significant long-term savings compared to initial investment in relation to a similarly complex and challenging caseload.²⁵

²⁴ [Recommendations | Integrated health and social care for people experiencing homelessness](#)

²⁵ [Saving lives saving money \(safelives.org.uk\)](https://safelives.org.uk)

3. Targeted proposals to prevent homelessness for those disproportionately affected by homelessness

Children, young people and care experienced young people

13. Provide that no 16- or 17-year-old should be accommodated in unsupported temporary accommodation and that for those leaving social care or youth detention, it is expressly prohibited to use the homelessness system as a route out of care.

Option 13.1: business as usual

3.1. The White Paper outlined evidence suggesting that 6,018 young people were the lead applicant presenting to their local housing authority for homelessness assistance within 2022-2023 (the last full year for which we have data). Of these, 423 presentations were people aged between 16-17 years old, and 2,358 were legally owed a duty.²⁶ In the same year 16- and 17-year-olds were placed in temporary Bed and Breakfast accommodation on 114 occasions.²⁷ Care leavers aged 18 to 21 years old were placed in temporary Bed and Breakfast accommodation on 171 occasions.²⁸ However, it is likely that this data under-represents the extent of homelessness amongst young people, which is likely to include forms of homelessness that are considered 'hidden', such as sofa-surfing and sleeping in cars.²⁹

3.2. A particular group of children and young people significantly overrepresented in homeless figures are those who are care experienced; one in three (33%) care experienced young people become homeless in the first two years of leaving care.³⁰ More than one in four of all young homeless people have been in care, with 26% of care experienced individuals having slept on friends' or families' sofas, and 14% having slept rough on the streets.³¹

3.3. The HSG funding breakdown of costs for temporary supported accommodation projects of young people, at Table 7, outlines the current investment from the Welsh Government. We have not been able to confirm the amount of funding allocated by local authorities towards these projects, which we will attempt to reflect for the future RIA.

²⁶ [Households for which assistance has been provided by outcome, age and gender](#)

²⁷ Combining data on those placed under Homelessness and Social Services and Wellbeing legislation.

²⁸ [Total placements in bed and breakfasts during the quarter, by length of stay and provision](#)

²⁹ [Homelessness accommodation provision and rough sleeping: March 2023 | GOV.WALES](#) – This data has not undergone the same level of quality assurance as official statistics and the data may be revised in future.

³⁰ [Who cares? The Link Between Leaving Care and Homelessness \(stepbystep.org.uk\)](#), cited in Review Paper: Considering recommendations on wider legislation Expert Review Panel, June 2023

³¹ [Preventing homelessness in care experienced individuals](#)

Table 7: HSG funding for temporary supported accommodation projects of young people

Project Type	Project Type Breakdown	Client Units (numbers)	Spend against Project Type (£)	Spend per Unit (£)
Temporary Supported Accommodation	Young people	1,071	14,195,300	13,254

3.4. A variety of children's accommodation projects are also funded from a mix of legacy money from the Integrated Care Fund (ICF), Housing Benefit and local authority match funding and new funding streams like Housing with Care Fund (HCF), Health and Social Care Integration and Rebalancing Capital Fund (IRCF). It has not been possible to account for these types of projects through this assessment, but we will explore whether a clearer indication of cost can be found for the later version of this document.

Option 13.2: The proposal

Costs

3.5. Costs for this option would potentially link to the current spend per unit for temporary supported accommodation for young people. At £13,254 per unit, a simple calculation would multiply this sum against 114 16- and 17-year-olds and 171 care leavers aged 18 to 21 years old who were placed in temporary Bed and Breakfast accommodation. This calculation is likely to be too crude and may underestimate the true demand on services, for example, provided by a local authority's Children's Services Department or other funding schemes. We will explore for the later version of this document the potential range of funding streams.

Benefits

3.6. We consider that this requirement will complement the trauma-informed and person-centred approaches we hope to see delivered by local housing authorities.

14. A duty on a local housing authority to make inquiries into whether an applicant is care-experienced, as they complete the assessment of housing need and Personal Housing Plan.

Option 14.1: business as usual

3.7. Costs and benefits in connection with current arrangements are set out in Proposal 2 to require the making of a personal housing plan. Those broad estimates are relevant to this option. We are not aware, through the current provision of personal housing plans, of consideration given to whether an applicant is care-experienced and how or whether it affects the assistance offered. The potential absence of such consideration risks inhibiting the quality of assistance offered and the successful outcomes for any applicant who is care experienced. Any failure in the support offered to applicant is likely to have a vastly different cost than confirming whether they were care experienced.

Option 14.2: The proposal

Costs

3.8. The cost of this proposal is likely to be minimal and involve a small amendment to the application process of a local housing authority. Confirmation that an applicant is care-experienced will require appropriate safeguards to ensure that this information is held in accordance with data protection arrangements. However, these arrangements should be routinely followed and add little cost to a local housing authority's work.

Benefits

3.9. Linked with our proposal to ensure that care-experienced people should be considered priority need (unless or until the test is abolished, based on the proposals set out earlier in the White Paper), this reform will strengthen the person-centred and trauma-informed approaches adopted by local housing authorities and enable people who are care-experienced to engage confidently with services.

15. Considering whether the Renting Homes (Wales) Act 2016 should be amended to allow 16- and 17-year-olds to be able to be occupation contract holders.

Option 15.1: business as usual

3.10. When introduced, the Renting Homes (Wales) Bill included provision for 16- and 17-year-olds to have the same right to an occupation contract as those aged 18 and over.³² Those provisions were not taken forward when the Renting Homes (Wales) Act 2016 was passed, but the Bill's accompanying Explanatory Memorandum highlighted the difficulties for a local housing authority to provide accommodation for 16- and 17-year-olds.³³

3.11. Attributing costs resulting from such difficulties is challenging, but the inability of this younger age group to be provided with a home of their own could mean that an over-reliance is placed on forms of supported temporary accommodation. The costs illustrated by the HSG of a spend of £13,254 per unit for supported temporary accommodation for young people may be relevant to this option. Not all young people will have the maturity to benefit from this option, which makes a calculation against those currently provided with supported temporary accommodation difficult.

3.12. Although uncommon, in certain circumstances, exploitation of these young people may occur as they are at particular risk of harm due to their age and a local housing authority will be required to offer assistance as a priority.

³² [Renting Homes \(Wales\) Bill](#)

³³ [Renting Homes \(Wales\) Bill Explanatory Memorandum](#)

Option 15.2: The proposal

Costs

3.13. We consider that this option is likely to generate few costs and is more likely to lead to savings to a local housing authority in being able to help place 16- and 17-year-olds in their own homes, avoiding the use of supported temporary accommodation.

3.14. As we set out in the White Paper, the risk of exploitation does present a risk and will require consideration if this option is progressed further. The maturity of 16- and 17-year-olds will vary and if they fail or struggle to manage an occupation contract, costs could result to landlords and wider public service providers.

16. Care-experienced people should be considered priority need unless or until such a time this test is abolished (based on the proposals set out earlier in the White Paper).

Option 16.1: business as usual

3.15. A calculation of cost will be dependent upon an understanding of the numbers of applicants for homelessness assistance who are care experienced. The Welsh Government does not record data of this type and an appropriate proxy may be required as it is unlikely that applicants will be asked consistently by local housing authorities across Wales whether they are care experienced. This will be explored for the later RIA, but we anticipate that it will be a broad measure given the uncertainty surrounding the circumstances of care-experienced people and likelihood of becoming homeless.

3.16. The continuation of the no one left out approach will nevertheless mean that every effort will be made to provide assistance to care-experienced people who are homeless or at risk of becoming so. Relevant costs may then be determined against the current estimated costs for support offered under the three main duties.

Option 16.2: The proposal

Costs

3.17. We do not consider that the costs with this option will lead to any significant change to expenditure incurred by a local housing authority. The broad entitlement to homelessness assistance now offered through the no one left out approach, should not alter the demand on services.

Benefits

3.18. The option will signal an important recognition of the challenges care-experienced people face. We hope that this will strengthen the person-centred and trauma-informed approaches adopted by local housing authorities and enable people who are care-experienced to engage confidently with services.

17. We intend to strengthen existing corporate parenting responsibilities to ensure individuals aged 16 and 17 years who are homeless or at risk of homelessness do not fall between services, and social services and homelessness services work in true partnership to secure suitable accommodation and any broader support these young people's need.

Option 17.1: business as usual

3.19. The specificity of this proposal to these categories of young people does not correspond to current data collection arrangements. Calculating a related cost is consequently challenging. Our latest data release indicates that in 2022-23, 16 and 17-year-olds were placed in temporary B&B accommodation under the current Homelessness legislation on 75 occasions, and on a further 36 occasions under the Social Services and Wellbeing Act.

3.20. As with earlier options, the current burden experienced by a local housing authority is likely to link to cost for temporary supported accommodation for young people (based on HSG funding amounting to £13,254) and ongoing service provision. We will explore whether it is possible to confirm the extent that local housing authorities rely on this type of accommodation for young people released from the youth justice system. We expect increased costs to local authorities as a result of this proposal as our policy aim is to ensure that the vast majority of 16 and 17 years olds at risk of or experiencing homelessness receive a joint service under Welsh Government corporate parenting responsibilities.

Option 17.2: The proposal

Costs

3.21. Costs are likely to be neutral to Welsh public services as this option does not create a new accommodation duty. Potential costs may be similar to those already incurred by a local housing authority. Again, we lack precise detail on the number of people who may be affected by this option and the costs of social services funded accommodation. We will seek to identify a range of models of accommodation which may be relevant.

Benefits

3.22. The benefits of this option are likely to result in young people housed in more suitable accommodation, relevant to their circumstances than the general needs type of accommodation provided by local housing authority. This should result in better outcomes for the individuals affected, increasing the likelihood that homelessness is made rare, brief and unrepeatable.

Survivors of violence against women, domestic abuse and sexual violence

Victims of domestic abuse

18. Widen the definition of “domestic abuse” to more explicitly include controlling or coercive behaviour, economic or psychological abuse in a relationship of any duration and consider whether children should be defined as victims of domestic abuse in their own right.

Option 18.1: business as usual

3.23. There would be no costs from this option.

Option 18.2: The proposal

Costs

3.24. Costs from this option would be limited to the drafting of the definition of domestic abuse. This is likely to involve a degree of engagement with relevant partners. There may also be costs to a local housing authority in being able to offer assistance to a larger number of people. It is difficult to calculate how many people will be able to access services which are not available to them at present.

Benefits

3.25. Benefits would result in local housing authorities being able to adopt more inclusive ranges of services for survivors of domestic abuse than is currently possible. This may reduce the likelihood that those people become homeless or help ensure that the homelessness they experience is brief and unrepeatable.

19. Ensure the main housing duty includes helping the applicant, who is a survivor of domestic abuse to return to the family home following a period away, immediately or in the long-term) if they wish to do so.

Option 19.1: business as usual

3.26. Currently, some survivors of domestic abuse will, for their own safety and well-being, stay in refuge/temporary accommodation/move away from their community. There are inevitable costs and harms to that person and any dependent family living with them who are unable to return to their family home. This will have an effect in the immediate period, but if prolonged, could delay the period of recovery from domestic abuse.

3.27. The HSG provides support to people who have experienced domestic abuse, through specialist accommodation in refuges, alarm services and target hardening equipment, as shown in Table 8.

Table 8: HSG funding for services supporting survivors of domestic abuse

Project type	Project type breakdown	Numbers	Spend against project type (£)	Spend per unit (£)
Alarm services	VAWDASV	210	67,147	319.75
	Other	14,435	1,412,417	97.85
	TOTAL	14,645	1,479,565	
Refuges	Male	11	134,527	12,229.75
	Female	328	4,945,882	15,078.91
	Other	31	464,198	14,974.15
	TOTAL	370	5,544,607	
Target Hardening Equipment	TOTAL	1,141	158,012	138.49

3.28. The Welsh Government also provides funding to VAWDASV regions and specialist services to provide invaluable and lifesaving support to all victims of VAWDASV, this includes early intervention, preventative and educational support, perpetrator intervention programmes, Independent Domestic Violence Advisers for high-risk victims as well as therapeutic recovery interventions for the ongoing support of those impacted by VAWDASV. This funding ensures that no matter where a victim lives in Wales, there is a strong public and specialist service ready to help.

3.29. The VAWDASV revenue budget for 2022-2023 is £8.006 million, which includes an additional Programme for Government allocation of £1.050m. The VAWDASV indicative capital budget for 2022-2023 is £2.2 million, the VAWDASV Capital Grant Programme supports capital projects relating to VAWDASV. This includes funding to statutory and voluntary organisations.

Option 19.2: The proposal

Costs

3.30. This option is expected to include support for assisting a survivor of domestic abuse to obtain an occupation order, installing physical safety features, helping them obtain advice to have the ownership or occupation contract transferred to their name – much of which would be provided by existing services. Funding for aspects of the proposed change is accounted for in existing support provided by Welsh Government grant, as outlined in option 20.1. We do not anticipate a significant change from current funding levels as the duty aims to help guarantee that current services are sustained. However, we will consider whether further costs can be outlined in the later version of the RIA based on anticipated demand going forward.

20. Requirement for accessible housing registers and to undertake a regular review of the accessible accommodation within their stock.

Option 20.1: business as usual

3.31. Welsh Government guidance promotes the use of accessible housing registers to support the needs of people who are disabled.³⁴ Many local authorities in Wales have developed registers which are aligned to a broader Common Housing Register, developed through a local housing authority's responsibility to establish an allocation scheme for social housing. Reviews of housing adaptation have identified issues with the complexity of service offered through accessible housing registers and there can be variation and different interpretation of need amongst local authority areas.^{35 36} The lack of suitable housing options and lack of appropriate knowledge of accessible housing can increase the risk of someone living in an unsuitable home, as identified by Tai Pawb.³⁷

Option 20.2: The proposal

Costs

3.32. Costs associated with this option would be incurred by the Welsh Government in setting the expectation of a local authority to develop appropriate and effective accessible housing registers. The Welsh Government would also need to create a framework which could be adopted by local authorities for reviewing their stock of accessible housing.

3.33. Costs for a local housing authority and registered social landlords are likely to result from the scoping and design of their own register and consultation with relevant partners. Thereafter, costs may result from updating ICT and database infrastructure and information and advice services. We would expect a local housing authority to undertake this work by involving tenants and those likely to apply for social housing, recognising their particular needs and circumstances.

3.34. As most local authorities have their own accessible housing registers and policies in connection with their use, as well as policies to support the needs of people with disabilities, there may be limited costs in meeting the requirements of the proposed option. We are attempting to obtain further detail of costs in developing an accessible housing register for the RIA. A more complex and significant exercise would involve the review of accessible accommodation and the extent to which those reviews inform the development plans of a local authority and their obligations towards people with a disability, particularly those who are homeless or at risk of becoming so. That review would need to achieve an appropriate balance of accessible and general needs homes.

3.35. Potential costs of a review are set out below in terms of staff time in Table 9. However, these may vary depending on the maturity of the register and potential follow up actions.

³⁴ [for Local Authorities on the Allocation of Accommodation and Homelessness](#)

³⁵ [Housing and Disabled People Wales Hidden Crisis](#)

³⁶ [Housing Adaptations | Audit Wales](#)

³⁷ [Experiences of homelessness \(taipawb.org\)](#)

Table 9: Possible costs associated with undertaking a review of accessible accommodation

Staff costs	Annual salary plus on costs (£)	Daily cost (£)	Days required	Total (£)
EO	43,219	197	10	1,967
SEO	70, 507	320	10	3,200
Grade 7	90,165	409	5	2,045

Benefits

3.36. Accessible housing registers benefit landlords and would be tenants. Tenants are likely to encounter a simpler application process, which they may also feel is fairer than current arrangements where an accessible housing register does not exist. Accessible Housing Registers make it easier to identify accommodation suited to individual needs. Landlords are likely to benefit from having a clearer appreciation of accommodation suitable for applicants with a disability, enabling them to develop more effective housing plans for those applying for social housing. Higher tenant satisfaction will also bring benefits to the functioning of landlords, whilst an accessible housing register may improve efficiencies when allocating homes.

People with complex health needs, including mental ill health, substance misuse and those leaving hospital

Preventing discharge from hospital into homelessness

21. That legislation sets out a requirement for discharge assessments to include consideration of a patient's housing needs. That legislation sets out a joint duty for health and the local housing authority to work together to prevent homelessness at the point of hospital discharge.

Option 21.1: business as usual

3.37. Data collected on households found to be eligible, homeless subject to the duty to help to secure interim accommodation during 2018-19 (the most recent recorded period), records the reason for loss of last settled home by type of household.^{38 39} In this period, 282 households were found to be homeless having been in an institution or care (for example, hospital, residential home, army, etc.). However, this data is not broken down to specify instances of hospital treatment and discharge, making it difficult to judge the number of households who may leave hospital and immediately require homelessness assistance.

3.38. A data extract, in Table 10, provided for the RIA of the Digital Health and Care Wales Strategy showing attendances and admissions to Emergency Departments (ED), records people who were known as having a 'no fixed abode' or similar status. We hope to refine this data to include people living in a shelter, refuge and temporary

³⁸ The Welsh Government paused data collection of this type during the pandemic, but intends to restart this work in the future, though a date has not yet been confirmed.

³⁹ [Households found to be eligible, homeless subject to duty to help to secure during the year](#)

accommodation for the later version of the RIA, but the initial extract provides an indication of demand on services.

Table 10: Number of attendances and admissions at an Emergency Department (ED) for people who are homeless

Homeless ED Attendances by Health Board		
	Sum of ED Attendance Count	Sum of Hospital Admission Count
Aneurin Bevan University Local Health Board	377	59
Betsi Cadwaladr University Local Health Board	374	52
Cardiff and Vale University Local Health Board	693	90
Cwm Taf Morgannwg University Local Health Board	204	23
Hywel Dda University Local Health Board	160	12
Swansea Bay University Local Health Board	154	22
Total	1962	258

3.39. Hospital discharge service requirements developed during the pandemic period are set out in Welsh Government guidance to health, social care, third and independent sector partners.⁴⁰ Specific consideration is given to people who are homeless, and the risks faced at the point of discharge and the importance of engaging with local housing authority officers. However, the range of health symptoms that a person might experience could mean that the discharge assessment could involve at one end, a brief assessment from one member of hospital staff to input being needed from a range of specialists, who may be asked to develop a range of plans relevant to the patients housing needs.

3.40. Management data recorded that across Wales for a three-month period, from April to June 2023, found there were on average 14 people unable to be discharged from hospital because of their homelessness. The recording of data on these individuals suggests that there may not be significant numbers of people passing through hospital services without assistance to prevent their homelessness. Although there may be instances where a person discharges themselves without engaging with local housing authority services.

3.41. The consequence of a person being discharged into homelessness could result in greater demand on homelessness statutory services and likely repeat attendance at Emergency Departments. Based on current arrangements, assistance is likely to be provided through the relief duty, providing temporary accommodation for that individual. Costs associated with the relief duty were calculated at £2,274 per applicant, which if extended to the 14 people in hospital between April and June 2023 would amount to £31,836 over a three-month period if each were to be discharged in this way. The relevant cost is likely to result from excess bed days, though this may not link directly to cash savings as most costs to the NHS are fixed.⁴¹ Of course, there are likely to be wider benefits from the efficient discharge of people from hospital.

⁴⁰ [Hospital discharge service requirements: COVID-19 | GOV.WALES](#)

⁴¹ [Written Question - WQ88436 - Welsh Parliament \(senedd.wales\)](#)

Option 21.2: The proposal

Costs

3.42. Costs associated with this option will correspond with those set out in Option 18.1, which makes defining the likely burden challenging at present. However, the crucial benefit will link to avoidance of people having recovered from medical treatment becoming immediately homeless, given the known health harms from periods of homelessness. A vital step will involve ensuring a local housing authority is engaged by the hospital as soon as possible, so that homelessness prevention is considered in discharge planning arrangements.

Benefits

3.43. The element of this option for a local housing authority to be required to provide assistance to anyone due to be discharged from hospital within the next six months who is considered as threatened with homelessness, links to the option in connection with the duty to identify and refer. We would expect a referral of this type to result in minimal cost to hospital staff, with the resulting impact for a local housing authority generate the same costs as incurred when preventing homelessness under the section 66 duty. As set out in the White Paper, it is not the policy intention for these proposals to require hospitals to “hold” individuals in a hospital bed. We will test these proposals further with health colleagues to understand likely impacts on discharge rates and we will actively work to ensure that the proposal does not contribute to delayed discharge.

People involved with the Criminal Justice System

Changes to core duties

22. When a prisoner is first sentenced to imprisonment, an assessment should be made at reception stage (the point the person first enters prison) of whether the prisoner is likely to lose any accommodation while serving their sentence of imprisonment and, if so, whether they are also likely to lose their possessions and whether they are likely to be released, and homeless, within six months.

Option 22.1: business as usual

3.34. Current screening of prisoners is undertaken immediately on reception (with a particular focus on safety) and followed by a more detailed assessment 72 hours later where housing and homelessness issues are considered. Depending on the second assessment, information will be forwarded to the resettlement team. In instances where there are issues with information being passed on to the resettlement team, the accommodation and possessions of a prisoner could be at risk. The loss of both can create significant harm and costs for the individual in custody.

3.35. The costs associated with the assessment of a prisoner are likely to mirror those captured under Proposal 2 along with the potential preventative measures, as costed under Proposal 1.

3.36. The benefits of current arrangements rely on good practice being followed consistently. We understand that this does not always happen.

Option 22.2: The proposal

Costs

3.37. The most significant additional cost related to this proposal relates to the change of practice needed in providing suitable office space within part of the secure estate, with access being facilitated for local housing authority staff to enter those offices without issue. It may also be the case that additional staff time is required to facilitate site visits.

Benefits

3.38. The benefits of this option would be significant, particularly if action taken at the point of reception enables a person in custody to retain their current home and prevents repeat homelessness. The individual benefits are also significant; throughout our engagement work we have heard about the emotional and financial cost of losing meaningful possessions.

23. Where a person is threatened with homelessness within six months, a referral should be made by prison authorities to the local housing authority and a prevention duty will be owed by the local housing authority.

Option 23.1: business as usual

3.39. The costs for this option are outlined in the existing provision of prevention assistance in Proposal 1, which is expected to take place within a 56-day period. For officers working within prisons, a referral to a local housing authority is likely incur the type of cost set out in Proposal 9.

3.40. Current arrangements are relevant to the provisions of the HWA 2014. Option 23.2 (the preferred option) reflects the need for compatibility with the wider reforms proposed in the White Paper.

Option 23.2: The proposal

Costs

3.41. The extension of the period in which preventative work can take place from 56 to more than 180+ days (6 months) could lead to opportunities for more activity to take place in the period available. However, we consider that it is likely that any additional cost will be minimal. A more probable outcome is that more timely and effective steps can be taken to help prevent homelessness within a longer period of time than in seeking to meet the needs of the individual, with savings to public services resulting. The process of referral to a local housing authority should represent a minimal cost to prison authorities, which were outlined in Proposal 9.

24. Set out clearly in legislation that prisoners are not homeless and that prisoners who are within six months of release are threatened with homelessness.

Option 24.1: business as usual

3.42. There are similarities in cost and benefit between this proposal and proposal 23 in identifying the costs of identifying and acting on the risks of homelessness for a person in custody.

Option 24.2: The proposal

Benefits

3.43. Post reception stage, this proposal provides local authorities and partners with clarity over when to begin engagement with a person in custody who is homeless or threatened with homelessness. As with proposal 23, the six-month timeframe provides benefits that come with being able to undertake preventative measures sooner.

25. We propose that those in custody (be it on remand, recall or sentence) do not meet the criteria for a homeless assessment unless one of the three following conditions are met:

- they are already under an existing duty under the HWA 2014;
- where existing accommodation is at risk as per the existing (or amended) definition; and/or
- six (or fewer) months prior to release.

Option 25.1: business as usual

3.44. Presenting the costs with this option are challenging as reported issues are understood to come from interventions not always being made at critical time periods. These issues will vary from case to case, but instances where this does not occur will generate costs to the local housing authority in addressing the needs of someone who has left custody and becomes homeless.

Option 25.2: The proposal

Costs

3.45. This proposal does not increase the amount of people leaving prison who are eligible for homelessness and housing support but provides local housing authorities with an opportunity to engage with those leaving prison earlier, maximising the impact of prevention activity and improving efficiencies.

3.46. It is not possible to determine the number of people leaving custody who may be impacted by this option, but we will attempt to explore this with partners for the final version of this assessment.

Prison leavers, prevention and local connection

26. As part of the initial assessment of housing need of a prisoner at risk of homelessness, the local housing authority should be permitted to refer the prevention duty under local connection, so that the prevention duty and main housing duty are carried out by the same local housing authority, rather than one local housing authority carrying out the prevention duty and subsequently referring the main housing duty to another local housing authority.

Option 26.1: business as usual

3.47. Costs for this option come from the duplication of assessment and possible intervention of preventative duties by different local housing authorities. Those costs are accounted for in Proposal 1. The resulting inefficiencies can negatively impact on the wider services provided by a local housing authority.

Option 26.2: The proposal

Costs

3.48. We do not consider that there will be additional costs resulting from this option as it should lead to more focused activity on the part of a local housing authority. The necessary homelessness prevention work will be undertaken by the officers of the local housing authority based within the prison, acting on behalf of the 'home' local housing authority, supporting the needs of the person in custody.

Benefits

3.49. Without this arrangement, a new housing and homelessness team would need to manage the assistance offered. The greater ownership and consistency of service provided by the lead local housing authority should lead to improved outcomes for the individual affected.

Early release

27. Where a prisoner needs accommodation from a local housing authority in order to achieve an early release, parole or bail, the prisoner should be deemed as homeless at the early release date.

Option 27.1: business as usual

3.50. The potential costs caused by the delay in finding accommodation for person who is eligible for release from custody will vary according to the types of prison facility that currently exist.⁴² For example, the annual overall resource expenditure for a prisoner in a Male category C Trainer and Resettlement facility will cost £40,391, compared to £253,569 for someone in a Male Young Offenders Institution young

⁴² Male category B Trainer, Male category C Trainer and Resettlement, Female closed; Male dispersal; Female local and Male reception; Female open and Male open; Male closed YOI (ages 18-20); Male YOI young people (ages 15-17)

people (ages 15-17) facility.⁴³ Even at the lower scale, these costs illustrate the importance of securing accommodation efficiently. The lack of recognition of the potential for a person in custody to be homeless at their point of release could add additional days spent within custody. A precise figure is not known, but we understand from practice-based evidence that this situation happens routinely.

Option 27.2: The proposal

Costs

3.51. This option is likely to generate minimal costs for a local housing authority, through the administration of notification arrangements for the person in custody. A more significant challenge will be identifying appropriate accommodation for an individual to move into on their date of release. We have identified no additional costs for criminal justice services at this time.

Benefits

3.52. The benefits for this option would come from the savings to prison services who would be able to release people into settled and secure accommodation at their early release date. Each day the release is delayed due to the absence of accommodation will generate additional cost to public services, therefore this option has the potential to generate savings for prison services (although this dependent on access to suitable accommodation). The use of approved premises, as staging points for people leaving custody before returning to normal life, may also be reduced if accommodation is secured in advance. The benefits to the person leaving custody will also be significant, likely resulting in a more successful rehabilitation than if they face an unstable housing situation.

Material change of circumstance

28. We propose to make clear that any time in custody must be considered a change of circumstances regardless of the length of the detention or whether it is related to a recall to prison.

Option 28.1: business as usual

3.53. We understand that custody is not always accepted as a change in circumstance leading to some otherwise homeless applicants being refused an assessment and a probable homeless duty. There is limited data available on the frequency of situations relevant to current arrangements. However, we will explore whether a firmer evidence base can be established for the later version of the RIA.

3.54. Any benefit from this option is limited to a short-term saving, with assistance being withheld. However, the lack of continuity of service and probable eventual restarting of assistance will wipe out those benefits.

⁴³ [Prison performance data 2021 to 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/prison-performance-data-2021-to-2022)

Option 28.2: The proposal

Costs

3.55. We anticipate that any additional costs resulting from this proposal will be covered through the additional burdens related to the abolition of the Priority Need and Intentionality tests. There is also the potential for fewer duties to be discharged in the first place as the applicant will be eligible for a re-assessment, thereby actually saving the costs associated with both the administration of discharging a duty and the costs of undertaking an assessment.

Benefits

3.56. Benefits are expected from the improved service to the person who is at risk of homelessness and their engagement with the local housing authority. Criminal justice services will also benefit from this option as it will help guarantee that support and accommodation is offered by the local housing authority.

Discharge of duty

29. Those who are recalled or sentenced to custody while in receipt of an existing duty must not have their duty automatically ended.

Option 29.1: business as usual

3.57. There is limited data on people whose homelessness assistance is ended due to being recalled or sentenced to custody. However, we will seek to identify this for the future version of this document. Practice-based evidence does indicate that the point at which a recall or sentencing occurs can lead too quickly to the discharge of duties, even for short stays or sentences.

3.58. The person who is recalled or sentenced may remain vulnerable to homelessness on release and the stopping and restarting of assistance is likely to lead to longer term costs even if efficiencies are found in the short term. It also raises the risk of individuals becoming street homeless. This issue will be exacerbated for people who might be recalled on a number of occasions yet remain vulnerable to homelessness in that time. The repetition of assistance recommencing may also be harmful to the individual having to engage with services. For criminal justice services, the uncertainty of assistance offered to people placed in custody can mean that it is necessary to step in until a local housing authority reengages with the applicant.

Option 29.2: The proposal

Costs

3.59. There are similarities in terms of costs for this option with proposal 28, in that it will maintain the provision of assistance for longer. However, the benefits will come from the continuity of that assistance and the avoidance of criminal justice services 'filling the gap' until the person in custody reengages with a local housing authority when they are released back into society.

Benefits

3.60. The individual affected will benefit from the consistent assistance offered and should be able to avoid repeating their engagement with local housing authority officers when the risk of homelessness is identified.

30. Anyone who is remanded, sentenced, or recalled to custody is not subject to the discharge points at section 79(2) to (5) of the HWA 2014, unless they meet the circumstances where section 79 should apply.

Option 30.1: business as usual

3.61. Costs with current arrangements have been identified with the practice of ending homelessness assistance in circumstances where a person can be placed in custody for short periods of time, which can be as short as 24 hours. There are again similarities between this situation and those in proposals 28 and 29, with the restarting of assessments of an individual once they are released from custody, which will bring inevitable cost to the local housing authority. There are additional costs to the individual if the process of reengagement is unsuccessful, leading to a cycle of street homelessness or living in unstable accommodation that creates a risk of committing further crimes and a return to prison. There are few benefits from this option other than a short-term saving to a local housing authority, which is lost to a significant degree by the longer-term costs.

Option 30.2: The proposal

Costs

3.62. We consider that there are limited costs incurred from this option, which would be spent on case management arrangements until the applicant is released from custody. Monitoring arrangements ought to be less intensive than active forms of assistance when the applicant is not in custody. We will seek to identify a clearer estimate of numbers of people affected by this proposal to develop more reliable figures of cost for the final version of the RIA.

Benefits

3.63. Benefits of this option will reflect the simplification of assistance, which is maintained throughout the period of custody, rather recommended post custody, requiring reassessments of need and further cost to the local housing authority. This ongoing assistance aims to retain accommodation where possible and prompt proactive prevention work where retention is not possible.

31. A new power for Welsh Ministers to make regulations in relation to reciprocal arrangements. This proposal would also require changes to eligibility for local connection; specifically for some who would benefit from a new environment and where their risks of re-offending or returning to negative behaviours would be reduced.

Option 31.1: business as usual

3.64. Practice based evidence has identified the challenges faced by some individuals reintegrating with society after periods of custody when they return to former homes. Making a fresh start, with the necessary support in another area can avoid the risks that might otherwise exist and help avoid re-entering patterns of behaviour that can lead to homelessness and possible criminality. It is difficult to obtain reliable data on the numbers of people at risk, but we will explore options which may show this for the final version of this document.

3.65. At times, disputes or delays can result between local housing authorities when attempts are made to move a person, who would otherwise be provided with assistance in one area to another. Whilst negotiations proceed, criminal justice services will provide short-term placements for individuals in approved premises. However, this is a costly option and delays the rehabilitation of the individual who is faced with uncertainty in planning their future. There are few benefits from this option other than preventing a person with a criminal past from being offered assistance in a new area, based on the perception that are more likely to commit a crime and cause problems to that community.

Option 31.2: The proposal

Costs

3.66. Over the longer term we do not anticipate that additional costs will be generated by this option as the intention will be to establish reciprocal arrangements, aimed at balancing the costs of assistance between local housing authority areas. In the early phase of implementation, the costs may be felt by certain local authorities more than others.

Benefits

3.67. The benefits of this option would come from increasing the likelihood that an individual avoids the risks that could lead to further homelessness and potential criminality. Establishing effective agreements between local housing authorities should reduce the likelihood of delays, currently seen at present, where negotiation takes place on the appropriateness of offering assistance to an individual. A more efficient process should reduce the demand on approved premises and ideally allow the person leaving custody to enter general needs housing or homelessness accommodation.

32. Place an expectation on local authorities, where there is a secure establishment within its boundaries, to secure the provision of a sufficient advice service to those in both adult and/or youth justice.

Option 32.1: business as usual

3.68. Current estimates show that on average there are almost 5,000 prisoners within the secure estate in Wales.⁴⁴ A proportion of those that leave prison are at risk of becoming homeless, though data is only available up to 2018-19 on the number of households of this type, accepted as homeless and who received assistance according to powers provided by section 66, 73 and 75 of the HWA 2014.⁴⁵ That data and associated costs, illustrated in Table 11, showed for those receiving assistance under section 66 (10,737 in total), 216 were a prison leaver, of those given assistance under the section 73 duty (11,715 in total), 1,317 were a prison leaver and of those assisted under section 75 (2,631 in total), 174 were a prison leaver.

Table 11: Cost of assistance provided under the HWA 2014 to prison leavers based on 2018-19 estimates.

Cost per outcome	Number of applicants who are prison leavers	Cost
£1,112 per applicant eligible to assistance in accordance with the prevention duty (Section 66)	216	£240,192
£2,274 per applicant Eligible, homeless, subject to duty to help to secure (Section 73)	1317	£2,994,858
£2,274 per applicant who may be considered as "eligible, homeless, in priority need and unintentionally homeless" (Section 75)	174	£395,676

3.69. We will attempt to obtain more reliable estimates for the later version of this document, but as an initial proxy estimate, comparing the historic (2018-19) number of prison leavers against the current population suggests 4.3% may receive assistance under section 66, 26% under section 73 and 3.5% under section 75, which is shown in Table 12.

⁴⁴ There is no official published statistics for the number of Welsh individuals in prison specifically (as opposed to prisoners in Welsh Prison establishment), partly due to the complexity of how to determine a Welsh prisoner. Estimates produced by academics in Cardiff university who request data on the number of prisoners with a Welsh home address at time of reception provide estimates from 2019 ([Microsoft Word - Prison, Probation and Sentencing in Wales - 2019 Factfile.docx \(cardiff.ac.uk\)](#)). It estimated average number of Welsh men in prison to be 4,702 in 2019 (p22) and the equivalent figure for women was 261 as mentioned on page 68.

⁴⁵ The total number of households provided with assistance in 2018-19, in accordance with duties under the HWA 2014 were 14,160.

Table 12: Average population of prison in Wales by establishment in 2021-22 and possible number who may receive assistance through the HWA 2014 based on 2018-19 estimates.⁴⁶

Establishment name	Average Population	<i>S66 (4.3% of pop.)</i>	<i>S73 (26% of pop.)</i>	<i>S75 (3.5% of pop.)</i>
Cardiff	694	30	180	24
Swansea	340	15	88	12
Berwyn	1,802	77	469	63
Parc	1,614	69	420	56
Usk/Prescoed	463	20	120	16
Totals	4913	211	1277	172

Option 32.2: The proposal

Costs

3.70. The costs of this option will require further refinement based on the collection of more reliable data than currently available. However, we consider that there is a credible demand for assistance being needed by prisoners before leaving custody, considering the numbers who subsequently seek assistance once they have left prison.

Benefits

3.71. The appropriate intervention through the provision of preventative assistance could avoid subsequent demand through the current interim and main duties offered by section 73 and 75 of the HWA 2014. Whilst the key costs may be localised to the areas in which prisons are located, there are likely to be wider savings from providing effective assistance whilst people are in custody.

Retention of accommodation

33. Provide that consideration is given to whether accommodation could be offered to a prisoner under the prevention duty, with a view to it being available on release, either under an occupation contract or on a more informal basis (accommodation with family or friends).

Option 33.1: business as usual

3.72. Costs outlined in proposal 32 indicate the potential demand for accommodation based on those who have received homelessness assistance as a feature of the three main duties, although we recognise the age of the current data will affect its reliability. This assistance will be offered to the applicant closer to the point of crisis, after they have left custody, rather than at a more appropriate point of intervention. A less positive outcome is consequently likely if that intervention is delayed.

⁴⁶ [Prison performance data 2021 to 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/prison-performance-data-2021-to-2022)

3.73. The benefits of maintaining current arrangements in this option reflect the uncertainty that a local housing authority may have in offering accommodation in advance. This would recognise that the needs of the applicant are uncertain, measured against the acute demand for accommodation that currently exists from people who are homeless as well as those with a general need for housing.

Option 33.2: The proposal

Costs

3.74. We do not consider that additional burden will be created from this option as it reflects the application of assistance (and the associated costs) at an earlier stage than may otherwise happen. We recognise that local authorities will not be able to hold properties for long periods of time, given the demands on housing supply. We anticipate benefits from arrangements being made in advance to support the transition from custody to life outside prison, which should help limit the probability of homelessness and criminality occurring.

Retention of belongings

34. Amendment to the Social Services and Well-being (Wales) Act 2014 to ensure that retention of belongings is included as part of the reasonable steps that need to be taken under Part 11 of that Act.

Option 34.1: business as usual

3.75. In fulfilling its homelessness functions, section 93 of the HWA 2014 provides that a local housing authority has a responsibility to prevent the loss of property of an applicant or mitigate possible damage. Those costs will be accounted for within the broader estimates outlined in proposal 1, but we do not yet possess details of storage arrangements that a local housing authority will require. We will attempt to obtain this information for the final version of this document.

Option 34.2: The proposal

Costs

3.76. We do not consider there will be new costs resulting from this option, but rather the relevant costs being incurred by a social services authority rather than those of a local housing authority. Benefits are likely to result from this option in aligning responsibility of retaining belongings more appropriately to the likely interactions of the individual with services. At this point, it is likely that a social service authority will be engaging more actively with the individual than a local housing authority. We will need to engage further with social services to understand likely implications.

Young People

35. For young people leaving the secure estate, we propose legislation and guidance should be clear 16- and 17-year-olds, who are expected to be released from the youth justice system within six months, are the responsibility of the local authority as part of their corporate parenting responsibility.

Option 35.1: business as usual

3.77. For future versions of the RIA, we will aim to provide estimates of the actual demand on services in terms of numbers of 16-and -17-year-olds who may require assistance, however our latest data release indicates that in 2022-23, 16- and 17-year-olds were placed in temporary B&B accommodation under the current Homelessness legislation on 75 occasions, and on a further 36 occasions under the Social Services and Wellbeing Act. As with proposal 17, the current burden experienced by a local housing authority is likely to link to cost for temporary supported accommodation for young people (based on HSG funding amounting to £13,254) and ongoing service provision. Through the next iteration of this RIA, we will seek to identify data to help identify what additional burden this proposal may place on the local authority. We understand that many of this group will already be in receipt of care and support, but this may not be the case for every 16- and 17-year-olds leaving the youth justice system.

Option 35.2: The proposal

Costs

3.78. We expect increased costs for Welsh public services as a result of this proposal as our policy aim is to ensure all 16- and 17-year-olds who are leaving the secure estate and at risk of homelessness receive support as part of the Welsh Government corporate parenting responsibility. Potential costs may be similar to those incurred by a local housing authority. As with proposal 17, we lack precise detail on the number of people who may be affected by this option and the particular costs of social services funded accommodation. We will seek to identify a range of model of accommodation which may be relevant.

Benefits

3.79. The benefits of this option are likely to result in young people housed in more suitable accommodation, relevant to their circumstances than the general needs type of accommodation provided by local housing authority. This should result in better outcomes for the individuals affected, increasing the likelihood that homelessness is made rare, brief and unrepeatable.

36. For young people in youth detention, who are or were care leavers aged 18 to 21 (or 18 to 24 if in education or training) should also benefit from joint work between social services and the local housing authority to support and accommodate.

Option 36.1: business as usual

3.80. We consider that the analysis of costs and benefits mirror those for proposal 35.

Option 36.2: The proposal

3.81. We consider that the analysis of costs and benefits mirror those for proposal 35.

4. Access to accommodation

Suitability and Temporary Accommodation

The basic standard of all types of accommodation is improved

37. Ensuring that accommodation with Category 1 Hazards is always unsuitable.

Option 37.1: business as usual

4.1. The Renting Homes (Fitness for Human Habitation) (Wales) Regulations 2022 [“the 2022 Regulations”] placed a requirement on all landlords to ensure the dwelling they rent is fit for human habitation (FFHH) in accordance with section 94(1), 94(2)(b) and 94(3) of the Renting Homes (Wales) Act 2016, by reference to a number of matters and circumstances which broadly reflect the 29 matters and circumstances set out in the Housing Health and Safety Rating System (HHSRS) and specific additional duties. Those Regulations have been in force since 1 December 2022 and will lead to a process of improvement of rented accommodation across Wales.

4.2. The accompanying RIA for the 2022 Regulations considered the latest available evidence on the number of Category 1 hazards identified in the Welsh Housing Conditions Survey of 2017-18 (the most recent data source that provides an assessment of HHSRS hazards present across all tenures in Wales) to estimate the potential impact on landlords of adopting the approach set out in the (then) proposed Regulations, set out in Table 13 and Table 14.⁴⁷

Table 13: Category 1 hazards by tenure, Wales, 2017-18

Number	Tenure		
	Owner-occupied	Social housing	Private rented
0 Category 1 hazards	745,000	221,000	137,000
1 Category 1 hazard	179,000	13,000	32,000
Total	924,000	238,000	180,000

Table 14: Costs to make safe for 26 HHSRS hazards for the rented sector Wales, 2017-2018 ⁴⁸

	Social housing	Private rented	Total
Costs (£)	31,000,000	92,000,000	123,000,000

⁴⁷ [EM/RIA GUIDANCE \(senedd.wales\)](#)

⁴⁸ 26 of the 29 Hazards were assessed in the survey. Asbestos (and MMF), Biocides and volatile organic compounds were not assessed.

4.3. The Welsh Housing Conditions Survey will reflect forms of temporary accommodation, but based on current monthly management data, there is more variety of accommodation in use.⁴⁹ B&Bs, hotels and hostels make up 50% of current temporary accommodation use, which are not considered by the Survey and consequently it is difficult to measure their quality. Given their prior commercial use, making improvements can also be challenging, especially as the Welsh Government wishes to reduce the use of these forms of accommodation, to prioritise more settled types of home.

Option 37.2: The proposal

Costs

4.4. The RIA for the 2022 Regulations set out the costs and benefits associated with preventative measures in installing fire alarm systems, carbon monoxide detectors and electrical safety testing requirements. These, along with other improvements will be undertaken as a consequence of the 2022 Regulations, making it difficult to attribute cost to the proposal to ensure Category 1 Hazards are made unsuitable in forms of temporary accommodation.

4.5. Additional costs are likely to arise from the broader programme, seeking to reduce the use of B&Bs, hotels and hostels through the implementation of the rapid rehousing programme. However, we will attempt to obtain more reliable estimates for the later version of the RIA.

38. Prohibiting shared sleeping space.

Option 38.1: business as usual

4.6. As outlined in the White Paper, we hope that the use of shared sleeping arrangements is rare, making it difficult to find a reliable method of generating accurate costs to local housing authorities and their partners. We consider that the financial cost is likely to be negligible currently.

4.7. Although the use of shared sleeping space is unusual, the Welsh Government consider its use inconsistent with one of the overriding principles governing the proposed reforms, to facilitate service delivery that is trauma informed and person-centred.

Option 38.2: The proposal

Costs

4.8. We expect a marginal increase in costs to local housing authorities to ensure that shared sleeping space is unnecessary, due to the infrequent use of such accommodation at the current time. However, we will seek to gather better data on use of this type of accommodation, particularly through the coming winter where its use may increase.

⁴⁹ This includes bed and breakfast and hotels, caravan parks or similar holiday accommodation, hostels (including reception centres and emergency units), Women's refuge – along with private sector accommodation and RSL stock.

Benefits

4.9. The benefits will be measured through the more trauma-informed and person-centred treatment of people living in temporary accommodation, which will assist in their recovery from a period of homelessness.

39. Applying the same standards across privately owned and local housing authority/registered social landlord owned or managed non-self-contained accommodation.

We propose that exceptions in law which provide that accommodation that does not meet the higher standard will be suitable for up to 6 weeks if the accommodation is owned or managed by a local housing authority or registered social landlord should be abolished. The same standards should apply across privately owned and local housing authority/registered social landlord owned or managed non-self-contained accommodation.

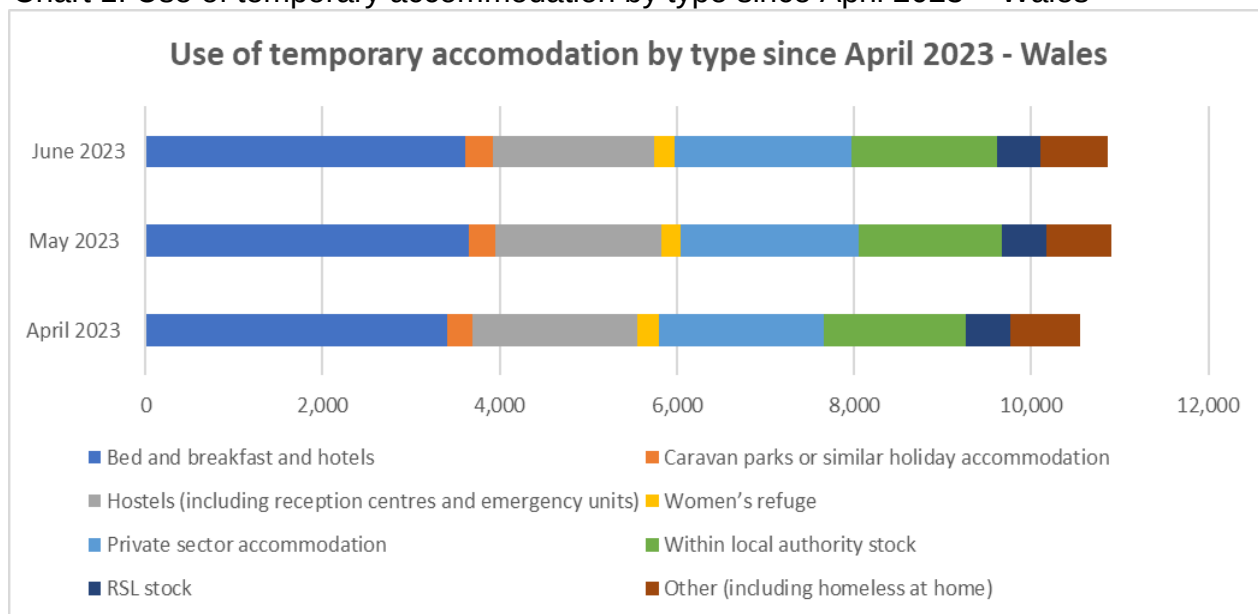
Option 39.1: Business as usual

4.10. The White Paper outlines the considerations that a local housing authority must have towards the Homelessness (Suitability of Accommodation) (Wales) Order 2015 (“the Suitability Order”) in the context of housing provided to social landlords rather than those in the private rented sector.

4.11. Prior to the no one left out approach, the use of unsuitable accommodation is understood to have been relatively uncommon. Bed and breakfast and similar types of lower quality accommodation, in the past were used as a short-term solution to pressures on services. However, these now represent a significant portion of homelessness stock as illustrated in Chart 1, which has been developed through management data obtained by the Welsh Government.⁵⁰

⁵⁰ There are weaknesses associated with the data presented in this Chart in terms of statistical assurance and under and non-reporting of accommodation use. Consideration of the chart should be limited to how it illustrates broad trends.

Chart 1: Use of temporary accommodation by type since April 2023 – Wales



4.12. Proposal 6 outlines some of the associated costs with the use of temporary accommodation, with proposal 41 illustrating the costs associated with improving the quality of accommodation through the Transitional Accommodation Capital Programme (TACP). A further method of improving housing standards in the social housing sector comes through the Welsh Housing Quality Standard (WHQS), with social landlords expected to assess and undertake necessary improvements in line with guidance.⁵¹ To supplement this improvement, in 2023-24, the Welsh Government intends to provide through Major repairs allowance funding, more than £60m to local authority landlords and almost £44m through Dowry gap funding to Registered Social Landlords. Whilst distinct to temporary forms of accommodation, these costs illustrate the amount of funding that is required to maintain certain stocks of housing.

Option 39.2: The proposal

Costs

4.13. Providing an estimate of costs for this proposal are currently challenging until a clearer picture of the quality of temporary accommodation is known, along with the necessary improvements which may be required. Some limited analysis has been undertaken on the merits of improving the habitability of accommodation, in the context of a right to adequate housing.⁵² However, it is difficult to extend that work to this option, particularly to the potential variability of private rented accommodation and the infrequency in which it is assessed compared to social housing. The number of people in temporary accommodation will give an indication of properties affected, but we cannot be certain how many will not meet the higher standard of suitability.

4.14. We will seek to obtain more reliable evidence for the future version of this RIA to better understand the likely number of properties affected by this option. Consideration may also need to be given to how the proposal links or impacts on the Renting Homes (Wales) Act 2016.

⁵¹ [Welsh housing quality standards guidance for social landlords](#)

⁵² [The right to adequate housing in Wales: cost-benefit analysis](#)

40. Ensuring that placement in overcrowded accommodation is never suitable at the point of discharge of the main housing duty.

Option 40.1: business as usual

4.15. As with the use of shared space in proposal 39, the Welsh Government holds no reliable measure of the use of overcrowded accommodation by local housing authorities in Wales. This makes it difficult to provide an estimate of cost to this practice. There could be a potential saving to a local housing authority by relying on accommodation which is too small for the needs of the individual, or more likely a household.

4.16. The Transitional Accommodation Capital Programme (TACP) was established in 2022 to quickly bring forward more good quality longer term accommodation to respond to the increasing pressures on temporary accommodation, including that created by the war in Ukraine. The TACP has supported a range of accommodation solutions, including rapidly bringing back into use void or “mothballed” properties that would otherwise not be re-let, remodelling existing accommodation, converting buildings, demolition and newbuild and modular accommodation. In 2022-23, £76.4m was provided through TACP related funding to deliver 936 additional homes to help relieve pressures on temporary accommodation. 562 of which will contribute towards the target of producing 20,000 affordable homes to rent.

4.17. The TACP has applied a pragmatic approach to developments, adopting a hierarchical range of standards, with the development of a new minimum standard for TACP to allow a greater choice of accommodation options to be delivered at pace. In balancing the need to respond quickly to address housing pressures, homes may not initially be self-contained and meet social housing standards (WDQR2021/WHQS). Where this happens, social landlords are required to demonstrate that the accommodation meets minimum standards, set out in guidance, and progress to remodel the home to meet, as a minimum WHQS within 10 years and where possible WDQR2021.

Option 40.2: The proposal

4.18. The TACP represents one form of development that supports a local housing authority to reach the objective of limiting the use of inadequate, overcrowded housing. We will consider whether there are other appropriate measures of cost for the subsequent RIA.

41. Prohibiting the use of unsupported temporary accommodation for young people.

Option 41.1: business as usual

4.19. Monthly management data showed that in May 2023, 5,830 people were living in forms of temporary accommodation, some of which may be unsupported by a local

housing authority.⁵³ Of that total, the number of dependent children aged under 16 were 1,357. Data is not currently available on young people aged up to 25, who may be housed through these arrangements, making it difficult to assess the demand on services.

Option 41.2: The proposal

Costs

4.20. The Welsh Government contributes towards the costs of supported forms of temporary accommodation provided by local housing authorities, as outlined in Table 15.

Table 15: HSG funding for accommodation projects

Project Type	Project Type Breakdown	Client Units (numbers)	Spend against Project Type (£)	Spend per Unit (£)
Temporary Supported Accommodation	Young people	1,071	14,195,300	13,254

4.21. This is the type of accommodation we would wish to see a local housing authority rely upon when providing homelessness assistance to young people. Due to the uncertainty of demand for this accommodation, it is difficult to estimate how much more will be required. It should be noted that whilst there are significant costs associated with temporary accommodation, the actual supervision of young people will be lower.

Notification of decisions following use of the right to review

42. If the local housing authority decides that the applicant can continue to occupy the accommodation (which, in the long term, is not reasonable to continue to occupy) for the purposes of the interim accommodation or the main housing duty (ss 68 or 75 HWA), the local housing authority will notify the applicant of its decision that accommodation is suitable and inform him or her of the reasons for that decision, of the possible consequences of acceptance or refusal of that accommodation and of his or her right to request of the decision on suitability (including at any time during the occupation of the accommodation). This will permit the applicant to raise any issue as to why the accommodation would not be suitable for his or her occupation even in the short or medium term.

Option 42.1: Business as usual

4.22. Data is not currently collected on the number of applicants who may challenge the decision of a local housing authority through their right of review provided by section 85 of the HWA 2014, in relation to suitability. Typically, a review will be conducted by an officer of the local housing authority not involved in the original

⁵³ Bed and breakfast and hotels, caravan parks or similar holiday accommodation and hostels (including reception centres and emergency units)

decision. The timescales for completing an application for review are prescribed in the Homelessness (Review Procedure) (Wales) Regulations 2015. Assuming officers undertaking this role would typically be employed with staffing costs of £43,000/year, or £22/hour, it may be possible to estimate future costs for to a local housing authority.

4.23. Maintaining current arrangements will provide limited savings to a local housing authority. Although data is not available, practice-based evidence indicates that that reviews are made infrequently as a proportion of all applications and do not generate significant financial burden, although they do impact on staff capacity and time.

Option 42.2: The proposal

Costs

4.24. The additional individual rights of review may generate further cost to local housing authorities. However, as with current arrangements, the number that are made will rely on the successful implementation of the legal reforms alongside existing homelessness assistance arrangements. Potentially there may be more issues arising as a local housing authority adapts to new duties and powers. Based on current available information, we consider that an overall estimate of cost would be overly speculative. The staff costs outlined for the business as usual option provide an appropriate estimate from which a localised calculation could be reached. For the final RIA we will gauge the current volume of reviews as an indicator of cost.

Benefits

4.25. We consider that this option will provide people with a clearer understanding of their rights and potentially avoid circumstances where they are unfairly prevented from receiving the assistance they are owed. We would anticipate that additional rights of review may ensure better engagement with local housing authorities, given that the applicant will know there are opportunities to challenge decisions if they believe they are not receiving the right level of assistance.

Amendments to the timeframe in which to request a review of suitability

43. The right to review a decision regarding suitability in relation to a local authority discharging their interim accommodation duty (s. 68 and s.82 of the HWA 2014) and their main housing duty (s.75) should be available at any time during the period of their occupation of the accommodation in question and that this right to request a review a decision must be made known to the applicant.

Option 43.1: Business as usual

4.26. The costs and benefits of this option are the same as for proposal 43.

Option 43.2: The proposal

4.27. The costs and benefits of this option are the same as for the proposal above. We anticipate the need to explore further any cost implications for the potential for increased review opportunities.

44. We propose the time frames in which a local housing authority should undertake and complete the review should be time limited, to minimise the potential duration of an individual being placed in unsuitable accommodation. Any request for review of the suitability of accommodation being occupied under the interim of main housing duties should be concluded and the applicant informed within three weeks of the request, or within a period agreed between the applicant and the reviewer in writing, should there be the need for extensive evidence gathering etc.

Option 44.1: Business as usual

4.28. The costs and benefits of this option are likely to be the same as for proposal 43.

Option 44.2: The proposal

4.29. The costs and benefits of this option are likely to be the same as for proposal 43. Those costs are not expected to be significant.

45. We propose this process and the right to review should be communicated to the individual, with steps taken to ensure that the process is understood, including any review decision.

Option 45.1: Business as usual

4.30. The costs and benefits of this option are likely to be the same as for proposal 43.

Option 45.2: The proposal

4.31. The costs and benefits of this option are likely to be the same as for proposal 43.

46. It is proposed the development of the Personal Housing Plan should support the evidence gathering of such reviews, and they should also be updated to record requests for reviews, decision outcomes and their reasoning. When the assessment of housing need and Personal Housing Plan are being reviewed by the local housing authority, that review should include a reconsideration of the suitability of the accommodation occupied by the applicant.

Option 46.1: Business as usual

4.32. Due to the limited data available on both the use of personal housing plans and assessment arrangements, it is difficult to provide a relevant estimate of costs to current arrangements, other than linking to the broad costs outlined in proposal 1 for a local housing authority in fulfilling their statutory duties. Proposal 2 in respect of personal housing plan and proposal 43 in respect of undertaken and considering reviews will also be relevant.

Option 46.2: The proposal

4.33. We consider that the costs and benefits of this option are captured in proposal 2.

Location

47. Accommodation cannot be deemed suitable unless it is located within reasonable travelling distance of existing educational facilities, employment, caring responsibilities, medical facilities and other support services including informal support network, unless the applicant wishes to move beyond a reasonable travelling distance from those facilities. The amendments should provide for an exception where interim accommodation is to be secured under s.68 HWA 2014 and no suitable accommodation is available. That exemption should be time limited for a maximum period.

Option 47.1: Business as usual

4.34. Homelessness assistance provided through section 73 and 75, with costs illustrated in proposal 1, is relevant to this option. Also relevant are the costs in connection with the use of HSG, set out under proposal 6 and the provision of temporary accommodation through the relief duty (section 73). Less reliable evidence

is available on the number or frequency of situations where issues may arise with the suitability of accommodation. It is consequently challenging to provide reliable estimates of cost where a local housing authority may offer unsuitable accommodation. The use of any type of accommodation for prolonged periods can be detrimental to the health and well-being of those living within them. For the subsequent version of this document, we will seek to obtain more relevant information on existing provision of accommodation and the impact this is having on current residents.

Option 47.2: The proposal

Costs

4.35. As with option 1, costs will link to existing provision of assistance through the existing duties. The proposed option will result in costs to the individual in being placed in unsuitable accommodation. We anticipate there to be potential impacts on the number of suitable properties available to local authorities, potentially increasing cost.

Benefits

4.36. However, there will be benefits in at least temporarily having improved accommodation than might otherwise be available and more broadly, reduce the pressures on existing services.

4.37. We anticipate that the mainstreaming of rapid rehousing and growth in social housing provision will impact positively against this proposal. A further consideration will be that the relevant costs of this proposal for single people will be lower than for families, of whom there are fewer living in inappropriate forms of temporary accommodation.

Taking into account wider support needs

48. The local housing authority be required to take into account, in relation to both the applicant and any member of the applicant's household, any specific health needs including any impairment, where the accommodation is situated outside of the area of the authority, the distance of the accommodation from the authority's area, the significance of any disruption caused by the location of the accommodation to the employment, caring responsibilities or education of the person and the proximity of alleged perpetrators and victims of domestic or other abuse.

A more general consideration of an applicant's wellbeing and access to support more generally, including non-family networks.

Option 48.1: Business as usual

4.38. Proposals 1 and 6 are relevant to this option in outlining the costs involved in providing assistance to individuals, along with proposal 21 in connection with accessible housing registers. Linked challenges were also reported in research

undertaken by Tai Pawb in identifying accommodation for people with protected characteristics.⁵⁴

Option 48.2: The proposal

Costs

4.39. The costs of this option cannot yet be predicted due to uncertainties over the scale of demand, against existing provision, where the support needs of an applicant have not been taken into account. We will attempt to develop a clearer baseline of evidence for the final version of the RIA.

Proposals for longer term improvement

49. We will review suitability standards every three years in order to assess whether developments in the supply of accommodation enable us to bring forward a higher level of minimum standards. In line with the recommendations of the Expert Review Panel, these higher standards may include:

- a) Whether to prescribe that overcrowded temporary accommodation is never suitable;**
- b) Whether to prescribe for living space to be separate to bedrooms;**
- c) Whether to prescribe more generous space standards for sleeping rooms;**
- d) Whether to prescribe minimum standards pertaining to access to private (as opposed to shared) access to facilities such as cooking and toilets.**

Option 49.1: Business as usual

4.40. The proposal outlined in option 2 will represent a new process not currently undertaken by the Welsh Government. However, the model of the WHQS could be a relevant approach to build on, where the quality social housing is assessed through a process of self-assessment. Details of that process are set out in guidance.⁵⁵ The advantage of a self-assessment model like WHQS is that the landlord is likely to have an understanding of the existing quality of accommodation and is likely to be monitoring it regularly rather than at a unique period of review. In the context of the WHQS, the approach adopted recognises the difficulty in monitoring the quality of existing social housing stock, currently consisting of more than 200,000 properties. Although far fewer properties are required for temporary accommodation, their numbers are still significant considering that more than 10,000 people are living in temporary accommodation.

⁵⁴ [Understanding the experiences of homelessness - Tai Pawb](#)

⁵⁵ [The Welsh Housing Quality Standard](#)

Option 49.2: The proposal

Costs

4.41. Defining the scope of a review of suitability standards will impact on the costs of that exercise. The review of standards would need to be undertaken every three years so we must anticipate an ongoing cost implication for Welsh Government. A short and limited exercise if designed effectively could cost a limited amount of Welsh Government staff time. An illustration of annual staff costs is provided in Table 16.

Table 16: An estimate of staff costs that could be allocated towards a review project

Staff costs	Annual salary plus on costs (£)	Daily cost (£)	Days required	Total (£)
EO	43,219	197	10	1,967
SEO	70, 507	320	5	1,600
Grade 7	90,165	409	5	2,045
				5,612

4.42. In order to obtain reliable data, action will be required to visit temporary accommodation settings to assess their quality or do so through a sample. As set out in option 1, the WHQS process of self-assessment could feed into a Welsh Government coordinated review. The criteria for assessment will determine its duration and complexity, which makes it difficult to estimate relevant costs for up to 10,000 properties. We will consider this option and alternative models for assessment for the final version of the RIA.

Benefits

4.43. We consider that the process of review will be valuable in ensuring that poor quality accommodation is not used for people who are homeless and in identifying opportunities to improve accommodation at risk of failing suitability standards. We would expect the review to encourage better planning and use of resources and help improve the health and well-being of individuals who use this accommodation.

Allocation of social housing

Social housing allocation is used to its greatest effect to prevent homelessness

50. An RSL cannot unreasonably refuse a referral from a local housing authority, within a specified timeframe, except in specified circumstances.

Option 50.1: business as usual

4.44. Section 95 of the HWA 2014 sets out the aspects of co-operation to be promoted between its officers of a local authority who carry out housing and social services functions that enable it to:

- Prevent homelessness.
- Provide suitable accommodation to a person who is or may be homeless.
- Provide satisfactory support to a person who is or may be homeless, and
- Enable the discharge of a local housing authority's homelessness functions effectively.

4.45. In fulfilling its homelessness functions, a local housing authority may request co-operation from a Registered Social Landlord. The Welsh Government does not collect information from local housing authorities about the frequency of such requests, but practice-based evidence suggests this is uncommon, with a reliance instead through informal agreements. In the context of housing of households who are homeless by a Registered Social Landlord, this will be arranged through nomination agreements of applicants for social housing, to be provided with a home, as a feature of a local housing authority's common housing register.

4.46. Data currently records the lettings for households re-housed on a priority basis due to homelessness.⁵⁶ The lettings (or allocation of social housing) rates vary across Wales, reflecting the complexity of arrangements, where there may be differences in the burden of responsibility in providing housing by the local housing authority or registered social landlord. Management data available to the Welsh Government showed that on average in 2021/22, 30% of local authority lettings and 23% of registered social housing lettings were made to homelessness households as a percentage of all lettings.

4.47. Housing need estimates show that 7,400 additional homes a year are needed until 2023/24, of which 3,500 are affordable homes. To support this aim, the Social Housing Grant (SHG) for 2023/24 has been set at £330m. The SHG funding process has been aligned more closely with evidence of local housing need, meaning that a local authority is required to produce a "prospectus" which outlines their strategic housing priorities for SHG, to be used to inform its rapid rehousing plan. Due to the recent introduction of this change, it is difficult to draw out relevant outcomes, but clearer findings should be available for future iterations of the RIA.

Option 50.2: The proposal

⁵⁶ [Social housing vacancies, lettings and arrears: April 2021 to March 2022 | GOV.WALES](#)

Costs

4.48. Given the collective and publicly stated commitment of Registered Social Landlords in Wales to tackle homelessness, only in rare instances would we expect it necessary for the proposed power to be used.⁵⁷ Consequently, a limited number of local authorities and Registered Social Landlords could be impacted at any point, rather than those impacts occurring widely across Wales.

4.49. A consequence of this option would link to the proportion of households a local housing authority might request to be offered accommodation. Although we anticipate that local authorities will continue to seek a balance between homes offered to households who are homeless and those with general needs, albeit increasingly favouring households who are homeless. A reduction may then be seen in numbers of people initially housed in temporary accommodation, bringing savings to those services. For a registered social landlord, due to its finite housing stock, costs may be neutral, as accommodation will be offered to a household which is homeless rather than to one with general housing needs. However, there may be greater risk in letting to larger numbers of households who are homeless, should that also equate to meeting greater support needs. We do not know if this will be the case, but it is important to note proposal 5 in this regard and the additional support we intend for those who need additional help to retain accommodation.

4.50. The complexity of factors makes it difficult to provide a reliable estimate of cost for this proposal, particularly as many local housing authorities may choose not to use the new power but rely instead on informal arrangements. As the White Paper sets out, we will continue to scope this option and to work to ensure it does not lead to re-classification of RSLs or impact their ability to borrow.

51. A power to remove people not in housing need from the waiting list.

Option 51.1: business as usual

4.51. A proportion of people who have applied for social housing will have done without having a social housing need at the time of the application, Whilst the estimates of cost in processing a housing application are lower than those for homelessness assistance, current estimates range between a low of £400 to a high of £800 per application. Once an application is registered, a local housing authority will need to review applications against the available housing stock after allocation to the appropriate band. Although applicants in these circumstances will have a lower priority than the majority of applicants, typically with greater needs, the time taken to consider an application and potentially respond to enquiries from the applicant will generate a cost.

4.52. The benefit of allowing any applicant the opportunity to apply for social housing, reflects the value of supporting a balance in the development of communities in which social housing exists. Such communities could avoid an imbalance of for example, single men, who tend to represent a higher number of homeless households with greatest housing need.

⁵⁷ [Community Housing Cymru \(chcymru.org.uk\)](http://Community Housing Cymru (chcymru.org.uk))

Option 51.2: The proposal

Costs

4.53. The costs associated with this proposal are likely to be irregular and variable between local housing authorities. The use of the power may depend on the priorities of an area, which may, for philosophical reasons wish to retain a policy permitting any person to apply for social housing. In future, social housing developments could grow sufficiently large that numbers on the waiting list reduce to a degree that demand is much lower.

4.54. Due to the absence of accurate data on people with no housing need who have applied for social housing, we cannot give an estimate of the costs to a local housing authority. Exploring the use of automation in data collection is an avenue we would propose exploring with local authorities; however, it's essential to acknowledge that this represents an initial cost investment in technology and infrastructure. Good practice would suggest that this task could be completed annually or biannually at minimal cost.

Benefits

4.55. Obvious benefits would result in staff time freed from repeatedly assessing applications and being freed to support those with greater housing need. In addition, we would expect increased clarity on current demand levels, helping inform service provision.

52. Providing 'additional preference' to those that are experiencing homelessness.

Option 52.1: business as usual

4.56. As outlined under proposal 51, data describes the priority lettings by stock retaining local authorities and registered social landlords to households who are homeless as a percentage of all lettings.⁵⁸ This option will maintain the current provision of social housing as managed through those local letting arrangements, providing housing by the local housing authority or registered social landlord.

4.57. Data is not currently available on the proportion of those who are let social housing who are already provided with additional preference. Therefore, distinguishing between those with a 'general' housing need and additional preference is not possible in terms of the costs resulting from existing letting arrangements. A more appropriate method of measurement comes through the costs to a household which is homeless and, in most cases, living in forms of temporary accommodation.

4.58. The health and well-being of households, child development and education, and adults' participation in the labour market and contribution to economic output can be impacted by unstable housing arrangements. This can lead to further demands on key services, which would otherwise be reduced, particularly as someone who is homeless will rarely experience that disadvantage alone. Many individuals will also experience negative impacts to their mental health and, for a significant number,

⁵⁸ [Social housing vacancies, lettings and arrears: April 2021 to March 2022 | GOV.WALES](#)

substance misuse also. The longer those experiences are felt, often the harder it will become to recover, which will require even greater support and cost.

Option 52.2: The proposal

Costs

4.59. The costs in connection with this option will be felt according to the degree to which additional preference will be awarded to households that are experiencing homelessness. This could result in significantly higher numbers of people are homeless benefiting from the option. Subject to the success of the option, costs could reduce for other key public services, with consequent benefits resulting in improvements to the well-being of people at risk of homelessness.

53. Providing 'additional preference' to care experienced people who are homeless and those fleeing abuse.

Option 53.1: business as usual

4.60. The White Paper outlined evidence suggesting that 6,018 young people were the lead applicant presenting to their local housing authority for homelessness assistance within 2022-2023 (the last full year for which we have data). Of these, 423 presentations were people aged between 16-17 years old, and 2,358 were legally owed a duty.⁵⁹ In the same year 16- and 17-year-olds were placed in temporary Bed and Breakfast accommodation on 114 occasions.⁶⁰ Care leavers aged 18 to 21 years old were placed in temporary Bed and Breakfast accommodation on 171 occasions.⁶¹ However, it is likely that this data under-represents the extent of homelessness amongst young people, which is likely to include forms of homelessness that are considered 'hidden', such as sofa-surfing and sleeping in cars.⁶²

4.61. A particular group of children and young people significantly overrepresented in homeless figures are those who are care experienced; one in three (33%) care experienced young people become homeless in the first two years of leaving care.⁶³ More than one in four of all young homeless people have been in care, with 26% of care experienced individuals having slept on friends or families' sofas, and 14% having slept rough on the streets.⁶⁴

4.62. Young people who are LGBTQ+ are known to be disproportionately affected by youth homelessness. The Albert Kennedy Trust found that 24% of the youth homeless population across the UK identified as LGBT.⁶⁵ This group may also be over-represented amongst care leavers who become homeless.

⁵⁹ [Households for which assistance has been provided by outcome, age and gender \(gov.wales\)](https://gov.wales/government/department-for-local-governments-and-housing/white-paper-for-local-governments-and-housing)

⁶⁰ Combining data on those placed under Homelessness and Social Services and Well-being legislation.

⁶¹ [Total placements in bed and breakfasts during the quarter](https://gov.wales/government/department-for-local-governments-and-housing/white-paper-for-local-governments-and-housing)

⁶² [Homelessness accommodation provision and rough sleeping: March 2023 | GOV.WALES](https://gov.wales/government/department-for-local-governments-and-housing/white-paper-for-local-governments-and-housing) – Please note this data has not undergone the same level of quality assurance as official statistics and the data may be revised in future.

⁶³ [Who cares? The Link Between Leaving Care and Homelessness \(stepbystep.org.uk\)](https://stepbystep.org.uk/who-cares-the-link-between-leaving-care-and-homelessness), cited in Review Paper: Considering recommendations on wider legislation Expert Review Panel, June 2023

⁶⁴ [Preventing Homelessness in Care Experienced Individuals](https://gov.wales/government/department-for-local-governments-and-housing/white-paper-for-local-governments-and-housing)

⁶⁵ [LGBTQ+ Youth Homelessness in Wales: Full Report August 2019](https://gov.wales/government/department-for-local-governments-and-housing/white-paper-for-local-governments-and-housing)

4.63. Data is only available for 2018-19 recording households threatened with homelessness due to a breakdown of a relationship with a partner due to violent circumstances. 543 households were eligible for assistance under the prevention duty (section 66), 1,194 under the relief duty (section 73) and 375 under the main duty (section 75).^{66 67 68}

Option 53.2: The proposal

Costs

4.64. As with the group who are experiencing homelessness and provided with additional preference, the costs resulting from this option will be dependent on the extent that additional preference is awarded to care leavers and those fleeing abuse against other groups with high levels of need and also in how it may seek to create a balance within its allocation of social housing.

Benefits

4.65. Providing additional preference to homeless care leavers and those fleeing abuse not only addresses the immediate needs of people experiencing homelessness but also has broader social and economic benefits by reducing homelessness and promoting well-being. It represents a compassionate and responsible approach to housing policy.

54. Requirement for Common Housing Registers.

Option 54.1: business as usual

4.66. 19 of the 22 local housing authorities in Wales have adopted common housing registers for their areas. Research conducted in respect of one local housing authority, which does not have a register considered the advantages and disadvantages of adopting a common housing register.⁶⁹ These included the costs to an applicant in registering with a range of social landlords and where necessary notifying them of changes of circumstance. There would need to be an implicit knowledge of the need or option to register with all rather than certain landlords. The local housing authority may also lack a broader understanding of the needs of people with housing need in their area without a common housing register, particularly if needed on individuals is not recorded accurately or consistently. Poor data collection and sharing between landlords could also generate cost and time through duplication of records stored and updated separately.

4.67. Benefits were felt through the additional choice available to an applicant and the autonomy that a social landlord would have in not being part of a shared register with other landlords. Due to the length of time that common housing registers have

⁶⁶ [Households found to be threatened with homelessness during the year \(Section 66\)](#)

⁶⁷ [Households found to be eligible, homeless subject to duty to help to secure during the year \(Section 73\)](#)

⁶⁸ [Households found to be eligible, unintentionally homeless and in priority need during the year \(Section 75\)](#)

⁶⁹ [Allocation-of-Social-Housing-Report.pdf \(sheltercymru.org.uk\)](#)

operated across Wales it is difficult to get a clear sense of the time and resource now required in establishing them, such as aligning IT and other processes.

Option 54.2: The proposal

Costs

4.68. This option will be localised to the three local housing authorities who have yet to adopt a common housing register. Costs would be anticipated in connection with the scoping and design of a register and consultation with relevant partners. Practical arrangements will then be required in developing application forms, ICT and database infrastructure and common forms of information and advice. These developments should be undertaken by involving tenants and those likely to apply for social housing, recognising the particular needs and circumstances of communities.

4.69. It may be possible for these local authorities to consider aligning a common housing register with those of neighbouring local authorities if regional registers exist or work together on a joint register as two of the local housing authorities share a boundary. Working in this way may lead to savings, but the particular model adopted should be determined locally to suit the interests of the local housing authority and its community.

Benefits

4.70. The benefits of a common housing register could be found for both landlords and would be tenants. Tenants are likely to encounter a simpler application process, which they may also feel is fairer than current arrangements where a common housing register does not exist. This can make it easier for a tenant to move between landlords and offer a wider choice landlord, location and type of accommodation to suit their needs. Landlords are likely to benefit from having a clearer appreciation of applicants in greatest housing need, enabling them to develop more effective housing plans for those on their register, such as avoiding potential voids. Higher tenant satisfaction will also bring benefits to the functioning of landlords, whilst a common system of work could improve efficiencies between landlords.

Application of the unacceptable behaviour test

55. The current test for unacceptable behaviour, which permits a local housing authority to exclude applicants from their allocation scheme, or to remove any reasonable preference from them should only apply where:

- **an applicant (or a member of his or her household) has been guilty of unacceptable behaviour, serious enough to breach s.55 Renting Homes (Wales) Act 2016 so as to result in an outright possession order; and**
- **at the time of consideration of the application, the applicant remains unsuitable to be a tenant by reason of that behaviour (ss.160A(7) and (8) and 167(2B) and (2C) Housing Act 1996.**

Option 55.1: business as usual

4.71. There is no nationally recorded data of the number of applicants for social housing who are prevented from applying due to unacceptable behaviour. Welsh Government understanding is that the test will be used rarely, where all other measures have been taken to support the applicant, making the costs associated with it limited. Where an applicant is excluded, they will nonetheless be eligible to receive homelessness assistance, which whilst offering stability to the applicant, is more costly than the provision of social housing. For the future version of this document, we will seek to obtain a clearer understanding of the volume of cases where the test is applied.

4.72. The benefits of this option are found in the challenging of behaviour which can undermine the ability of an applicant to succeed in their occupation contract. Significantly, the continuing homelessness assistance which will be offered, provides an opportunity to address the underlying issues in the behaviour of the applicant. If those issues are addressed, positive outcomes are more likely to result.

Option 55.2: The proposal

Costs

4.73. As outlined in option 57.1, due to the limited data available, we cannot confidently assess the costs for a test which may only be used in rare occasions. Based upon general estimates calculated by reviewing management data, local authority colleagues have indicated that the processing of a housing application would range from £400-£800. This can be compared with the costs from the three methods of assistance offered under sections 66, 73 and 75 of the HWA 2014 (which were outlined in Proposal 1), in the sense that the applicant may be assessed for homelessness assistance rather than social housing.

Benefits

4.74. The benefits of this option can be found in the balance it offers to a local housing authority in allowing them to address unacceptable behaviour of an applicant, but limiting the circumstances where this could occur. Doing so would be consistent with trauma-informed and person-centred practice. The proposed option should help ensure applicants engage effectively with local housing authority officers through a fair process.

55. Introduction of a ‘deliberate manipulation’ test.

Option 56.1: business as usual

4.75. The proposal outlined under option 2 is an innovation set alongside other proposed reforms in the White Paper and the business as usual model does not provide a suitable comparison.

Option 56.2: The proposal

Costs

4.76. The costs associated with this option would be felt in the application of this power by a local housing authority and the potential delay to an applicant seeking social housing engaged in deliberate manipulation. We anticipate that the deliberate manipulation test will be used rarely, given the current person-centred and trauma-informed approaches adopted by local housing authorities and their enhancement from the proposed legal reforms, which is a key outcome the Welsh Government wishes to see. This makes it difficult to provide an estimate of cost from the inconvenience of an application of social housing being delayed.

Benefits

4.77. The benefits of the option may have limited financial implications but ought to positively enhance relationships between applicants seeking housing and local housing authority staff and broader perceptions of equity for people using housing and homelessness services. The potential deterrent effect of the test will give confidence that there will be consequences to people who deliberately manipulate services.

Additional housing options for discharge of the main homelessness duty

56. An increased range of housing options through which the main homelessness duty at s.75 HWA 2014 can come to an end. This recommendation would allow a local housing authority to utilise these options only where the local housing authority is satisfied that the following conditions are met and only where the applicant agrees that the accommodation is suitable for the applicant and all members of his or her household to occupy and the accommodation is likely to be available for occupation by the applicant and all members of his or her household for at least 12 months. The main housing duty would not end if the applicant refuses such accommodation.

4.78. The following additional means of ending the main housing duty:

- Providing advice and assistance that has allowed an applicant who was homeless because he or she had accommodation, but it was not reasonable to continue to occupy (because of the risk of domestic abuse or other abuse or violence) to return to occupy that accommodation. Examples of such advice and assistance include helping an applicant to obtain an occupation order or other legal remedy to exclude a perpetrator,

installing physical safety features, helping the applicant to obtain advice to have the ownership or tenancy transferred to his or her sole name;

- Assisting the applicant into supported lodgings or other supported accommodation;
- Assisting the applicant to return to a home from which he or she was excluded by parents or family, for example providing mediation services.

4.79. We propose the following safeguards to accompany any of these additional discharge options:

- A written agreement such as an occupation contract (if appropriate) and/or statement of rights and responsibility.
- The applicant must have been notified in writing of the consequence of acceptance of the offer (that the duty will come to an end);
- An offer of such accommodation must be accepted in writing by the applicant if this option is to be utilised to end the housing duty. A refusal of such accommodation cannot lead to the main housing duty coming to an end, i.e. the applicant has a veto.
- Access to independent housing advice for the applicant prior to accepting an “additional option” accommodation.
- Written information to the applicant on their right to request a review of the suitability of the accommodation;
- Informing the applicant that he or she may make a new application for homelessness assistance the local housing authority if the agreement breaks down (and how to do so).
- In addition to the accommodation meeting all of the usual standards for ‘suitability’, the following must be confirmed:
 - 24-hour access to that accommodation.
 - adequate toilet and washing facilities.
 - access to kitchen facilities.
 - a private bedroom.
 - availability of living space where the applicant is living with children.

4.80. The local housing authority be under a duty to make contact with the applicant six months after acceptance of the offer in order to ascertain whether the accommodation continues to be suitable and/or whether the applicant is threatened with homelessness or homeless. If it appears to the local housing authority that the accommodation is no longer available to the applicant (or to all members of his or her household) or is no longer suitable, then the local housing authority should assist the applicant to make a new application for homelessness assistance (s.62(1) HWA 2014).

Option 57.1: Business as usual

4.81. Assessing the costs for this option is challenging in that the current process of ending homelessness assistance may involve costs similar to those incurred from completing an assessment of housing need through a personal housing plan, as outlined in Proposal 2. At this point, the applicant will most likely be accommodated in a form of temporary accommodation, depending on their needs and circumstance, which are costed under Proposal 6, through the range of accommodation types funded by the HSG. A calculation may then be made against costs of rehousing the applicant in a social or privately rented home, which based on local housing authority

estimates range from £400-800 per application. This methodology has not been tested yet, but for the final version of this document, we will assess its validity and whether it reliably records the costs incurred by a local housing authority.

4.82. The benefits of this option reflect the simplicity of the process based on the acceptance or refusal of an applicant. This may lead to efficiencies in the decision making of local housing authority officers and consequent savings in time. However, in returning to the potential costs of this option, the longer-term benefits may not occur unless enough safeguards are put in place to prevent homelessness being repeated. These are not guaranteed at present through the existing power and duties under the HWA 2014.

Option 57.2: The proposal

Costs

4.83. The costs of this option are likely to result from a more intensive and sustained form of assistance, along with an improved standard of accommodation when this is offered. Calculating a reliable estimate will link to assessments of need which are outlined in the costs for a personal housing plan. The Welsh Government has not yet been able to explore the potential costs of this option with local housing authorities which may involve additional staff time. We will seek to do that for the later version of the RIA.

Benefits

4.84. Benefits from this option should result from the additional support and consideration given to the needs of the applicant. The proposal will also widen the range of options available to local authorities and to applicants, hopefully leading to more efficient accommodation of some homeless people on the waiting list. The further steps taken by local housing authority officers should help ensure positive outcomes are achieved and homelessness is not repeated.

57. Additional individual rights of review – reasonable steps and suitability.

Option 58.1: business as usual

4.85. Data is not currently collected on the number of applicants who challenge the decision of a local housing authority through their right to request a review provided by section 85 of the HWA 2014. Typically, a review will be conducted by an officer of the local housing authority not involved in the original decision. The complexity of an application will affect the length of time required, but assuming officers undertaking this role will typically be employed with staffing costs of £43,000/year, or £22/hour, it may be possible to estimate costs for to a local housing authority.

4.86. Maintaining current arrangements will provide limited savings to a local housing authority. Although data is not available, practice-based evidence indicates that reviews are made infrequently as a proportion of all applications and do not generate significant financial burden.

Option 58.2: The proposal

Costs

4.87. The additional individual rights of review may generate further cost to local housing authorities. However, as with current arrangements, the number that are made will rely on the successful implementation of the legal reforms alongside existing homelessness assistance arrangements. Potentially there may be more issues arising as a local housing authority adapts to new duties and powers. Based on current available information, we consider that an overall estimate of cost would be overly speculative. The staff costs outlined for the business as usual option provide an appropriate estimate from which a localised calculation could be reached. For the final RIA we will gauge the current volume of reviews as an indicator of cost.

Benefits

4.88. We consider that this option will provide applicants with a clearer understanding of their rights and potentially avoid circumstances where they are unfairly prevented from receiving the assistance they are owed. We would anticipate that additional rights of review may lead to better engagement with local housing authorities, given that the applicant will know there are opportunities to challenge decisions if they believe they are not receiving the right level of assistance.

5. Implementation of the proposed reforms

59. The creation of a power by which the Welsh Government could ‘call-in’ data collected by a local housing authority when undertaking its homelessness functions. This would help identify suitable indicators of progress in implementing the reforms proposed by this White Paper and provide for detailed analysis of specific issues.

Option 59.1: business as usual

5.1. Data is collected from local housing authorities through annual returns and recorded on the Stats Wales website in respect of homelessness functions.⁷⁰ Welsh Government officials both record and analyse that data to observe trends and produce regular statistical bulletins. Management data also features in these arrangements and is published regularly.⁷¹ A proportion of officials’ time will be allocated to these activities alongside other data and statistical work.

5.2. Each local authority will have its own dedicated data collection or statistics teams aligned to these arrangements and possibly their own priorities in respect of homelessness, but also other policy and service areas.

5.3. These models of data collection are long established, having been developed to align with the HWA 2014 as well as earlier data requirements. As part of that process data collection arrangements will also be compatible with the Code of Practice for Statistics.⁷²

Option 59.2: The proposal

5.4. The proposed option is unlikely to alter the practice of collecting and analysing data and the standards that will be followed. The observable difference will involve the nature and type of the data collected from the current set of statutory and management data. New arrangements will come with costs in stopping what is currently collected and analysed and any possible additional data requirements. These further requirements have not been agreed upon yet, and it may not be possible to define until legislative reforms are made. As with any data project, an exercise will be needed to develop a data collection regime (including the need to develop a new digital solutions) and the Code of Practice for Statistics suggests a framework for doing so, which the Welsh Government would wish to follow, in line with its own custom and practice. We will aim to provide a clearer indication of costs for the later version of the RIA, building on work already underway within Welsh Government to better understand individual case-level data.

5.5. Subject to the legislative reforms being agreed, the existing data collection arrangements are likely to be incompatible with the observable practice of local housing authorities. There will be obvious benefits in establishing a power from which new data can be collected to assess the impact of the legislative reforms and key outcomes.

⁷⁰ [Homelessness \(gov.wales\)](https://gov.wales/homelessness)

⁷¹ [Homelessness accommodation provision and rough sleeping | GOV.WALES](https://gov.wales/homelessness-accommodation-provision-and-rough-sleeping)

⁷² [Code of Practice for Statistics \(statisticsauthority.gov.uk\)](https://statisticsauthority.gov.uk/code-of-practice-for-statistics)

Post implementation review

5.6. The case for change in the White Paper sets out the need to reform the current provision of homelessness assistance and its alignment to rapid rehousing. To understand how the proposals deliver against those aims, we will complete a process of review, monitoring and assessment. This will focus on both the reform to the existing arrangements under the HWA 2014 and the key innovations we hope to develop, coming through wider public service duties, targeted prevention for priority groups, improved access to housing and the implementation process itself. Elements of the proposals will impact directly on specific areas of policy and practice, whilst others will touch upon multiple areas, requiring specific consideration.

5.7. Evaluation of the HWA 2014 has relied upon a consistent and reliable set of statutory and management data collection, along with periodic research and studies into its impact. These regimes can be built upon, but a fresh set of measures of progress will also be required. We would want this to focus on the needs of individuals, drawing on the experiences of people with lived experiences of homelessness and those who may be at greater risk of homelessness, including people with protected characteristics, to assess the interaction with homelessness services. This work will come with its own challenges, recognising the complexities in obtaining evidence through quantitative methods and that which is available from more lengthy and qualitative work.

5.8. We recognise the scale and ambition of the proposed reforms and the challenging landscape in which they will be introduced. We will work closely with stakeholders to assess and scope implementation planning and recognise that aspects of the reforms may require a phased process of commencement, which will affect the arrangements for review. We will aim to set out a timetable for how this may be done with the later version of this document. This is likely to include research evaluating the reforms within two years of it coming into force.

CYNGOR GWYNEDD – Report to Cyngor Gwynedd Cabinet

Title of Item:	Collaboration Plan Approval (Wales Coastal Monitoring Centre)
Cabinet Member:	Councillor Berwyn Parry Jones
Relevant Officer:	Steffan Jones, Head of Highways, Engineering and YGC
Date of Meeting:	20 February, 2024

1.	DECISION SOUGHT
1.1	Give Gwynedd approval to continue to work with and devote resources to the Wales Coastal Monitoring Centre.
1.2	Delegation of authority to the Head of the Highways, Engineering and YGC Department in consultation with the Head of the Legal Department to approve the Collaboration Agreement.
2.	THE REASON WHY THE CABINET MUST MAKE THE DECISION
2.1	The purpose of this report is to receive confirmation of Gwynedd's contribution as a Board Member of the Wales Coastal Monitoring Centre, to present the Collaboration Agreement drawn up by the Consortium and to formally accept it.
3.	INTRODUCTION AND RATIONALE
3.1	Improving cohesion and consistency in coastal monitoring and data collection underpins decisions on flood risk management and coastal erosion in Wales and is a priority of the National Flood and Erosion Risk Management Strategy in Wales.
3.2	In 2018, the go-ahead was received from the Welsh Government to re-establish the Wales Coastal Monitoring Centre (WCMC). The main purpose of the Centre is to monitor the physical change of the Welsh coast and therefore to produce a standard and cost effective coastal monitoring programme on behalf of the Welsh coastal Local Authorities. In addition, the centre is responsible for producing evidence that underpins flood and coastal erosion risk management decisions.
3.3	The WCMC Is funded entirely by the Welsh Government. It provides key information in monitoring physical changes on the entire Welsh coast. This is done by dividing the coastline into work packages and ensuring that recurring surveys are carried out by tendering the work to contractors/surveying companies, and then analysing the results. Through Gwynedd Consultancy (YGC), Gwynedd is one of the these contractors.

3.4	Coastal Local Authorities are defined as Risk Management Authorities with statutory functions according to the Flood and Water Management Act (2010). These responsibilities include inspecting and maintaining coastal defences, and monitoring beach levels and the pattern of any changes that are essential to determine the threat level to our defences over time.
3.5	WCMC staff are employed by the Vale of Glamorgan Council. The Centre is managed by a board of three coastal Local Authorities (Vale of Glamorgan, Conwy and Gwynedd) as well as the Welsh Local Government Association. As part of the board leading WCMC, Gwynedd Council contributes and influences its strategic direction on behalf of all Welsh coastal Local Authorities within a national regime (see Figure 1)
	Figure 1. <pre> graph BT WelshMinisters[Welsh Ministers] <--> FCRPB[Flood & Coastal Risk Programme Board] FCRPB --> FCEC[Flood & Coastal Erosion Committee] FCEC --> WCMC[Wales Coastal Monitoring Centre] FCEC --> WCGF[Wales Coastal Group Forum] FCEC --> RFG[Regional Flood Groups x 3] WCGF --> CG[Coastal Group x 4] RFG --> WFG[Wales Flood Group] </pre>
3.6	Those organisations have been working together since 2019 and wish to formalise this relationship to ensure continuity of monitoring services. The aim is to establish and improve a national network of constant coastal monitoring to improve strategic decision making and avoid assumptions and uncertainties.
4.	THE RATIONALE AND JUSTIFICATION FOR RECOMMENDING THE DECISION
4.1	Gwynedd's coastline covers 180 miles, with around 15 miles protected by structures owned by the Council. These defences are primarily located to protect our communities, and their age and condition vary widely from location to location. Reliable coastal data is vital for the Council to be able to recognise long-term patterns and prepare to protect our communities for the future.
4.2	YGC as a contractor to WCMC provides staff to carry out the coastal surveys within Gwynedd, and also assists in Ceredigion and Anglesey as resources allow. This generates income of approximately £35k annually and also improves the skills of YGC staff, who can then use those skills on other projects on behalf of the Council. YGC has also assisted WCMC to invest in appropriate inspection equipment which is also available for work programmes except for coastal monitoring.
4.3	Maintaining this income stream provides a solid basis to enable YGC to extend surveying capacity into the future, not only on our coast but generally as an integral part of project development needs wherever they are.

4.4	If the agreement is approved, YGC will not be forced to compete for the work.
4.5	By contributing to the management of WCMC Gwynedd Council demonstrates an ambition to be at the forefront of coastal management in Wales, for the benefit of all Gwynedd residents.
4.6	It was the legal teams of all Local Authorities who started the work of drafting the WCMC board agreement. Over time, however, it became clear that it would be better to have an independent, external legal position in formulating the text of the agreement. Due to Covid, there was a delay before the final version was presented to the Local Authorities. Although there is little risk associated with co-operating with other like-minded Local Authorities, it is now necessary to formalise the agreement in order to comply with each Authority's contract procurement rules. The Collaboration Agreement was drawn up on behalf of the parties and Gwynedd Council is now seeking approval to sign that agreement.
5.	NEXT STEPS AND TIMETABLE
5.1	Remain a WCMC Board Member, confirm Gwynedd Council's acceptance of the collaboration agreement and delegate authority to the Head of Highways, Engineering and YGC Department in consultation with the Head of Legal Department to approve any future changes in the agreement on behalf of the Council.
6.	VIEWS OF STATUTORY OFFICERS
	Chief Finance Officer: I am satisfied that the decision sought will not create a commitment for additional resources – where there is reference in the decision sought to devoting resources, this refers to the service's current resources. I welcome the intention to formalise the arrangements, as outlined in the report. Monitoring Officer: I am satisfied with the propriety of the recommendation.

CYNGOR GWYNEDD – Report to Cyngor Gwynedd's Cabinet

Item title:	Reforming the Council Tax Regime - Welsh Government Consultation: Fairer Council Tax: stage 2
Cabinet Member:	Y Cyng. Ioan Thomas, Finance Cabinet Member
Relevant officer:	Dewi Morgan, Head of Finance
Date of meeting:	20 February 2024

1. DECISION SOUGHT:

- 1.1 Cabinet is asked to approve the content of the draft response to the Government's consultation on reforming Council Tax in Wales, which is presented in the Appendix.**

2. THE REASON WHY CABINET NEEDS TO MAKE THE DECISION:

- 2.1** The Welsh Government is consulting on Council Tax reforms in Wales, mainly on how far reform should go, and how quickly this should be undertaken. The Cabinet is asked to give its approval to the draft response because of the potential repercussions the proposed changes can have on Gwynedd residents and the Council's budget.

3. INTRODUCTION AND RATIONALE

3.1 Background/ Introduction

- 3.2** The Co-operation Agreement between the Welsh Government and Plaid Cymru was announced on 1 December 2021. The agreement outlines how the Government and Plaid Cymru would work together over the following three years on policies where there is a common interest.
- 3.3** One of the commitments in the agreement is council tax reform, which is described in it as one of the least fair forms of taxation – one that disproportionately affects the poorer areas of Wales.
- 3.4** The Co-operation Agreement sets out the following (in the full policy programme):

9. Council tax reform

Local government finance is another area requiring overdue reform. Council tax is one of the most regressive forms of taxation and disproportionately impacts on poorer areas of the country, therefore exacerbating longstanding geographic inequalities.

Plaid Cymru and the Welsh Government will work jointly to reach a decision on council tax reform to make the system fairer and more progressive.

- 3.5** In light of the Co-operation Agreement, the Welsh Government's 2021 to 2026 programme for government states:

We will:

Seek to reform council tax to ensure a fairer and more progressive system.

- 3.6** Prior to the Delivery Agreement, during the 2016-2021 term of the Senedd, the Welsh Government set about creating a research programme supported by the expert-led Local Government Finance Reform Working Group, which included economists, statisticians, tax and benefits experts, equalities organisations and local authority practitioners.

3.7 The results of the research, "Reforming Local Government Finance in Wales", were published in February 2021. This research involved considering different forms of local taxation to fund local government, including Land Value Tax, Local Income Taxes or Council Tax Reform:

[Reforming Local Government Finance in Wales: Summary of Findings](#)

3.8 After considering all the research, the Welsh Government decided in the short to medium term to go down the route of reforming the current system rather than introducing an entirely new tax regime.

3.9 An initial consultation ("phase 1") was held in the field during 2022. The consultation sought views on the following:

- Revaluation of property, creation of new bands and tax rates
- Setting up rolling revaluation cycles
- How property extensions/improvements are considered
- Taxpayers' appeal rights, improving transparency and sharing more data.

3.10 The Government have also committed, *"In redesigning the system, in terms of the choices we make about the tax bands and tax-rates, we would not seek to increase the total amount of Council Tax raised overall from Council Taxpayers than is currently raised, although some taxpayers would see changes."*

4 CURRENT PROPOSALS

4.1 Since 1993, Wales is the only country in the UK to have revalued domestic properties for council tax so that bills were based on property values in 2003. This revaluation became effective from 2005 onwards. Currently, there is no statutory requirement to regularly update property valuations in the future.

4.2 The current consultation ("phase 2") makes specific proposals for reform in a number of areas tested in the original consultation in relation to some of the discount and exception categories. Consultation questions can be found in the Appendix.

4.3 Around 1.5 million domestic dwellings in Wales are liable to pay Council Tax. All properties are currently placed in one of nine tax bands, A to I, based on property values as at 1 April 2003. This is because, the last time Council Tax was updated in Wales, the changes came into force on 1 April 2005. As part of those changes, the Welsh Government added a new tax band (Band I) for the highest value properties. Council Tax in England and Scotland is still based on property values in 1991 and eight tax bands.

4.4 As part of the work since the first consultation, the Welsh Government has asked the Valuation Office Agency to undertake a property revaluation exercise. According to the Government, *"the Agency prepares current values for all 1.5 million dwellings in Wales by using the latest technology that is internationally accredited by industry experts."*

Three options are offered:

4.5 Option 1 – revaluation only (i.e. small scale reform)

This would be minimal change focussing on ensuring the property values are up-to-date. In this approach, the current system which is already in place would be kept largely the same:

- revalue properties for the purposes of placing them into a more modern version of the current 9 bands (keeping the same percentage of properties in each band as there are currently), and update the band thresholds to create an up-to-date system that reflects modern property values, but
- retain the 9 bands and the tax-rates charged for each band that we have at the moment.

4.6 Option 2 – change the relative size of the Bands (modest reform)

This would be a modest reform consider a modest scope of reform, addressing the outdatedness of the current system and also its regressive nature. In this approach:

- the 9 band structure would be retained and updated with current property values (as Approach 1), but also
- change the tax-rates charged for each band so that bills for households in lower band properties would fall, and bills for those in the highest band properties would rise.

4.7 Option 3 – more bands (wider reform)

In the third approach, the benefits of reform would be expanded, making the system more progressive:

- increase the number of bands from 9 to 12
- add 3 new bands, 1 at the bottom and 2 at the top
- redraw the new 12 bands so that the width of each band is broadly consistent across the whole structure
- change the tax-rates charged for each band, with a lot less paid by those in the lowest bands, and more paid by those in the top bands.

5. TIMETABLE

5.1 As well as consulting on these methods, the Welsh Government is also consulting on the pace of any change:

- fastest timeframe: small, modest or wider scale reform by 1 April 2025
- slower reform: small, moderate or wider scale reform, starting in 2028
- phased reform: small- or moderate-scale reform in 2025, moving to wider reform during the term of the next Senedd.

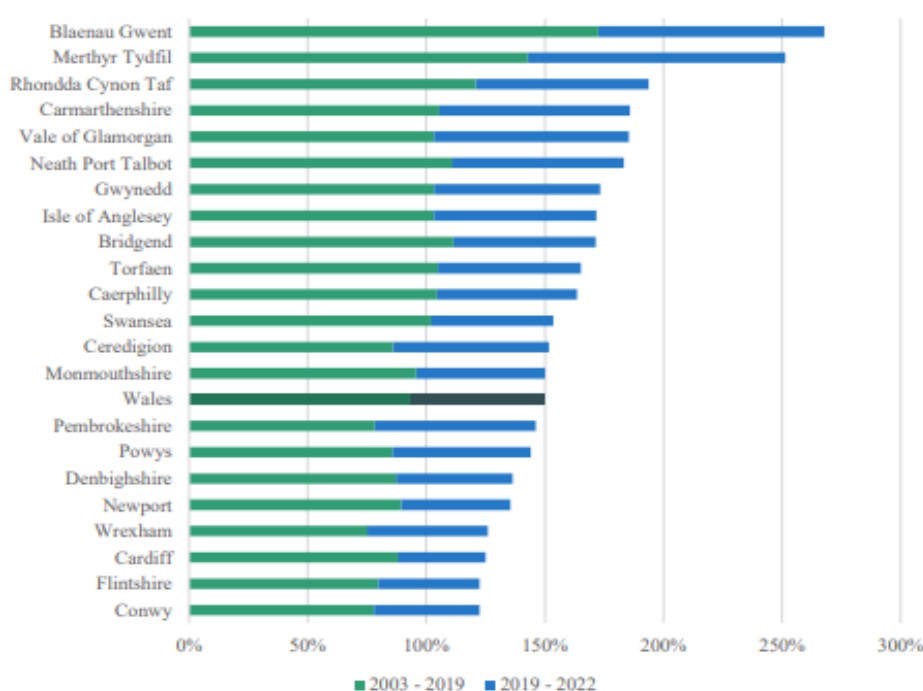
5.2 The Valuation Office Agency would have to undertake an exercise to revalue properties. By law, all property must be revalued on a common valuation date (the Antecedent Valuation Date). This date would apply to all properties, until the next revaluation exercise.

5.3 By law, a draft valuation list of new bands for each property must be published on 1 September, 7 months before the following 1 April in the financial year when a new Council Tax system would take effect. In other words, if a new valuation list comes into force on 1 April 2025 the Valuation Office Agency will have to publish the draft valuation list on 1 September this year – in just over 6 months.

6. THE IMPACT ON GWYNEDD

6.1 On average, the price of properties in Wales has increased by around 150% between 2003 and 2022. However, progress across Wales has not been consistent, as can be seen in the graph below from the Institute for Fiscal Studies (IFS) report:

Figure 2. Change in estimated average property value by LA, Q1 2003 onwards



Source: Authors' calculations using HM Land Registry (2022).

6.2 As seen above, Gwynedd has seen the 7th highest increase throughout Wales during the period, and is around 170%. The result is that a higher than average number may move up at least one band in Gwynedd than in some other areas.

6.3 Currently, the distribution of Gwynedd properties by Council Tax band is as follows:

Band	Property values on 01/04/2003	Tax rate compared to band D	% of properties (Gwynedd)	% of properties (Wales)
A	Up to £44,000	6/9	14.83%	14.49%
B	£44,001 to £65,000	7/9	25.39%	20.77%
C	£65,001 to £91,000	8/9	20.31%	21.77%
D	£91,001 to £123,000	9/9	17.24%	16.29%
E	£123,001 to £162,000	11/9	13.32%	13.49%
F	£162,001 to £223,000	13/9	6.42%	8.22%
G	£223,001 to £324,000	15/9	2.02%	3.71%
H	£324,001 to £424,000	18/9	0.33%	0.88%
I	Above £424,000	21/9	0.14%	0.38%
			100.00%	100.00%

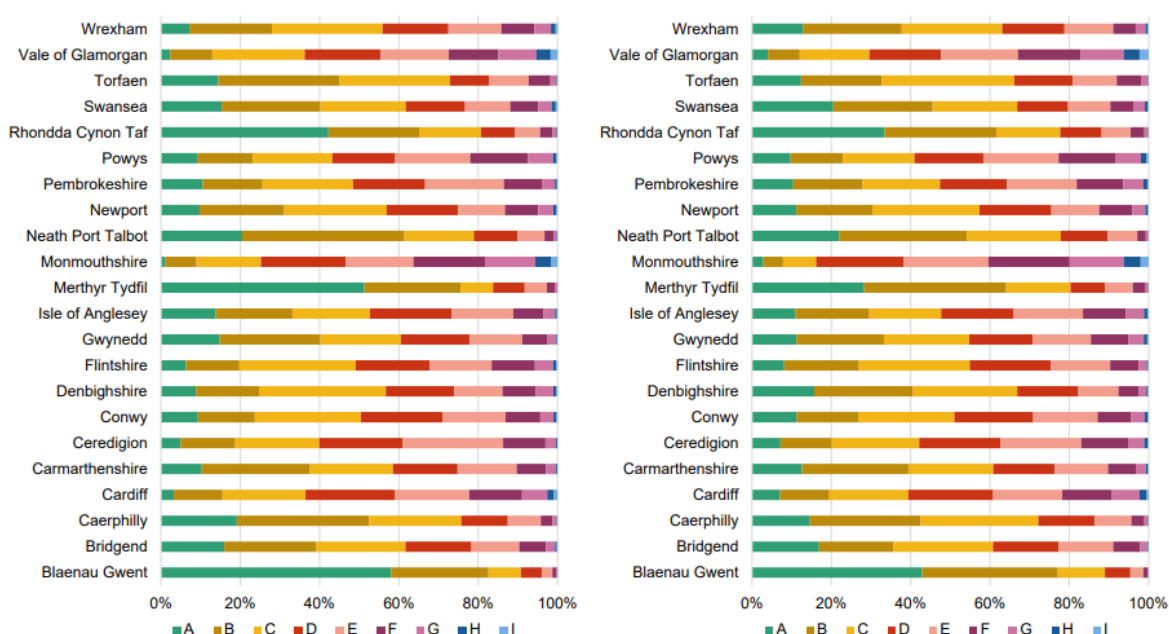
6.4 **40% of Gwynedd properties are currently in band A or B, with almost 78% in band D or below.**

6.5 The Institute for Fiscal Studies has undertaken further studies, based on the information they have received from the Office of National Statistics, which shows what percentage of households would be in each band if revaluation were to take place. Here are their conclusions for Gwynedd property bands should revaluation take place in accordance with what is set out in the advisory document:

Band	Current	After revaluation
A	14.83%	11.25%
B	25.39%	22.00%
C	20.31%	21.52%
D	17.24%	16.01%
E	13.32%	14.67%
F	6.42%	9.41%
G	2.02%	3.92%
H	0.33%	0.86%
I	0.14%	0.36%

6.6 **Due to the changes in house prices within Gwynedd since the last revaluation, the number of properties in band A or B would fall to 33%, and the number in band D or below would fall to 70%.**

6.7 The impact of this on the whole of Wales can be seen in the picture below:



Current Distribution

Proposed Classification

6.8 The advisory document does not specify how the Council Tax bills of the "new" bands under Option 2 would compare with the current regime, but the IFS has used the following example:

Band	Tax rate compared to band D (current)	Example of a revised version (IFS)
A	6/9	5/9
B	7/9	6/9
C	8/9	7.5/9
D	9/9	9/9
E	11/9	12/9
F	13/9	15/9
G	15/9	18/9
H	18/9	22/9
I	21/9	27/9

6.9 That is, Band A to C would pay less than now, but bands E to I pay more, with the increase gradually greater (band E going from 11/9 to 12/9 from band D, but band I going from 21/9 to 27/9).

- 6.10 Using Option 3, which is more bands, very few properties would take advantage of the new band at the bottom, and only 0.18% of the properties in Gwynedd would be in the new high bands, J and K.

Band	Current	Approach 3
A1		1.84%
A	14.83%	8.35%
B	25.39%	20.78%
C	20.31%	20.49%
D	17.24%	17.66%
E	13.32%	14.51%
F	6.42%	9.67%
G	2.02%	4.63%
H	0.33%	1.50%
I	0.14%	0.41%
J		0.12%
K		0.06%

- 6.11 The Institute for Fiscal Studies study clearly shows what the financial impact of the changes would be on Gwynedd households. At the date of the data used, there were 61,507 households in Gwynedd:

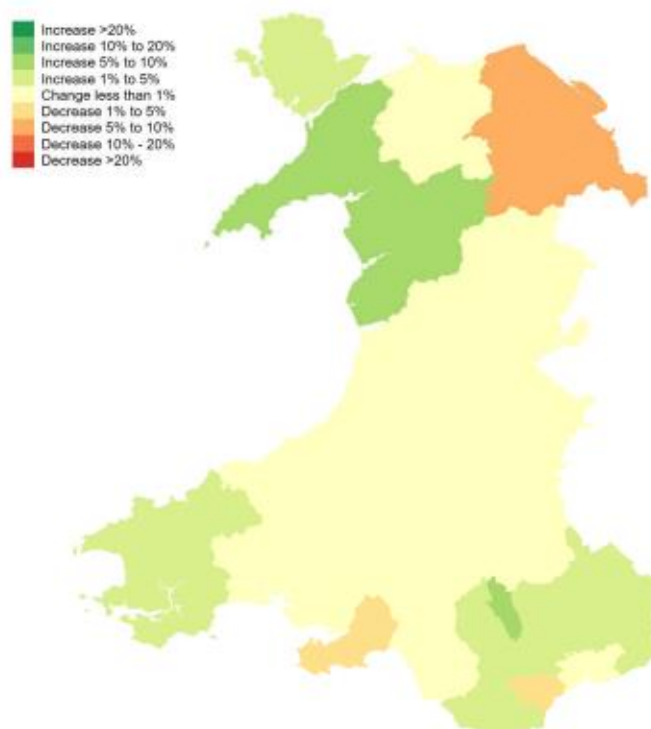
Change in bill	Number of households affected		
	Approach 1	Approach 2	Approach 3
<-£1,000	68	35	23
-£1,000 to -£500	384	743	5,263
-£500 to -£250	2,989	8,144	13,535
-£250 to -£100	5,932	18,455	9,110
-£100 to -£50	0	433	0
-£50 to 0	29,188	7,574	4,379
£0 to £50	0	0	4,942
£50 to £100	0	4,624	3,562
£100 to £250	10,749	6,716	4,755
£250 to £500	8,158	3,731	6,901
£500 to £1,000	3,097	8,019	5,174
>£1,000	942	3,033	3,863
Total households	61,507	61,507	61,507
Source: IFS – <i>Assessing the Welsh Government’s consultation on reforms to Council tax</i>			

- 6.12 This table shows around 9,000 households would pay over £500 more Council Tax under method 3, with almost 4,000 paying over £1000 more. However, under Option 2 over 11,000 households would be over £500 more and it could be seen that Option 3 was better for Gwynedd residents than Option 2:

	Option 1	Option 2	Option 3
Pay Less	15%	45%	45%
Pay roughly the same*	47%	12%	15%
Pay more	37%	42%	39%

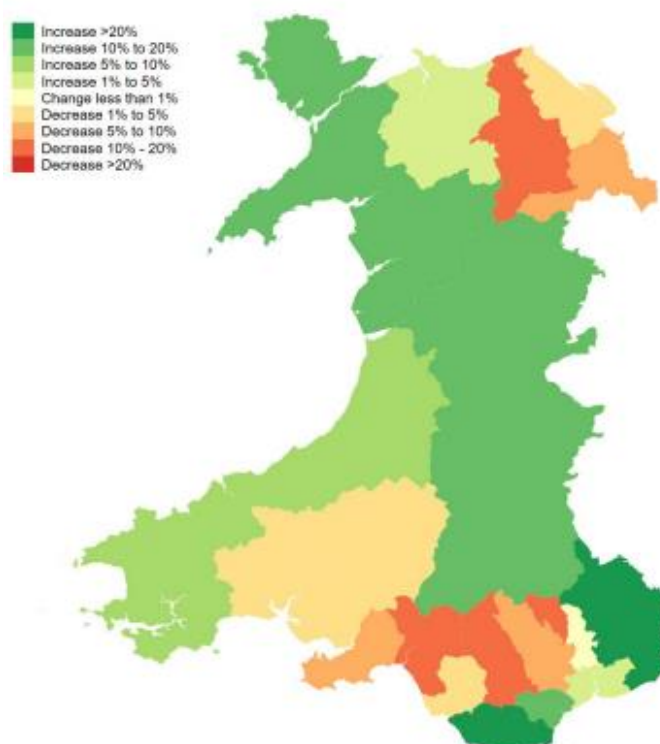
*Less than+/- £50

- 6.13 To put the difference in more starkly, the map below shows the change in average bills for each local authority in Wales should Option 1 be adopted, introducing only a revaluation. As can be seen, Gwynedd will have more increase in its taxbase (i.e. the number of properties once converted to the equivalent of Band D) than more or less any other county in Wales:



Map 1: Change in Taxbase on revaluation basis only

- 6.14 If Option 3 were introduced, Gwynedd would still see a 10% to 20% increase in its taxbase, but it would not be as exceptional, and two authorities (the Vale of Glamorgan and Monmouthshire) would see even more increases.



Map 2: Change in Taxbase based on second pricing and introduction of new bands (wider reform)

7. CONCLUSION

- 7.1** In summary, therefore, it appears that significantly more Gwynedd taxpayers (between twice and four times as many) will lose than would gain under any of the reforms proposed. Although the figures in the studies that have been carried out so far are on a theoretical basis, overall there is a strong possibility that around 40% of people in Gwynedd will pay hundreds of pounds more tax as a result of the reforms.
- 7.2** It should also be noted that any overall increase in the Council's taxbase (i.e. the number of properties equivalent to Band D) means a corresponding reduction in the grant received by the Government. The Government's argument is of course that the Council receives more Council Tax so it does not need as much of a grant to meet its spending needs, but collecting Council Tax is increasingly difficult.
-

Views of the local member

Not a local issue

Views of statutory officers

Monitoring Officer:

No observations to add in relation to propriety.

Head of Finance:

Author of the report.

DRAFT CONSULTATION RESPONSES

Question 1

What Council Tax band are you currently in? Please choose an option, you may wish to refer to your latest Council Tax bill or you can check your Council Tax band by looking up your address or postcode..

Not applicable.

Question 2

Which council area do you live in?

Cyngor Gwynedd

Question 3

The Welsh Government has shown 3 possible approaches for how to design a fairer Council Tax system. We want to ask you about your appetite for reform.

Do you think we should aim for:

- Approach 1: minimal reform
- Approach 2: modest reform
- **Approach 3: expanded reform ✓**
- other (detail)

Comments:

We support the principle of a fairer tax system, and given three options on offer we believe that there is a need to move forward to having a system that meets the aspiration of reducing the inherent inequities currently in the council tax system. The background information offered in the advisory document suggests that Method 1 and Method 2 would negatively affect people living in rural and coastal areas disproportionately and unfairly.

Any of the three approaches suggested will affect negatively people who have seen an increase in the value of their homes but whose income has not increased proportionally to this. There is a real risk that people in some rural areas will not be able to afford to pay the tax and will be forced to leave areas they have lived in all their lives.

Question 4

The Welsh Government has described when the changes could be made to the Council Tax bands and tax-rates. Again, we want to ask about your appetite for reform:

Do you think we should make changes based on:

- the fastest timetable: minimal, modest or expanded reform by 1 April 2025
- **slower reform: minimal, modest or expanded reform starting in 2028**
- staged reform: minimal or modest reform in 2025, moving to expanded reform in the next Senedd term
- Other (detail)

Comments:

We do not believe that reform within the April 2025 timeframe is realistic given the work that needs to be carried out by the Valuation Office Agency as the experiences of the authority suggest that the Agency does not have the necessary capacity to cope with the detailed work required and the substantial appeals that will be submitted. The Government need to be transparent about the appeals regime and give the regime more visibility. Our understanding is that a taxpayer appeal would be tantamount to an appeal on the tax at the county level, not for individual properties.

As noted in our response to question 3, we believe that Approaches 1 and 2 are more unfair on rural areas than Approach 3 so if reform is to take place, Approach 3 should be aimed for immediately and not introduced following a transitional period (i.e. Method 1 or 2 initially) as that would provide no support.

Question 5

Do you agree there should be an overall time-limit on Exemption F to discourage properties being left empty and exempt from Council Tax for an indefinite period?

A Class F exemption is currently granted for property that has not been occupied since the death of a former resident if the only person liable for paying Council Tax would be the deceased's personal representative, and no probate or letters of administration have been granted.

Yes

Question 6

What do you consider is a reasonable period for obtaining probate or letters of administration?

- 2 years
- **3 years ✓**
- 4 years
- Other (detail)

Comments:

Some difficult, sensitive cases following an individual's death mean that probate cannot be dealt with within the usual time, and generally no reason can be seen for deliberately delaying probate. However, we have a concern about properties being left empty with several years, and while this is not necessarily done to avoid the tax, it continues to create social problems. We therefore consider that a limit needs to be set, and that 3 years is a reasonable one.

Question 7

We found overwhelming support to change the title 'severely mentally impaired' and we propose the following options for a new title:

- Option A: significant brain impairment
- Option B: significant brain condition

Which title do you think should replace the term 'severely mentally impaired'??

We were using the terms "Serious Learning Difficulties or Mental Health Disorders" for a time on Council documents before the Welsh Government insisted that a standard form be

used with the wording 'severe mental impairment'. Two options are offered, namely Option A: significant brain impairment or Option B: significant brain condition.

Of these two, we would favour Option B.

Question 8

Do you agree with the definition proposed to describe a person with an impairment or significant brain condition?

This is the definition: " Significant (and permanent) mental condition or change that impacts on the brain's ability to function.."

- **Yes ✓**
- No
- Any other opinion (detail)

Comments:

We believe that the issue is thorny and difficult to define, and it is not necessarily one that experts in local government finance will be best placed to answer.

Question 9

Do you have any views on the qualifying criteria for a person with a significant brain impairment or condition to be entitled to an exemption or disregard?

The current qualifying criteria is that a person is entitled to a relevant benefit and medical certification from a registered practitioner.

- Option A: remove the requirement that a person must be entitled to a relevant benefit in order to qualify for exemption or disregard, but retain the need for medical certification.
- **Option B: when a person is able to give proof of clinical diagnosis, the requirement that a person receive a relevant benefit may be removed at the discretion of the local authority. ✓**
- Other (detail)

Comments:

Unfortunately any change like this is potentially going to be subject to abuse. We do not think it is fair to expect local taxation officers to use their discretion in an area as thorny as this, and medical certification should be obtained as a minimum.

The experience of taxation officers shows that the requirement for evidence of a relevant benefit is an important one. In practice, following publicity campaigns, some taxpayers or their representatives contact the Council to enquire about this exemption but do not claim the benefit – although they may qualify. This is therefore a way to enable Council officers to signpost taxpayers to the relevant benefit.

Question 10

We would like to know your views on the effects that these proposals 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?

There is a risk that significant increases to Council Tax bills in rural areas due to increases in house prices (often as a result of an area being attractive as locations of second homes and holiday cottages and not as a result of any action by the individual taxpayer) could have a negative impact on these areas. We are concerned that many Welsh people in Gwynedd will have to sell their properties as they could not pay the higher tax as their income is low despite an increase in the value of their asset.

Question 11

Please also explain how you believe the proposed policy approach 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

In carrying out a re-valuation, the Welsh Government is putting pressure on the Valuation Office Agency not to treat rural areas as "wealthy" as incomes are not low in these areas.

Question 12

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

Consideration should be given to offering an exemption or discount for property adapted for a disabled person's purposes, rather than the current tax band reduction regime. This is because a number of adjustments are now common for many taxpayers, whether they are disabled or not (e.g. a "walk-in" shower). We believe this discount needs to be related to the person, not the property.

CYNGOR GWYNEDD - Report to Cyngor Gwynedd Cabinet

Title of Item:	Cyngor Gwynedd Plan 2023-2028 – 2024/25 Review
Cabinet Member:	Councillor Dyfrig Siencyn
Relevant Officer:	Dewi W. Jones, Council Business Support Service Manager
Date of meeting:	20 February, 2024

1. Decision Sought:

- 1.1 Cabinet approval of the Cyngor Gwynedd Plan 2023-2028 – 2024/25 Review (the Plan) to be submitted to Council on 7 March 2024.

2. The reason why the Cabinet needs to make the decision:

- 2.1 To ensure that there is agreement on the content of the Plan, including any updates that have been made to it, before it is presented to a meeting of the Full Council for adoption at its meeting on 7 March 2024.

3 Introduction:

- 3.1 The Council Plan 2023-28 was originally adopted by the Full Council at its meeting on 2 March 2023. The Plan is our public statement as a Council of what we intend to achieve for the people of Gwynedd. It states our vision and ambition for the 5 years together with the projects we will deliver.
- 3.2 A new Plan was developed last year following a rigorous procedure and identifying a number of new priorities that aim to respond to what matters to the people of Gwynedd for the period of stabilisation and rebuilding post pandemic.
- 3.3 The Plan comprises a series of projects for the five years 2023-2028 under seven priority areas: Tomorrow's Gwynedd, A Prosperous Gwynedd, A Homely Gwynedd, A Caring Gwynedd, A Welsh Gwynedd, A Green Gwynedd and An Efficient Gwynedd. The priority areas are our Well-being Objectives under the Future Generations (Wales) Act 2015. The objectives will directly contribute to achieving the seven national well-being goals. A copy of the current Plan can be found at **Appendix 1**.
- 3.4 The purpose of reviewing the Plan is to look at where we have reached after a year of implementation, as well as to make sure we continue to do the right things. We considered what has changed from last year, looking at priority areas, ambitions and the projects in the current Plan and considered if there are any that should be added, modified or any that should be removed.

4 Relevant Considerations

4.1 The issues that Cabinet members need to consider before approving the modifications to the Plan are set out below. Details regarding these modifications have been highlighted in **Appendix 2**.

4.1.1 The following projects have been added:

Priority Area: Tomorrow's Gwynedd

- **Formulating and executing on a 10-year strategic direction for education in Gwynedd**
- **Review and improve the range of inclusion provisions in Gwynedd.**

Priority Area: A Welsh Gwynedd

- **Reviewing Gwynedd's Education Language Policy together with undertaking an evaluation of the Immersion System to ensure that all education policies and services provided to children and young people in Gwynedd set a firm foundation for the Welsh language**

4.1.2 The scope or content of the following project has changed:

Priority Area: Tomorrow's Gwynedd

- **Modernise buildings and the learning environment** - modifications to the project overview.

4.1.3 The following project has transferred to being part of the day-to-day work of the relevant Department during 2023/24:

Priority Area: Tomorrow's Gwynedd

- **Free School Meals**

4.1.4 In addition, following a desire to simplify the description and focus on transformational issues, projects in the Adults field within the **A Caring Gwynedd Priority Area** have been repackaged under 5 new projects, namely:

- **Modernising our care resources to meet future needs.**
- **Using more of technology to improve the ability of Gwynedd residents to access support and care.**
- **Working with Health Services to enable people to live their best life in the community.**
- **Developing training and work opportunities for individuals who need support.**
- **Llechen Lân**
They replace the following projects that were in the original version of the Plan:
- **Local Preventative Support**
- **Living independently**
- **Quality Specialist Care.**

4.1.5 It should be noted that work is ongoing to identify project milestones for 2024-25 and outline milestones for the remainder of the Plan period. There will be an opportunity to discuss those relevant to your area of responsibility at meetings to be held in March.

4.1.6 It is suggested that the remaining projects under the seven priority areas continue from 2023/24.

3.2 Resources

3.2.1 Additional resources are required in order to achieve the commitments noted for a number of projects within the Plan. Without the resource, it may not be possible for us to deliver what is noted. Currently, we propose that all the projects are approved as part of the Plan, subject to the Cabinet's agreement to fund them, after they have considered each business case individually.

3.3 The Well-being of Future Generations (Wales) Act 2015

3.3.1 The Act places a duty on public bodies in Wales to improve economic, social, environmental and cultural well-being. As part of the duty, public bodies are required to publish well-being objectives that outline how they will improve well-being. Our seven priority areas are our Well-being Objectives under the Future Generations (Wales) Act 2015. The objectives will directly contribute to achieving the seven national well-being goals. Our Well-being Statement for 2023-28 remains current.

3.4 Public Consultation

3.4.1 There has been no public consultation on the review of the scheme as we consulted extensively on the content of the Council Plan 2023-28. As part of that process, several pieces of work / information were considered, including the projects that were in the previous Plan 2018-23, feedback from the 'Ardal Ni' Regeneration Framework engagement work, and the Well-being Assessments from Gwynedd and Anglesey Public Services Board.

3.4.2 As part of the formulation of the Plan, two workshop-style sessions were held during December 2022 to which all Elected Members were invited. They were given the opportunity to highlight any matters that needed addressing on a county level along with the areas they represent. A public consultation was also held during December 2022. Overall, there was agreement to the draft priorities along with a welcome for the opportunity to feed into the process before the Plan was formally presented to Cabinet and the Full Council meeting in 2023.

3.5 Equality Act 2010

3.5.1 There is a statutory requirement to prepare and consider the findings of an equality impact assessment in preparing the plan in accordance with the requirements of the Equality Act 2010 as implemented in Wales. The assessment is attached in **Appendix 3**.

3.5.2 The assessment on the Plan in its entirety does not identify any impact that would justify a departure from the recommendation, and there are elements for which a positive impact is anticipated. The Project Leaders will be responsible for undertaking a full Equality Impact Assessment on individual projects.

4 Next Steps and Timetable

4.1 With approval of the modifications to the Plan, the revised Plan is scheduled to be submitted for adoption at the next full Council meeting on 7 March 2024.

5 Views of the Statutory Officers

i. Chief Finance Officer

As noted when the Plan was adopted in March 2023, there is an acknowledgment that resource requirements for all the improvement priorities in the Plan is greater than the money available to them, and I therefore agree with what is set out in paragraph 3.2 of the report, that there is a need to consider each individual business case before funding is agreed. The specific funds that are available to support the Plan are under constant review.

Financial propriety means that we will continue to ensure that a funding source has been identified for any commitment to spend.

ii. Monitoring Officer

It is appropriate that the Council keeps the Plan under regular review. I am satisfied with the propriety of the recommendation.

List of Appendices:

Appendix 1: Cyngor Gwynedd Plan 2023-2028

Appendix 2 : Modifications to Cyngor Gwynedd Plan 2023-28 – 2024/25 Review

Appendix 3 : Equality Impact Assessment 2024/25 Review

The Cyngor Gwynedd Plan 2023-28





“Gwynedd is a unique county. Here we have naturally Welsh-speaking and vibrant communities, and our commitment to be at the forefront of promoting the use of the Welsh language everywhere and on every occasion continues to be a main priority.”

Foreword by Council Leader

It is my honour to present the Cyngor Gwynedd Plan 2023-2028, which sets out our aspirations and priorities for the next five years. This is not a worthless document to put to one side and forget about - rather, it is a manual that shows clearly how we will realise our promise to our residents over the next period.

Without a doubt, this is an ambitious Plan within an incredibly challenging climate. We are being squeezed from many directions with some of the repercussions of Covid-19 and Brexit persisting, as well as the increase in living and energy costs that affect our residents from day-to-day. Inflation and unwise decisions by Ministers in Westminster mean that Local Authorities are facing severe cuts over the next few years – and all this while the demand for our services and support is increasing.

We are fighting against the tide, and this would not be possible without our committed workforce that continues to offer a service to the people of Gwynedd 24 hours a day, 365 days a year. We sincerely thank each and every one of them.

We also know that it would be foolish to try and achieve

these ambitions on our own. In order to succeed we must work together and continue to foster a healthy relationship with a wide range of partners – the third sector, the private sector, other public services and of course our enthusiastic communities.

Gwynedd is a unique county. Here we have naturally Welsh-speaking and vibrant communities, and our commitment to be at the forefront of promoting the use of the Welsh language everywhere and on every occasion continues to be a main priority.

From the busy streets of the city of Bangor, to the ends of the Llŷn peninsula, and down to the countryside of south Meirionnydd, it is natural that the needs of these areas will not be the same, and the Plan builds on the conversations that took place with communities

during 2022. While many decisions are out of our hands and are made far away from Gwynedd by the Welsh and UK Governments, we have made sure that we direct the few resources we have to the fields where they are needed most.

In my opinion, there has never been a greater need for a strong local government. Our new corporate plan shows how we as a Council can work together across Gwynedd to provide the required services so that every one of our residents can live good and safe lives.



**Councillor
Dyfrig Siencyn**
Cyngor
Gwynedd
Leader

Introduction

This plan outlines our vision and priorities for the next five years.

Following extensive consultation with the people of Gwynedd as part of the 'Our Area' work, together with a number of discussions and feedback from the county's residents and beyond, a series of priorities and projects have been formed that will allow us to further develop and improve the services provided to the people of Gwynedd.

Naturally, only a proportion of the Council's activities are seen here, and the day-to-day work of providing services continues throughout the county.

As everyone now knows, it is a difficult time financially, and there is no doubt that it will be a challenge for the Council to deliver all the projects on time. However, we will be aiming high over the next five years and will work hard to achieve every ambition that has been set for the priorities in the plan.

In order to do that we will continuously review the plan and set milestones for each project in order to allow us to measure our progress annually.

The Priority Fields within this document are our Well-being Objectives under the Well-being of Future Generations (Wales) Act 2015. The Objectives will directly contribute to delivering the seven national well-being goals.

In implementing the plan, we will also give due consideration to the five ways of working within the Act by considering the long-term, prevention, integrated working, collaborative working and involving people of all ages. We will do this by adopting a way of working which focuses on putting the people of Gwynedd at the heart of everything we do.

The plan includes a series of projects for the next five years under seven priority fields:

TOMORROW'S GWYNEDD

Giving our children and young people the best possible start in life

A PROSPEROUS GWYNEDD

Strengthening the economy and supporting the people of Gwynedd to earn a decent salary

A HOMELY GWYNEDD

Supporting the people of Gwynedd to live in suitable and affordable homes in their communities

A CARING GWYNEDD

Supporting the residents of Gwynedd to live full and safe lives in our communities

A WELSH GWYNEDD

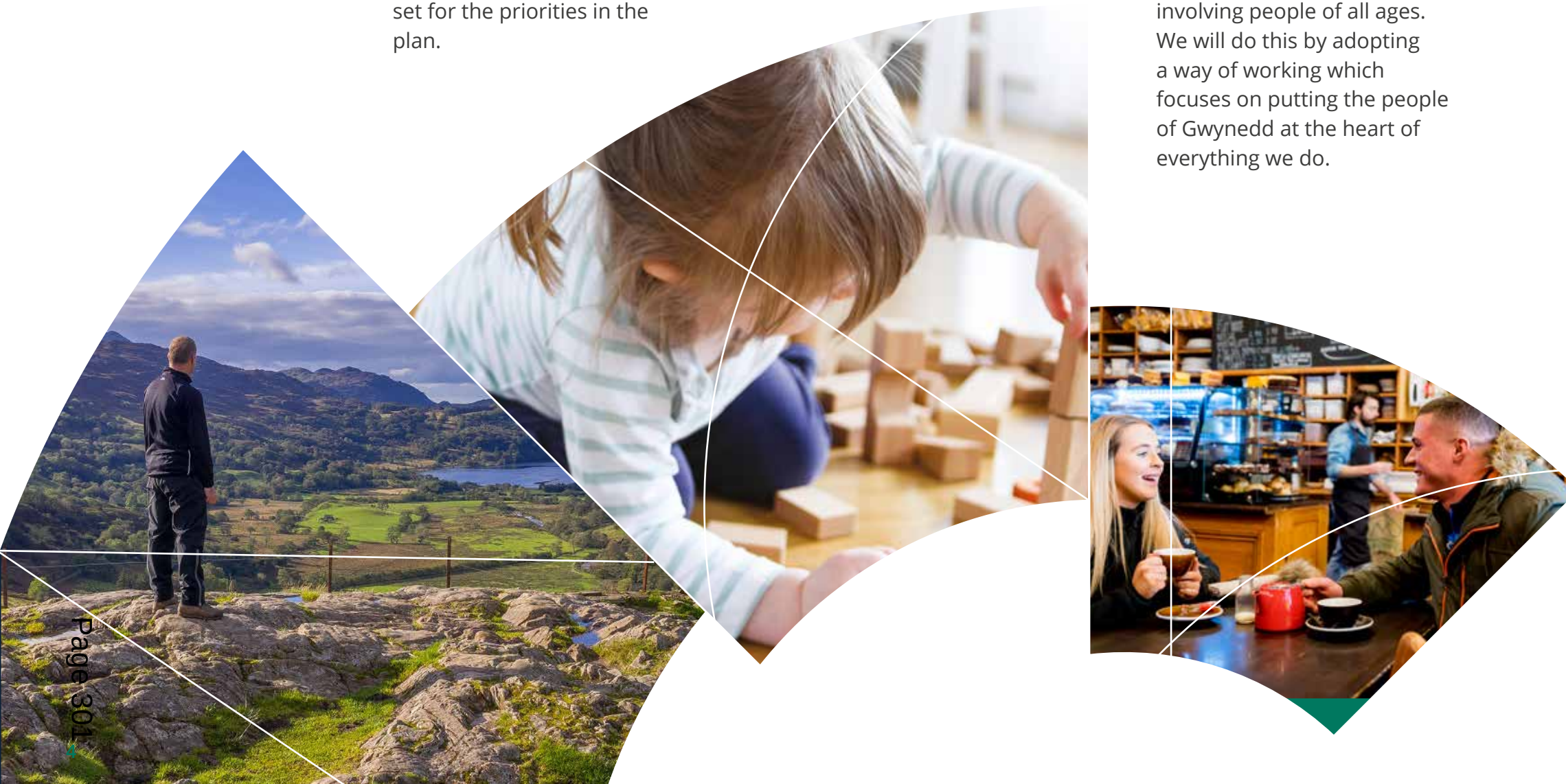
Ensuring that we give our residents every possible opportunity to use the Welsh language in the community

A GREEN GWYNEDD

Protecting the county's natural beauty, and responding positively to the climate change crisis

AN EFFICIENT GWYNEDD

Putting the residents of Gwynedd first and treating them fairly and ensuring that the Council performs effectively and efficiently



Priority Field

Tomorrow's Gwynedd

Giving our children and young people the best possible start in life

Our ambition is to ensure that every child educated in Gwynedd gets:

- Treated equally, encouraged to treat others equally and that we give priority to their happiness and well-being.
- Education of the best possible standard including access to a broad range of academic and vocational subjects to fulfil the requirements of the new 'Curriculum for Wales'.
- Access to Welsh-medium education throughout their time in education.
- Educated in buildings that are in a good state of repair, and to the best of our ability are safe and fit for purpose.
- The opportunity to develop into rounded citizens, who are content and confident in the world.
- Tailored support from professional services to meet their additional learning needs.
- The opportunity to have a nutritious meal in school, free of charge to as many pupils as possible.
- Access to equipment and technology that promote modern and effective learning.
- An assurance of suitable facilities and playing fields that are available for children and young people in their leisure time.



During the next 5 years we will prioritise:

Transforming education for children in their early years

Free School meals

Modernising buildings and the learning environment

Promoting the well-being of children and young people and reducing the cost of sending children to school

Extending opportunities for play and socialising for the county's children and young people

Tomorrow's Gwynedd – Projects

Transforming education for children in their early years

The early years are key to the social development of children, and the importance of this phase was particularly seen during the pandemic. We will transform this service and we will be collaborating with the health service and Mudiad Meithrin in order to ensure that all of the county's children have the best possible start to their time in education.

Free School meals

All the county's primary schoolchildren will get free school meals, and we will also consider if it is possible to extend this to secondary pupils. Consequently, we will need to upgrade our kitchens and dining areas to cope with the higher numbers who will be having school dinners.

Modernising buildings and the learning environment

Despite significant investment over the last decade, several of the county's school buildings are old and need modernisation. We will continue to make improvements to schools across the county, specifically in the Bangor and Cricieth areas, and we will take every opportunity to apply for grant assistance to enable us to modernise existing buildings and develop new buildings.

We will also complete our review of post-16 education arrangements in Arfon to ensure that they offer the best arrangements for the area's learners.

Promoting the well-being of children and young people and reducing the cost of sending children to school

With the increasing costs of daily items such as school uniform, food, transport and stationery, we will revisit the costs associated with sending children to school, with the intention of reducing these costs, whilst protecting the education and valuable experiences that our children have during and after school hours.

We will also deal with broader well-being matters, including emotional and psychological challenges, which affect children and young people, for example gaining confidence, equality, mental health, transport issues, and securing work experience and job opportunities.

Extending opportunities for play and socialising for the county's children and young people

Opportunities for play are important to a child's development and providing quality playing fields is one way to promote these. We will therefore revisit all our playing fields and develop a plan that will consider how we can improve and maintain them.

We will also look at how the new provision for our Youth is working across the county and what outcomes this delivers for young people.



A Prosperous Gwynedd

Strengthening the economy and supporting the people of Gwynedd to earn a decent salary

The foundation for enabling the people of Gwynedd to prosper is ensuring that there are suitable jobs available in the county paying salaries that enable them to support themselves and their families.

Our ambition is to secure:

- High-quality jobs
- Support for local businesses to thrive
- Sustainable tourism for the benefit of communities
- Strong and resilient communities
- Prosperous and vibrant town centres

During the next 5 years we will prioritise:

Promoting our culture and a sustainable visitor economy

Regenerating communities and town centres

Creating the best possible circumstances in Gwynedd for businesses and community enterprises to thrive, and support the people of Gwynedd into work

Keeping the Benefit Local



23,872.00	345.00	23,872.00
34,557.00	42,456.00	634,567.00
7,566.00	5,345.00	16,164.00
38,484.00	16,164.00	10,776.00
16,164.00	3,423.00	34,423.00
33,245.00	2,342.00	54,322.00
54,322.00	3,423.00	23,312.00
23,312.00	234,423.00	9,220.00
9,220.00	31,428.00	14,772.00
31,428.00	14,772.00	16,392.00
14,772.00	15,168.00	15,168.00
16,392.00	58,680.00	58,680.00
15,168.00	13,704.00	13,704.00
58,680.00	15,924.00	15,924.00
13,704.00	51,000.00	51,000.00
15,924.00	46,884.00	46,884.00
51,000.00	37,872.00	37,872.00
46,884.00	550,009.00	3,955,000.00
37,872.00		2,580,255.00
550,009.00		

A Prosperous Gwynedd – Projects

Promoting our culture and a sustainable visitor economy

We will take a series of measures to promote our culture and create a sustainable visitor economy:

- The Gwynedd and Eryri Sustainable Visitor Economy Plan, formed jointly with the Eryri National Park Authority, will be launched in Spring 2023. The principal partners and stakeholders will collaborate to deliver what will be in the Plan by establishing a Gwynedd and Eryri Sustainable Visitor Economy Partnership.
- We will ensure prosperity from The Slate Landscape of Northwest Wales World Heritage Site designation and secure resources to fulfil the World Heritage Site Action Plan.
- We will control motorhomes visiting Gwynedd by piloting the development of up to six designated sites for motorhomes to stay overnight.
- Hosting the 2023 National Eisteddfod in Gwynedd will be a platform to celebrate our culture and language, arts and sports and ensure that the Eisteddfod leaves a positive legacy for Gwynedd communities.

Regenerating communities and town centres

We will establish a Regeneration Framework by developing Local Regeneration Plans for 13 catchment areas across the county. We will ensure cross-departmental arrangements within the Council to ensure that work programmes intertwine and share information with communities by continuing with the engagement work. Town/City Centre action plans will be prepared for individual towns.

Creating the best possible circumstances in Gwynedd for businesses and community enterprises to thrive, and support the people of Gwynedd into work

We will support businesses and community enterprises in Gwynedd to thrive in many ways such as developing produce and accessing new markets, helping enterprises to save money by reducing waste and making better use of technology, supporting businesses in Gwynedd to trade together and prioritise helping enterprises that commit to paying a 'real living salary' to their employees. We will encourage businesses to make the most of the Welsh language, develop more business units to let, and will strive to ensure that the North Wales Growth Deal projects benefit the people of Gwynedd. In addition, we will help the people of Gwynedd to fulfil their potential and support those who are excluded from the labour market to return to employment and will work with employers to assist them to ensure they have sufficient employees.

Keeping the Benefit Local

The Council is responsible for purchasing a significant amount of goods and services from external companies and we are keen to see local businesses competing and winning these contracts to ensure that as much of the Council's expenditure as possible remains local.

This project will ensure that we make every effort to support local businesses to apply for opportunities, within the relevant rules, whilst ensuring at the same time that the Council receives the best value for the money that is spent.

A Homely Gwynedd

Supporting the people of Gwynedd to live in suitable and affordable homes in their communities



Our ambition is to ensure that the people of Gwynedd can access a suitable home of a high standard, that is affordable and improves their quality of life.

We will try to achieve this by setting an ambition to:

- Ensure that no-one is homeless in Gwynedd
- Help the residents of Gwynedd to own an affordable home in their community
- Ensure that houses in Gwynedd are environmentally friendly
- Ensure that houses in Gwynedd have a positive influence on the health and well-being of the county's residents



During the next 5 years we will prioritise:

Increasing the supply of housing for local people

Dealing with the energy cost crisis and fuel poverty

Ensuring that no one is homeless in Gwynedd

Managing second homes and short-term holiday accommodation

A Homely Gwynedd – Projects

Dealing with the energy cost crisis and fuel poverty

Increasing energy costs means that a number of people in the county cannot afford to keep their houses warm, and consequently there is a genuine risk to the health of some of our residents.

We will collaborate with our partners to promote and facilitate energy saving schemes, and benefits to ensure that as many people as possible take advantage of the support available at such a challenging time.

Ensuring that no one is homeless in Gwynedd

In order to ensure that homeless people do not have to spend a long time in temporary accommodation, we will:

- Develop our own 'supported housing' units, namely accommodation where support is provided for homeless individuals by specialist staff to allow them to learn and develop life skills to improve their ability to maintain a future tenancy.
- Refurbish and upgrade the former NatWest and GISDA building in Caernarfon to provide five flats for homeless youths and extend the current café to create employment for the homeless, as well as create a permanent home for GISDA and create a multi-agency space to support homeless youths.
- Put a support package together to encourage private landlords to offer permanent accommodation for the homeless, instead of letting their accommodation for short-term periods or as holiday accommodation. We will aim to have 100 permanent accommodation units over the Plan's lifespan.
- Work to prevent homelessness by increasing our capacity to assist and support vulnerable individuals to remain in their homes.
- Attempt to move homeless people to fixed accommodation as soon as possible, rather than them having to stay in temporary accommodation for long periods.

Increasing the supply of housing for local people

We will fulfil the projects that are part of our Housing Action Plan to increase the opportunities for Gwynedd residents to be able to secure a suitable home. Amongst the 33 individual projects that are part of the Housing Action Plan, we will:

- Collaborate with local housing associations to build more social housing by accelerating the building programme aiming to construct 500 new houses.
- Build our own houses in sites across the county. They will be available to local residents at intermediate rent or to buy through shared equity schemes. We aim to build 100 houses of this type.
- Buy private houses in order to let them out at an affordable rent to local people. We will target empty houses initially, but we will also look at houses on the open market. We aim to buy 100 affordable houses over the Plan's lifespan.
- Provide assistance in the form of shared equity schemes so that first time local buyers can compete in the housing market.
- Provide grants to assist first-time buyers to renovate empty houses to an acceptable living standard. This will bring empty houses back into use and will assist young people and first-time buyers to live in a house. We aim to bring 250 empty houses back into use.
- Purchase building land for the future.

Managing second homes and short-term holiday accommodation

The substantial number of houses in Gwynedd that are being used as second homes and short-term holiday accommodation is having a detrimental impact on the ability of the people of Gwynedd to have access to homes in their communities.

The Council has presented detailed research to the Government which highlights the need to act in the areas of planning, taxation and licensing in order to gain better control of the situation. Following recent announcements from the Government, including the establishment of the Dwyfor Pilot, which commits to introduce steps to tackle problems in the field, the Council is preparing to implement legislative changes as soon as possible. We will also set a Council tax premium for second homes and empty homes every year at an appropriate rate to respond to the situation at the time.

Priority Field

A Caring Gwynedd

Supporting the residents of Gwynedd to live full and safe lives in our communities



Looking after vulnerable individuals is one of our main responsibilities, and our ambition is to support the residents of Gwynedd to live full and safe lives in our communities by:

- Safeguarding children, young people and vulnerable adults.
- Supporting residents to participate and engage with their communities, and to reduce poverty and its effects.
- Ensuring that children, young people and their families live happy lives and reach their potential in terms of their education, health and well-being.
- Ensuring there is information available for the residents of Gwynedd to assist them in making informed decisions about their health and physical and mental well-being.
- Enabling the residents of Gwynedd to live independently in suitable accommodation with dignity for as long as possible in their community.
- Supporting unpaid carers.
- Providing high-quality care and support in the right place at the right time.
- Supporting our communities to ensure accessibility and to develop into an Age-Friendly Gwynedd.

During the next 5 years we will prioritise:

Local
Preventative
Support

Living
independently

Specialist Quality
Care

Supporting
People's Well-
being

Autism Plan

Developing
residential
provision for
children who
are looked after
in small group
homes

Local Preventative Support

We will work in a preventative way to support and safeguard individuals locally by promoting their well-being and encouraging them to participate in their communities.

Amongst our plans are:

- Contributing to health and care developments in Bangor and Penygroes.
- Extending our network of community hubs for individuals with learning disabilities, focusing initially on Canolfan Dolfleurig, Dolgellau.
- Publishing a programme of events and opportunities for individuals and carers across the county.
- Ensuring that Gwynedd is an age-friendly county and that residents of all ages can have a good life in their local community.
- Sharing information more effectively with our communities and improving our engagement methods when developing services.

Living independently

The care needs of the county's individuals are changing, and people are living longer. Therefore, we need to adapt our services to enable people to live independently within their communities. Amongst our plans are:

- Extending our day care and respite provision and provide more options of suitable accommodation for individuals with a wide range of needs, such as Extra Care Housing.
- Collaboration across sectors to ensure that our domiciliary care services are tailored and are promptly available when needed.
- Leading on a Carers Plan across the Adults and Children care field to support the invaluable work of unpaid carers across the county.
- Ensuring that we use telecare and technology to their full potential to promote people's independence.
- Facilitate the process of receiving and providing care through direct payments by considering methods such as the Virtual Wallet.

Specialist Quality Care

We will ensure that appropriate and specialist care is available in a timely way; and across all our care provisions.

Amongst our plans are:

- Ensuring a sufficient nursing and dementia provision across the county including developing nursing beds at the Penrhos site, Pwllheli.
- Ensuring that we work jointly with the Health Board to enable us to deliver what is important for Gwynedd adults.
- Developing our mental health services to ensure sufficient emphasis on the well-being of individuals.
- Strengthening our ability to support care providers to maintain a quality service to Gwynedd residents.
- Contributing to the Workforce Planning project to ensure that appropriate attention is given to the specific challenges and opportunities in the care field.
- Implementing new Liberty Protection Safeguards arrangements to protect the rights of people receiving care in the county.

A Caring Gwynedd – Projects

Supporting People's Well-being

Some residents find it difficult to cope with life's challenges and the situation of a number of residents has been exacerbated as a result of the cost of living crisis. These residents need support to cope, to thrive, to be safe and to keep healthy.

We have a broad network throughout our communities which helps and supports residents to cope and to respond to their various needs. This network needs support to sustain that voluntary effort, and we will work to strengthen this essential task over the coming years.

Autism Plan

Children, young people and adults with autism find it difficult to obtain the specialist support required. Therefore, we will improve our provision and make it easier for individuals and their families to transfer between different services.

Developing residential provision for children who are looked after in small group homes

We wish to improve the experiences of children with profound and complex needs in the Council's care, who currently have to leave the county or Wales in order to get suitable provision. We will develop registered residential homes for small groups of up to two children, which will allow them to receive care in Gwynedd, attend local schools, and fully participate in the lives of their communities.

Priority Field

A Welsh Gwynedd

Ensuring that we give our residents every possible opportunity to use the Welsh language in the community.

As a national leader we will promote the growth of the Welsh language in all parts of the county. Our ambition is to:

- Ensure that every child in Gwynedd can use Welsh confidently in school and in their social life.
- Promote the growth of the Welsh language in all parts of the county and ensuring there are sufficient opportunities for everyone to be able to use the Welsh language naturally in their communities.
- Ensure access to facilities and information of a good quality in relation to leisure, culture and the arts.
- Work jointly with our partners to facilitate the ability for Gwynedd residents to have access to all public services through the medium of Welsh.
- Ensure that promoting the Welsh language is a key part of all the Council's work, and any plans that impact the people of Gwynedd.
- Support efforts to create new Welsh-speakers of all ages.

During the next 5 years we will prioritise:

Modernising and extending the immersion provision to teach Welsh to children

Promoting the use of the Welsh Language by the residents of Gwynedd

A Welsh Gwynedd – Projects

Modernising and extending the immersion provision to teach Welsh to children

It is essential that learners who are latecomers get opportunities to learn Welsh as soon as possible, through a first-rate modern provision, that is spread across Wales. It is essential that learners who are less confident in their Welsh language also have an opportunity to gain confidence and to improve their Welsh with the support of the Immersion Education System. We also wish to see our language immersion methods to support the Welsh language expanded in schools that serve communities where opportunities to use Welsh in the home and outside school are limited. This project in cooperation with the Immersion System and our schools will give all our learners the best opportunity to become confident Welsh-speakers who can use the language in all aspects of life.

Promoting the use of the Welsh Language by the residents of Gwynedd

We will conduct specific projects that will promote the use of Welsh and increase the opportunities to use the Welsh language in the community. This will include increasing the use of the Welsh language when dealing with public and community services.



A Green Gwynedd

Protecting the county’s natural beauty, and responding positively to the climate change crisis

Cyngor Gwynedd has declared a climate emergency, and our aim is to be a net zero carbon Council and ecologically positive by 2030.

Our ambition is to ensure:

- Significant reduction in carbon emissions.
- We respond to the effects of climate change.
- An increase in biodiversity and nature habitats.
- An excellent network of routes for residents to have the choice of active travel to their place of work, education or leisure.
- A public transport network that meets the needs of Gwynedd’s communities.

During the next 5 years we will prioritise:

Acting on flood risks	Waste and Recycling	Climate and Nature Emergency Plan	Active Travel
	Public Transport	New Local Development Plan	Clean and Tidy Communities

Acting on flood risks

The risks of coastal flooding and erosion are increasing with the impact of climate change which means that sea levels are rising and more intense storms occur more often. Gwynedd has the largest coastline in Wales and due to the nature of our landscape a high percentage of our communities, and the infrastructure that serves them, is on the coast.

We will collaborate with other agencies, in order to prioritise our coast based on risk, and form an action plan to get to grips with the risks where this is possible.

There is also a risk of inland flooding when water accumulates and rivers overflow. We will draw up catchment area plans in order to help avoid/respond to existing and increasing future threats.

A Green Gwynedd – Projects

Waste and Recycling

We will prepare a new waste and recycling strategy to try and increase the county's recycling level to meet the national target of 70% by 2025. This will assess how effective the current litter collection arrangements are in terms of promoting recycling (from door-to-door and in our centres) and introduce new arrangements where required.

Climate and Nature Emergency Plan

The Council's Climate and Nature Emergency Plan sets an ambition that "Cyngor Gwynedd will be net-zero carbon and ecologically positive by 2030."

The Plan includes a wide range of projects to reduce carbon emissions from the use of our fleet and travel, use of buildings, procurement, street lighting and several other fields. We will commence with further investment of £3m in renewable energy schemes and we will also draft specific measures to get to grips with the side-effects of climate change on Gwynedd communities.

Active Travel

Active travel aims to ensure that walking and cycling becomes the normal choice for daily journeys, to improve our personal health, air quality and to make places more pleasant to live and work.

We will improve the county's existing walking and cycle paths, and introduce new active travel routes to facilitate more walking and cycling in our communities.

Public Transport

We will review our existing public transport provision with the aim of developing a public transport network that will be convenient, reliable and reasonably priced to allow the residents of Gwynedd to travel every day of the week.

As a part of this plan, we will also introduce new electric buses.

New Local Development Plan

We will draw-up a new Local Development Plan for Gwynedd that will address housing needs, employment and the social and environmental needs of the county's residents over the next 15 years.

Clean and Tidy Communities

Recent engagement work has highlighted that clean and tidy communities are essential to promote pride in the area. In response, we will facilitate physical improvements to the built environment within and in the vicinity of Gwynedd's towns and villages, by focusing on open public spaces. We will also promote local ownership and foster pride in the area by working at a community level to forge relationships with local groups/organisations, volunteers and the third sector.



An Efficient Gwynedd



Putting the residents of Gwynedd first and treating them fairly and ensuring that the Council performs effectively and efficiently

During the next 5 years we will prioritise:

Workforce Planning

Developing the Council's Culture

Ensuring fairness for all

Women in Leadership

Managing the impact of national budgetary cuts

Digital Scheme

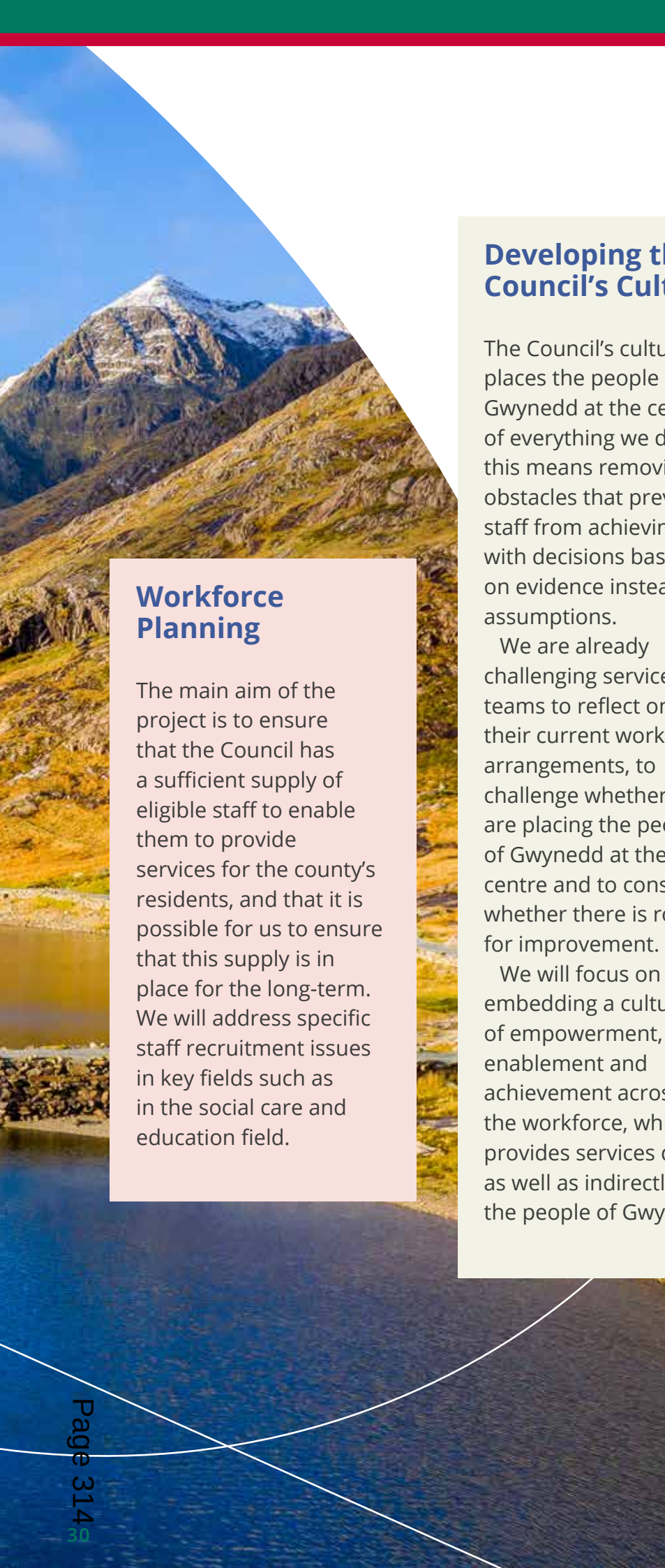
Strategic review of Health and Safety management

Adopting a Property Assets Management Plan to ensure that our estate is fit for purpose for future working

In order to ensure that the residents of Gwynedd receive the best possible services, we have a responsibility to ensure that our internal operational arrangements are always of the highest standard.

Our ambition is:

- To promote a culture of open and inclusive working which always puts the needs of the people of Gwynedd at the centre of everything we do.
- To provide adequate and suitable staffing resources for delivering services.
- To be an organisation that looks after our workforce's well-being and embeds the principles of equality naturally in all parts of the organisation.
- To make the best use of all financial resources.



An Efficient Gwynedd – Projects

Workforce Planning

The main aim of the project is to ensure that the Council has a sufficient supply of eligible staff to enable them to provide services for the county's residents, and that it is possible for us to ensure that this supply is in place for the long-term. We will address specific staff recruitment issues in key fields such as in the social care and education field.

Developing the Council's Culture

The Council's culture places the people of Gwynedd at the centre of everything we do and this means removing obstacles that prevent staff from achieving, with decisions based on evidence instead of assumptions.

We are already challenging service teams to reflect on their current working arrangements, to challenge whether they are placing the people of Gwynedd at the centre and to consider whether there is room for improvement.

We will focus on embedding a culture of empowerment, enablement and achievement across all the workforce, which provides services directly as well as indirectly to the people of Gwynedd.

Ensuring fairness for all

We will continue with the work that is already in the pipeline to ensure that the Council, in all of its actions, gives due attention to equality. We will identify the work that needs to be done to ensure that the Council treats everyone fairly, regardless of their equality characteristics, background and needs.

Women in Leadership

The number of women who undertake a management role within the Council is not commensurate with the distribution within the whole workforce. We will therefore continue to introduce a programme to develop potential for women, carrying out an audit of our recruitment and appointment methods for managerial posts and creating a forum for female leaders and prospective leaders as part of the programme to encourage more women to apply for senior posts within the Council.

Managing the impact of national budgetary cuts

The Council has already cut its budgets to save over £32m since 2015/16, however, as a result of the current economic situation, the funding the Council receives from the Government is not sufficient to cope with inflation and the new expenditure pressure. We are facing a financial gap of over £12 million over the next two years.

We will strive to do everything we can to reduce the impact on the services provided to the people of Gwynedd whilst accepting that it will not be possible to set a balanced budget without a long series of savings/cuts and increasing Council Tax higher than we would have wished.

Digital Scheme

People's expectations and trends have changed substantially as a result of the pandemic, and this is an opportunity to see whether we can further improve the experience of Gwynedd residents of front-line and back-office services by using digital technology.

Strategic review of Health and Safety management

This project looks at the strategic management of health and safety within the Council and the way this ties in with the Council's general governance and performance systems. It entails undertaking a fully comprehensive review of the management system as a whole.

Adopting a Property Assets Management Plan to ensure that our estate is fit for purpose for future working

We will adopt a new Property Assets Management Plan that will outline the Council's plan in terms of using our buildings to provide services. The previous Property Assets Management Plan was adopted in 2016, and a substantial change has occurred in working arrangements and service delivery since then. It is timely for us to look at managing and rationalising the estate in line with the Council's priorities and the needs of services provided for Gwynedd residents. Alongside with this we will confirm our flexible working and hybrid working arrangements.

Contribution to the five Ways of Working in the Well-being of Future Generations (Wales) Act 2015

	Long term	Prevention	Integration	Collaboration	Involvement
TOMORROW'S GWYNEDD - Giving our children and young people the best possible start in life					
Transforming education for children in their early years	✓	✓	✓	✓	✓
Free School meals	✓	✓	✓		
Modernising buildings and the learning environment	✓	✓	✓	✓	✓
Promoting the well-being of children and young people and reducing the cost of sending children to school	✓	✓	✓	✓	✓
Extending opportunities for play and socialising for the county's children and young people	✓	✓	✓	✓	✓
A PROSPEROUS GWYNEDD - Strengthening the economy and supporting the people of Gwynedd to earn a decent salary					
Promoting our culture and a sustainable visitor economy	✓	✓	✓	✓	✓
Regenerating communities and town centres	✓	✓	✓	✓	✓
Creating the best possible circumstances in Gwynedd for businesses and community enterprises to thrive, and support the people of Gwynedd into work	✓	✓	✓	✓	✓
Keeping the Benefit Local	✓	✓	✓	✓	✓
A HOMELY GWYNEDD - Supporting the people of Gwynedd to live in suitable and affordable homes in their communities					
Increasing the supply of housing for local people	✓	✓	✓	✓	
Dealing with the energy cost crisis and fuel poverty	✓	✓		✓	
Ensuring that no one is homeless in Gwynedd	✓	✓		✓	
Managing second homes and short-term holiday accommodation	✓	✓	✓	✓	✓
A CARING GWYNEDD - Supporting the residents of Gwynedd to live full and safe lives in our communities					
Local Preventative Support	✓	✓	✓	✓	✓
Living independently	✓	✓	✓	✓	✓
Specialist Quality Care	✓	✓	✓	✓	✓
Supporting People's Well-being		✓	✓	✓	✓
Autism Plan	✓	✓		✓	✓
Developing residential provision for children who are looked after in small group homes	✓	✓	✓	✓	✓

	Long term	Prevention	Integration	Collaboration	Involvement
A WELSH GWYNEDD - Ensuring that we give our residents every possible opportunity to use the Welsh language in the community					
Modernising and extending the immersion provision to teach Welsh to children	✓	✓			
Promoting the use of the Welsh Language by the residents of Gwynedd	✓	✓	✓	✓	✓
A GREEN GWYNEDD - Protecting the county's natural beauty, and responding positively to the climate change crisis					
Acting on flood risks	✓	✓	✓	✓	✓
Waste and Recycling	✓	✓	✓	✓	✓
Climate and Nature Emergency Plan	✓	✓	✓	✓	✓
Active Travel	✓	✓	✓	✓	✓
Public Transport	✓	✓	✓	✓	✓
New Local Development Plan	✓	✓	✓	✓	✓
Clean and Tidy Communities	✓	✓	✓	✓	✓
AN EFFICIENT GWYNEDD - Putting the residents of Gwynedd first and treating them fairly and ensuring that the Council performs effectively and efficiently					
Workforce Planning	✓	✓	✓	✓	✓
Developing the Council's Culture	✓	✓	✓	✓	✓
Ensuring fairness for all	✓	✓		✓	
Women in Leadership				✓	
Managing the impact of national budgetary cuts	✓	✓	✓	✓	✓
Digital Scheme	✓	✓	✓	✓	✓
Strategic review of Health and Safety management	✓	✓	✓	✓	✓
Adopting a Property Assets Management Plan to ensure that our estate is fit for purpose for future working	✓	✓	✓	✓	✓

If you would like to receive this document in a different language or format
please phone 01766 771000
or email equality@gwynedd.llyw.cymru

If you would like more information about this Plan
please contact the Council Business Support Team on 01766 771000
or councilplan@gwynedd.llyw.cymru

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www.gwynedd.llyw.cymru



Mae'r ddogfen yma ar gael yn Gymraeg a Saesneg
This document is available in English and Welsh

Proposed modifications to Cyngor Gwynedd Plan 2023-28 (2024/25 Review)

TOMORROW'S GWYNEDD - Giving our children and young people the best possible start in life

Key

Information with a line through the text to be taken out

Department	Project	Brief Description	Comments / Clarification	Page Number on current plan	New / Modified
Education	Modernise buildings and the learning environment	Despite significant investment over the past decade, many of the county's school buildings are still old and in need of modernisation. We will continue to make improvements to schools across the county, and specifically in the Bangor, Cricieth and Bontnewydd area, we will take every opportunity to apply for grant aid to enable us to modernise existing buildings and develop new buildings. ~~We will also conclude our review of post-16 education arrangements in Arfon to ensure they provide the best arrangements for learners in the area.~~	At the Cabinet meeting on 28 November 2023 it was decided not to proceed with the review of post-16 education arrangements in Arfon.	9	Modified
Education	Formulating and executing on a 10-year strategic direction for education in Gwynedd	Formulating a 10-year Education Strategy for Gwynedd engaging with key stakeholders on the priorities to ensure a resilient education system, together with world-class educational provision and experiences for children and young people in the county		n/a	New
Education	Review and improve the range of inclusion provisions in Gwynedd.	The range of inclusion provisions available to learners with emotional, behavioural and social needs must to be reviewed and improved. The needs of these learners have increased, with the impact of the pandemic seen clearly and long term.		n/a	New

Education	~~Free school dinners~~	All primary school children in the county will receive free school dinners, and we will consider if it is possible to extend this to secondary pupils as well. Consequently, we will need to upgrade our kitchens and dining areas to cope with the higher numbers who will be having school dinners.	All primary children have access to the offer of free school dinners since September 2023, a year ahead of the national timeframe. Transferred to the day-to-day work of the service in the context of promoting and encouraging as many families as possible to take advantage of the offer. No guidance from the Welsh Government has yet been forthcoming on extending the offer to secondary schools, and therefore the Department/Council currently have no resources available to consider the secondary	8	Modified – transfer to day to day work

A PROSPEROUS GWYNEDD - Strengthening the economy and supporting the people of Gwynedd to earn a decent salary

No changes.

A HOMELY GWYNEDD - Supporting the people of Gwynedd to live in suitable and affordable homes in their communities

No changes.

A CARING GWYNEDD - Supporting the residents of Gwynedd to live full and safe lives in our communities

Department	Project	Brief Description	Comments	Page Number	New / Modified
Adults	~~Local Preventative Support~~	We will work in a preventative way to support and safeguard individuals locally by promoting their well-being and encourage them to participate in their communities. Amongst our plans are:	Transformational elements in the Adults field have been repackaged within the 3 new projects suggested below.	20	Modified

		• Contributing to health and care developments in Bangor and Penygroes. • Expanding our network of community hubs for individuals with learning disabilities, initially focusing on Dolfeurig Centre, Dolgellau. • Announcing a programme of activities and opportunities for individuals and carers across the county. • Ensuring Gwynedd is an age friendly county and residents of all ages can have a good life in their local community. • Share knowledge with our communities more effectively and improve our engagement in developing our services.			
Adults	Living independently	The care needs of the county's individuals are changing, and people are living longer. Therefore we need to adapt our services to enable people to live independently within their communities. Amongst our plans are: • Expanding our care and respite provision and provide further suitable accommodation options for individuals with a wide range of needs, such as Extra Care Housing. • Working together across sectors to ensure our home care services are tailored and available on time when needed. • Leading on a Carers Scheme across Adults and Children care to support the invaluable work of unpaid carers across the county.	Transformational elements in the Adults field have been repackaged within the 3 new projects suggested below.	20	Modified

		- Ensuring that we use telecare and technology to its full potential to promote independence for individuals. - Promoting the process of receiving and providing care through direct payments by considering methods such as the Virtual Wallet .			
Adults	Quality Specialist Care	We will ensure that appropriate and specialist care is available in a timely manner; across all our care provisions. Amongst our plans are: - Securing a sufficient nursing and dementia provision across the county which includes developing nursing beds at the Penrhos site, Pwllheli - Ensuring that we work jointly with the Health Board to enable us to deliver what is important for Gwynedd adults. - Developing our mental health services to ensure sufficient emphasis on individuals' well-being. - Strengthening our ability to support care providers to maintain a quality service for the residents of Gwynedd. - Contributing to the Workforce Planning project to ensure appropriate attention to the specific challenges and opportunities within care. - Implementing new Liberty Protection Safeguards arrangements to protect the rights of persons receiving care in the county.	Transformational elements in the Adults field have been repackaged within the 3 new projects suggested below.	20	Modified

Adults	Modernising our care resources to meet future needs	We will modernise our care homes, update our community resources and expand the accommodation options available to Gwynedd residents. Amongst our plans are: • Extra Care Housing - Development of over 100 new units in Penyberth, Frondeg (Pwllheli), Canolfan Lleu (Penygroes) and Dolgellau. • Residential Homes: ○ Redevelopment of Plas Gwilym, Penygroes. ○ Upgrading Hafod Mawddach and Cefn Rodyn. ○ Opening a Dementia Unit at Bryn Blodau and Plas Hedd Homes. ○ Planning dementia developments at Plas Pengwaith ○ Opening of new nursing and dementia home at Penyberth with 50+ beds • Supported Housing in the Community – a minimum of 6 houses located throughout the county to offer suitable and safe care homes. • Commissioning work jointly with the Housing Department to understand the need for suitable care accommodation for the future.		n/a	New
Adults	Using more of technology to improve the ability of Gwynedd residents to access support and care.	We will enable the people of Gwynedd to live a good life as long as possible within their local communities. To achieve this, they need to have the required information to take advantage of community opportunities that would promote their well-being, as well as flexible methods of organising the support they need. Amongst our plans are:		n/a	New

		• Adopting and promoting a community information system, Dewis • Integrating a virtual occupational therapy system, AskSarah, into our website • Developing our use of Technology Enabled Care (TEC) • Promoting use of the Telecare service • Making use of robotics to enable independent living • Developing our Direct Payments system using a virtual wallet			
Adults	Working with Health Services to enable people to live their best life in the community	To ensure that we fully promote the well-being of individuals, it is vital that we are able to change our culture and ensure that we work effectively with the Health Board to deliver comprehensive care and health services into the future. Amongst our plans are: • Co-locating adults teams with community nurses and health therapists • Developing collaboration systems as one team around the individual through a Community Resource Team system • Working together to align the Community Resource Teams with the Primary Health Clusters • Developing new collaboration arrangements for the community mental health teams		n/a	New
Adults	Developing training and work opportunities for individuals who need support	We will promote training and work opportunities for individuals who need support. Amongst other schemes, we will improve provision at our Learning Disabilities Day Centres at Dolfeurig in Dolgellau and Frondeg, Caernarfon.		n/a	New

Adults	Llechen Lân	We will prepare an analysis of the demographics of Gwynedd; the demand for service; and adult social services best practices to understand and highlight the demand for service and associated resources that will be needed for the next twenty years.		n/a	New

A WELSH GWYNEDD - Ensuring that we give our residents every possible opportunity to use the Welsh language in the community

Department	Project	Brief Description	Comments	Page Number	New / Modified
Education	Reviewing Gwynedd's Education Language Policy together with undertaking an evaluation of the Immersion System to ensure that all education policies and services provided to children and young people in Gwynedd set a firm foundation for the Welsh language	Review Gwynedd's Education Language Policy along with undertaking an evaluation of the Immersion System to ensure that all education policies and services provided in Gwynedd set a firm foundation for the Welsh language, contribute to Welsh 2050, and reflect the most recent changes in the field by the Welsh Government.		n/a	New

A GREEN GWYNEDD - Protecting the county's natural beauty, and responding positively to the climate change crisis

No changes.

AN EFFICIENT GWYNEDD - Putting the people of Gwynedd first and treating them fairly and ensuring that the Council performs effectively and efficiently

No changes.

Assessing the Impact on Equality Characteristics, the Welsh language and Socio-economic Disadvantage

Please see the sheet *How to Make an Equality Impact Assessment* for assistance to complete this form. You are also welcome to contact Delyth Williams, Policy and Equality Officer on ext. 32708, or DelythGadlysWilliams@gwynedd.llyw.cymru, for further assistance.

The Council is required (under the Equality Act 2010) to consider the impact that changes to any policy or procedure (or the creation of a new policy or procedure) will have on people with protected equality characteristics. The Council also has additional general duties to ensure fairness and to foster good relationships. Therefore, a timely assessment must be made before any decision is taken on any relevant change (i.e. that affects people with protected equality characteristics).

The Council is also required, under the requirements of the Welsh Language Standards (Section 44 of the Welsh Language (Wales) Measure 2011), to consider the impact that any change in policy or procedure (or the creation of a new policy or procedure), will have on opportunities for people to use the Welsh language and to ensure that the Welsh language is not treated less favourably than English. This document therefore ensures that these decisions safeguard and promote the use made of the Welsh language.

From 1 April 2021, the Council has a duty to give due attention to addressing socio-economic disadvantage in strategic decisions.

I) Details

I.1 What is the name of the policy / service in question?

The Council Plan 2023-28, Revision 2024/25

I.2 What is the purpose of the policy / service being created or amended? What changes are being considered?

The purpose of the Council's Plan is to identify priorities and key areas to implement between 2023 and 2028. This is the second year of the Plan. The original version of the Plan was adopted by the Council at its meeting on 2 March 2023.

The new Plan states our vision for the next 5 years, and then every annual review will offer an update that summarises where we have reached on the journey, and what our priorities will be for the year to come. Here are the changes made to the 2024/25 Revision:

The following projects have been added:

Priority Area: Tomorrow's Gwynedd

- **Formulating and executing on a 10-year strategic direction for education in Gwynedd**
- **Review and improve the range of inclusion provisions in Gwynedd.**

Priority Area: A Welsh Gwynedd

- **Reviewing Gwynedd's Education Language Policy together with undertaking an evaluation of the Immersion System to ensure that all education policies and services provided to children and young people in Gwynedd set a firm foundation for the Welsh language**

The scope or content of the following project has changed:

Priority Area: Tomorrow's Gwynedd

- **Modernise buildings and the learning environment** - modifications to the project overview.

The following project has transferred to being part of the day-to-day work of the relevant Department during 2023/24:

Priority Area: Tomorrow's Gwynedd

- **Free School Meals**

In addition, following a desire to simplify the description and focus on transformational issues, projects in the Adults field within the **A Caring Gwynedd Priority Area** have been repackaged under 3 new projects, namely:

- **Modernising our care resources to meet future needs.**
- **Using more of technology to improve the ability of Gwynedd residents to access support and care.**
- **Working with Health Services to enable people to live their best life in the community.**
- **Developing training and work opportunities for individuals who need support.**
- **Llechen Lân**

They replace the following projects that were in the original version of the Plan:

- **Local Preventative Support**
- **Living independently**
- **Quality Specialist Care.**

This Equality Impact Assessment looks at the Plan in its entirety. Each individual project within the Plan is expected to have a separate Assessment, whether for the entire project and/or for specific sections of it. It is the duty of the person responsible for the individual projects to undertake the Assessment(s).

1.3 Who is responsible for this assessment?

Dewi Jones, The Council's Business Support Service Manager, Leadership Team

1.4 When did you commence the assessment? Which version is this?

January 2023 – version 1, full assessment of the Plan.
This is version 2 – January 2024 – 2024/25 Revision of the Plan

2) Action

2.1 Who are the stakeholders or partners whom we will have to work with to carry out this assessment?

Elected Members, service users, Gwynedd residents.

2.2 What steps have you taken to engage with people who have protected characteristics, regarding the Welsh language or with communities (either due to location or due to need), who are living with a socio-economic disadvantage?

A consultation was undertaken during December 2022 and January 2023 to introduce and explain the draft priorities to the public, partners and local organisations and raise awareness of the opportunity for them to participate in the exercise by completing a short on-line questionnaire at www.gwynedd.llyw.cymru/consultations Paper copies were also available in local libraries and Siopau Gwynedd.

We encouraged as many as possible of Gwynedd's residents to complete and return the questionnaire by using the Council's website, the local press, spreading the message through our partners, social media websites and elected members' e-newsletter and Council staff.

We contacted organisations that represent or work with people and/or children with equality characteristics to inform them of the engagement and to ask them to notify their users of the questionnaire.

2.3 What was the outcome of the engagement?

The consultation remained open from 8 December 2022 until 3 January 2023.

We received 643 responses to the questionnaire. On the whole, respondents agreed with the priority areas and the projects and there were no specific concerns relating to the equality

characteristics.

The following table shows the number of respondents per area – Arfon, Dwyfor and Meirionnydd.

Area	Number	Percentage
Arfon	282	43.9%
Dwyfor	137	21.3%
Meirionnydd	203	31.6%
Outside Gwynedd	9	1.4%
No response	12	1.9%
Total	643	100.0%

The respondents were asked to answer questions about their equality features (optional) and the information gathered was as follows:

Gender

	Number	Percentage
Man / Male	267	41.5
Woman / Female	313	48.7
I identify in a different way	1	0.2
I prefer not to say	47	7.3
No response	15	2.3
Total	643	100.0

Age

	Number	Percentage
15 years old or younger	4	0.6
16 - 24 years old	11	1.7
25 - 34 years old	59	9.2
35 - 44 years old	60	9.3
45 - 54 years old	119	18.5
55 - 64 years old	162	25.2
65 - 74 years old	128	19.9
75 - 84 years old	38	5.9
85 + years old	4	0.6
I prefer not to say	46	7.2
No response	12	1.9
Total	643	100.0

Do you understand, speak, read and/or write in Welsh?

	Number	Percentage
Speak Welsh	329	51.2
Can understand Welsh verbally	281	43.7
Read Welsh	279	43.4

Write in Welsh	243	37.8
I do not understand Welsh (none of the above)	107	16.6
I prefer not to say	66	10.3
Other	75	11.7
Multiple choice question		

Nationality or national identity

	Number	Percentage
Welsh	304	47.3
English	83	12.9
Scottish	5	0.8
Northern Irish	1	0.2
British	161	25.0
I prefer not to say	46	7.2
Other	30	4.7
No response	13	2.0
Total	643	100.0

Race

	Number	Percentage
White	556	86.5
Black / African / Caribbean	0	0.0
Asian	1	0.2
Gypsy / Irish traveller	2	0.3
Mixed / several ethnic groups	8	1.2
I prefer not to say	57	8.9
Other	7	1.1
No response	12	1.9
Total	643	100.0

What is your religion?

	Number	Percentage
No religion	238	37.0
Christian	286	44.5
Muslim	0	0.0
Buddhist	4	0.6
Hindu	0	0.0
Jewish	3	0.5
Sikh	0	0.0
I prefer not to say	71	11.0
Other	26	4.0

No response	15	2.3
Total	643	100.0

Which of the following describes you best?

	Number	Percentage
Heterosexual / Straight	506	78.7
Gay man	10	1.6
Gay woman/lesbian	8	1.2
Bisexual	10	1.6
I prefer not to say	79	12.3
Other	10	1.6
No response	20	3.1
Total	643	100.0

Has your gender identity changed from what you were assigned at birth?

	Number	Percentage
Yes	10	1.6
No	541	84.1
I prefer not to say	67	10.4
No response	25	3.9
Total	643	100.0

It was not possible to identify a trend in the responses for any of the equality characteristics.

Individual projects should use the information gathered and engage further with the residents of Gwynedd as required.

2.4 On the basis of what other evidence are you acting?

As part of the process of drawing up the Council Plan for 2023-28, in July 2022 the Heads of Department were asked to identify and consider potential priorities and schemes for the next five years. In order to do this, consideration was given to several pieces of work/information, including the projects that were in the current 2022-23 Plan, feedback from engagement on the 'Ardal Ni' Regeneration Framework, and the Well-being Assessments by the Gwynedd and Anglesey Public Services Board.

In addition, in October 2022 a workshop was held with the Cabinet Members to discuss potential schemes for the new Plan.

Two further workshop sessions were held with elected members in December 2022 in order to give local members the opportunity to express their views and to highlight any additional issues that needed addressing.

To ensure that we meet the needs of the people of Gwynedd, we decided to engage on the

2023-28 version of the Plan with the public during December 2022 – January 2023. This was an opportunity for residents, businesses, groups and organisations, elected members, and City, Town and Community Councils to have their say on the draft priorities.

2.5 Are there any gaps in the evidence that needs to be collected?

The Council's Departments are responsible for implementing the individual schemes within the Council Plan. The Council's performance-challenge processes, where the Cabinet Member and members of scrutiny committees challenge the progress and development of the work being carried out on the Plan, is continuous work throughout the year. The reports on these performance challenge meetings are published as part of the Cabinet's meeting papers.

If it is necessary to change the content or direction of any individual project then the Equality Impact Assessment will be revisited for that project.

The Council Plan 2023-28 together with the Equality Impact Assessment are submitted to the Cabinet and the Council for scrutiny and will be reviewed annually.

3) Identifying the Impact

3.1 The Council must duly address the impact that any changes will have on people with the following equality characteristics. What effect will the new policy/service or the proposed changes in the policy or service have on people with these characteristics? We must also consider the impact on socio-economic disadvantage and on the Welsh language.

Characteristics	What type of impact? *	In what way? What is the evidence?
Race (including nationality)	Positive	The Council's Strategic Equality Plan for 2024-28 will give particular regard to any matters arising from the Welsh Government's Anti-racist Wales Action Plan. The project titled "Ensuring Fairness for Everyone" within the Council Plan will act on every characteristic, including race.
Disability	Positive	Care is a priority area, therefore it is expected to have a positive impact. All other individual schemes are expected to look at the impact on disability when conducting a separate Equality Impact Assessment.

		9.8% (N=63) of the respondents to the public consultation noted that they have a disability. A higher percentage of the respondents who noted that they have a disability (95.2%, N=60) agreed with Priority Area 3 compared with the proportion of the total number who responded to the consultation (85.1%, N=547). The project titled "Ensuring Fairness for Everyone" will act on every characteristic, including disability.
Gender	Positive	There is one specific individual plan in this area namely "Women in Leadership" therefore a positive impact is expected here. Nevertheless, it is not possible to identify the impact of the Plan in its entirety without completing impact assessments on the other individual schemes. The project titled "Ensuring Fairness for Everyone" will act on every characteristic, including gender.
Age	Positive	Age is prioritised in a number of fields therefore we expect the Plan to have a positive impact on children, young people and older people. Each individual plan is expected to look at the impact on different ages when conducting a separate Equality Impact Assessment. 91.3% of the respondents to the public consultation agreed with Priority Area 1. The project titled "Ensuring Fairness for Everyone" will act on every characteristic, including age.
Sexual orientation	Positive	The project titled "Ensuring Fairness for Everyone" will act on every characteristic, including sexual orientation.
Religion or belief (or non-belief)	Positive	The project titled "Ensuring Fairness for Everyone" will act on every characteristic, including religion.
Gender reassignment	Positive	The project titled "Ensuring Fairness for Everyone" will act on every characteristic, including gender reassignment.
Pregnancy and maternity	Positive	The project titled "Ensuring Fairness for Everyone" will act on every characteristic, including pregnancy and maternity.
Marriage and civil	Positive	The project titled "Ensuring Fairness for Everyone" will act on every characteristic, including marriage and civil

partnership		partnership.
The Welsh language	Uncertain at present because of a lack of evidence	There is a specific priority within the Council Plan that involves promoting the use of the Welsh language, with two projects identified under that priority. There are a number of individual projects within the Council that contribute to the Council's strategic objective of promoting the use of the Welsh Language. As no individual assessments have been prepared/submitted for the individual projects, it is very difficult at this point to assess the impact of the entire Plan on the Welsh language and its speakers, whether positive or negative. Each individual plan is expected to study the impact on the Welsh language when conducting a separate Equality Impact Assessment. 66.9% of the respondents to the public consultation agreed with Priority Area 5. The project titled "Ensuring Fairness for Everyone" will act on every characteristic, including language.
Socio-economic Disadvantage	Positive	The Council is aware that a number of Gwynedd residents are living in unequal living conditions due to socio-economic disadvantage. Therefore, a number of the projects that are already included in the Council Plan relate to reducing socio-economic disadvantage. Examples of projects are noted below: Employment – Creating the best possible circumstances in Gwynedd for businesses and community enterprises to thrive, and support the people of Gwynedd into work Education – Transforming education for children in their early years Health – Working with Health Services to enable people to live their best life in the community. Justice and Standards of Living – Supporting People's Well-being

3.2 The Council has a duty under the Equality Act 2010 to contribute positively to a fairer society through advancing equality and good relations in its

activities in the fields of age, gender, sexual orientation, religion, race, transgender, disability and pregnancy and maternity. The Council must duly address the way any change impacts on these duties.

General Duties of the Equality Act	Does it have an impact?*	In what way? What is the evidence?
Eliminate unlawful discrimination, harassment and victimisation	Yes	The priority areas and the individual plans should have a positive impact on the duty. The Equality Impact Assessments on the individual plans will need to identify whether there are any particular matters to consider.
Promote equal opportunities	Yes	The priority areas and the individual plans should have a positive impact on the duty. The Equality Impact Assessments on the individual plans will need to identify whether there are any particular matters to consider.
Foster good relations	Yes	The priority areas and the individual plans should have a positive impact on the duty. The Equality Impact Assessments on the individual plans will need to identify whether there are any particular matters to consider.

3.3 How does your proposal ensure that you work in accordance with the Welsh Language Standards (Welsh Language (Wales) Measure 2011), to ensure that the Welsh language is not treated less favourably than the English language, and that every opportunity is taken to promote the Welsh language (beyond providing bilingual services) and increase opportunities to use and learn the language in the community?

Project – Modernising and extending the immersion provision to teach Welsh to children

It is essential that learners who are latecomers get the opportunity to learn Welsh as soon as possible, through a first-rate modern provision that is spread across Wales. It is essential that learners who are less confident in Welsh also have an opportunity to gain confidence and to improve their Welsh skills with the support of the Immersion Education System. We also wish to see our language immersion methods extended to support the Welsh language expanded in schools that serve communities where opportunities to use Welsh in the home and outside school are limited. This project in cooperation with the Immersion System and our schools will give all our learners the best opportunity to become confident Welsh speakers who can use the language in all aspects of life.

Project – Reviewing Gwynedd's Education Language Policy together with undertaking an evaluation of the Immersion System to ensure that all education policies and services provided to children and young people in Gwynedd set a firm foundation for the Welsh language.

Project – Promote the use of the Welsh Language by the residents of Gwynedd

We will conduct specific projects that will promote the use of Welsh and increase the opportunities to use the Welsh language in the community. This will include increasing the use of the Welsh language when dealing with public and community services.

Information from the individual Impact Assessments will provide further information around how the projects will operate in accordance with the Welsh Language Standards.

3.4 What other measures or changes could you include to strengthen or change the policy/practice so as to have a positive impact on people's opportunities to use the Welsh language, and to reduce or prevent any detrimental impacts that the policy/practice could have on the Welsh language?

The purpose of the Council's Plan is to identify priorities and key areas to implement between 2023 and 2028. This Equality Impact Assessment looks at the Plan in its entirety. Each individual project is expected to have a separate Assessment, whether for the entire project and/or for specific sections of it. It is the duty of the person responsible for the individual projects to undertake these Assessment(s). These assessments will need to identify any further opportunities to promote the Welsh language in their areas.

3.5 How does the proposal show that you have given due regard to the need to address inequality due to socio-economic disadvantage? (Please note that this relates to closing the inequality gap, rather than only improving outcomes for everyone).

The following are examples of projects that are included in the Plan which respond to the need to address inequality due to socio-economic disadvantage:

Employment – Creating the best possible circumstances in Gwynedd for businesses and community enterprises to thrive, and support the people of Gwynedd into work.

We will support businesses and community enterprises in Gwynedd to thrive in many ways such as developing produce and accessing new markets, helping enterprises to save money by reducing waste and make better use of technology, supporting businesses in Gwynedd to trade together and prioritise helping enterprises that commit to paying a 'real living wage' to their employees. We will promote businesses to make the most of the Welsh language, will develop more business units to let, and will strive to ensure that the North Wales Growth Deal projects benefit the people of Gwynedd. In addition, we will help the people of Gwynedd to fulfil their potential and support those who are excluded from the labour market to return to employment and will work with employers to help them to ensure they have a sufficient

workforce.

Education – Transforming education for children in their early years.

The early years are key to children's social development, and the importance of this phase was particularly evident during the pandemic. We wish to transform this service and will collaborate with the health service and Mudiad Meithrin in order to ensure that all of the county's children have the best possible start to their time in education.

Health – Using more of technology to improve the ability of Gwynedd residents to access support and care.

We need to enable the people of Gwynedd to live a good life as long as possible within their local communities. To achieve this, they need to have the required information to take advantage of community opportunities that would promote their well-being, as well as flexible methods of organising the support they need.

Justice and Standards of Living – Support People's Well-being.

Some residents find it difficult to cope with life's challenges and the situation of a number of residents has been exacerbated as a result of the cost of living crisis. These residents need support to cope, to thrive, to be safe and to keep healthy.

We have a wide network throughout our communities which helps and supports residents to cope and to respond to their various needs. This network needs support to sustain that voluntary effort, and we will work to strengthen this essential work over the coming years.

3.6 What other measures or changes can you include to strengthen or change the policy / practice to demonstrate that you have given due regard to the need to reduce disproportionate outcomes as a result of socio-economic disadvantage, in accordance with the Socio-Economic Act?

Each individual project is expected to have a separate Assessment, whether for the entire project and/or for specific sections of it, and this will include assessing the socio-economic disadvantage. It is the duty of the person responsible for the individual projects to undertake these Assessment(s). These assessments will need to identify any further opportunities to reduce inequality as a result of socio-economic disadvantage in their fields.

4) Analysing the results

4.1 Is the policy therefore likely to have a significant, positive impact on any of the above? What is the reason for this?

It appears that the priority areas should have a significant, positive impact on many of the

equality characteristics. Each individual equality impact assessment is expected to look at the impact in greater detail. This is particularly true if Covid considerations are to be fully considered in their impact assessments.

4.2 Is the policy therefore likely to have a significant, negative impact on any of the above? What is the reason for this?

No significant, negative impacts have been identified with the Plan as a whole. Each individual impact assessment looks at the impact in greater detail.

4.3 What should be done?

Select one of the following:

Continue with the policy/service as it is robust	X
Revise the policy to remove any barriers	
Suspend and abolish the policy as the harmful impacts are too great	
Continue with the policy as any harmful impact can be justified	
No further steps at present, it is premature to decide, or there is insufficient evidence	

4.4 If you decide to continue with the plan, what steps will you take to reduce or mitigate any negative impacts?

The individual assessments identify any negative impacts and the steps to mitigate them.

4.5 If you are not taking any further action to remove or reduce the negative impacts, please explain why here.

We have not identified any actions for the Plan as a whole, but it will be taken into consideration in the individual assessments.

5) Monitoring

5.1 What steps will you take to monitor the impact and effectiveness of the policy or service (action plan)?

The Council's Departments are responsible for implementing the individual schemes within the Council Plan. The Council's performance-challenging processes, where the Cabinet Member and members of scrutiny committees challenge the progress and development of the work being carried out on the Plan, is continuous work throughout the year. The reports on these performance challenge meetings are published as part of the Cabinet's meeting papers.

If it is necessary to change the content or direction of any individual project then the Equality Impact Assessment will be revisited for that project.

The Council Plan 2023-28 together with the Equality Impact Assessment are submitted to the Cabinet and the Council for scrutiny and will be reviewed annually.

CYNGOR GWYNEDD CABINET



Date of meeting:	20 February 2024
Relevant Cabinet Member:	Cllr Dyfrig Siencyn - Council Leader
Contact Officer:	Dafydd Gibbard - Chief Executive
Title of Item:	2024/25 Savings Plan

1. Decision sought

The Cabinet is asked:

- a) To approve the savings and cuts listed in Appendix A (£4.4M) to be used as a contribution towards our 2024/25 financial deficit, and commission the departments to move forward to implement the plans taking note of the issues highlighted in the report.
- b) For the purpose of setting a balanced budget in 2024/25, to approve the value of the cuts and savings listed in Appendix B (£0.8M) and note that further steps will be required before a final decision can be reached to implement them, as outlined in 2.13, and use reserves to bridge the savings that could not be realised in 24/25.
- c) To make provision of £0.52M to meet the risk level involved in realising this cuts plan.
- ch) To delegate the right to the Chief Executive, in consultation with the Leader of the Council and the Cabinet Member for Finance, to make adjustments to this Savings Plan as the maturity of the schemes listed in Appendix A and B develops, within the financial totals set out in a), b) and c) above.

2. Rationale and justification for recommending the decision

- 2.1 We now know what our Welsh Government Revenue Support Grant (RSG) level will be for 2024/25 (an increase of 2%), and that it will be significantly below the level of inflation and well below what we will need to maintain our current level of services. The fact that Gwynedd's population had fallen at the time of the 2021 census means that the RSG level of increase we will receive here in Gwynedd represents the lowest increase throughout Wales.
- 2.2 We also face a situation where departments are overspending, mainly due to continued increases in demand for their services and that it is now impossible for some services such as homelessness, children care services, adults care services and

school transport to be able to operate within their current budget. It results in overspending this year in the region of £8M. As there was no opportunity to plan ahead for this deficit, we are going to have to use reserves to cope with the situation.

- 2.3 The result of increased demand, the need to provide a higher budget for departments that are now unable to cope with their current budget, and the Government's low RSG, is that the Council faces a funding gap this year of £14.9M.
- 2.4 The Head of Finance will report to Cabinet at the same meeting as this report, which will outline how we are to cope with the impact of this deficit in setting our budget for 2024/25. The budget will have to include a combination of having to increase Council tax and delivering budget cuts across the Council. The purpose of this report is to outline how we have gone about identifying these cuts and securing Cabinet approval to implement them so that the 2024/25 budget can be set.

Procedure for identifying Savings and Cuts

- 2.5 Further to the last year's savings plan arrangements, workshops were held for all elected members in October 2023 to prioritise savings schemes for 24/25.
- 2.6 135 proposals were presented with a total value of approximately £8.2M. Each of these was assessed either by me or by one of the Directors and we placed each proposal in the following categories to help Members to be able to prioritise with an awareness of what the risk level would be to implement any individual proposal.

Efficiency saving	No need for the budget, or the service to be delivered in a different way with no substantive impact on Gwynedd residents
Efficiency saving	Service continues, but the public will see the service delivered in a different way to what they are used to seeing (fee increases included here as well)
Cut	The service is still being delivered but more slowly, to a lower standard or on a smaller scale than what the public is used to receiving. Low risk of harm to individuals in certain areas.
Cut	The service ends with clear negative implications for Gwynedd residents, including a high risk of harm to individuals in some areas.

- 2.7 We also carried out a legal assessment and a high-level financial assessment on each individual proposal to ensure they were deliverable.

2.8 When submitting their proposals, the Departments included an assessment of the impact of each proposal on Gwynedd residents along with an initial attention to equality considerations. Over a period of three days the Directors and I presented the proposals in workshops for elected Members of the Council.

2.9 During the workshops, Members placed each of the 135 proposals in one of three categories in order to prioritise all proposals from the most 'acceptable' to the least 'acceptable' proposals.

Workshop findings

2.10 There was consensus, more or less, among members taking part in the Autumn workshops, and Cabinet Members, Scrutiny Chairs and Group Leaders who took part in the workshops earlier in the year in terms of deciding which proposals should be prioritised. The conclusion was that we could implement around £5.2M of the proposals over the next two to three years, according to an approximate profile as follows:

2024/25	2025/26	2026/27
£1.97M	£2.86M	£0.34M

2.11 The list of savings and cuts is divided into Part A and Part B. List A contains the proposals that can move forward to be implemented by the Departments in accordance with what is planned. It is noted that action is subject to following the appropriate steps in terms of employment matters and any relevant notice periods. In addition, approving the plan does not prejudice the need to implement it in a manner that addresses the results of specific Equality impact assessments or assessments of individual needs and relevant notice periods.

2.12 A complete list of proposals prioritised for implementation without further action can be found in Appendix A. They can more or less be placed in the following groups in terms of the type of scheme involved:

Efficiencies - adapt working arrangements. Changing the way we go about delivering the service and delivering it in a more efficient way.	£1,007,503
Increase income This will include increasing fees for services.	£429,760

Use other sources of funding Maximizing the use of funding outside of our core resources to fund existing jobs	£70,605
Reduce resources as the demand and requirement have changed. Demand on some services has changed over the years – reducing budgets to match demand.	£240,121
Reduce capacity This will mean a delay in receiving services or a reduction in service performance.	£912,178
Review care packages Include reviewing packages for people to live more independently, use of technology, direct payments	£960,695
Reduce budgets This will mean reducing work budgets and achieving less	£742,340
Total	£4,363,202

- 2.13 The Plans listed in Appendix B reflect plans that are subject to statutory action or further decisions before they can be confirmed. Therefore, at the moment, they are proposed plans that will either need to go through specific decision processes to approve the intention or further statutory steps before they can be confirmed.
- 2.14 Although some of these savings impact on specific statutory functions they do not mean that duties will not be met.
- 2.15 Whilst Heads of Department presented their best proposals that were possible to deliver within budgets that have already been reduced significantly over years of austerity, it is not sensible to assume that all schemes will be possible to deliver once we move forward with the course of action. We also know from past experience that in some cases the financial savings will be less than what we can predict at present.
- 2.16 Therefore, in order to plan prudently we need to include a reasonable risk assumption in this Savings Plan and therefore I recommend that we give £0.52M of the total £5.2M that we will need to find as an amount to be designated "at risk".

Governance and Scrutiny Committee

- 2.17 On the 8th of February 2024, the Governance and Audit Committee scrutinised the process of identifying savings and cuts and Committee Members noted that they were satisfied that the process was thorough and comprehensive.

Looking forward to 2025/26 and 2026/27

- 2.18 The Council has now faced almost 15 years of financial austerity and faced several rounds of funding cuts. Our revenue budgets today are almost £70M less than they were at the start of that period.

- 2.19 Yet we continue to try to squeeze savings and cuts from already insufficient budgets to enable us to meet the demand we face.
- 2.20 That demand continues to increase annually in many challenging areas and the outlook of the two financial years following next year is even worse than what we have already faced.
- 2.21 As a result, it will not be possible for local authorities to continue to provide services of the same nature as that we have become accustomed to in the past and the continued introduction of cuts schemes such as these will not be likely to enable us to set a viable and balanced budget.
- 2.22 Early in the new financial year the Head of Finance will present a report detailing our medium-term financial outlook and Cabinet will inevitably have to commission work to establish how we want to prioritise what services we will be able to continue to provide in the future unless there is a change to the financial outlook.
- 2.23 We will start putting steps in place now to be able to respond to that commission.

Further considerations

- 2.24 The Well-being of Future Generations (Wales) Act 2015 involves improving the social, economic, environmental and cultural well-being of Wales. The act places a well-being duty on public bodies which is aimed at delivering the seven well-being goals, namely a prosperous, resilient, healthier, more equal Wales with cohesive communities and a vibrant culture and thriving Welsh language which is globally responsible. The plan was prepared within the principles of the Act.
- 2.25 Reducing the impact on the residents of Gwynedd and future generations was at the core of the process of identifying savings and cuts. The process in itself has filtered the proposals identifying those with the least impact, and to protect the well-being objectives / priority areas in the Council's Plan.
- 2.26 In accordance with the legal duties under the Equality Act 2010 ("The Act") (including Welsh public sector duties) when making decisions, the Council must give due attention to the need (1) to eliminate unlawful discrimination (2) advance equality of opportunity and (3) encourage good relations based on the protected characteristics.
- 2.27 The implications and impacts were assessed in accordance with the duty under the Act when developing and prioritizing the proposals. An Equality Impact Assessment has been prepared in Appendix C which assesses the impact of the recommended savings. The nature of the impacts identified is negative in terms of the Disability and Age feature and that is mainly due to the potential impact that the Department of Adults, Health and Well-being plans will have on service users. In addition, there are no socio-economic disadvantages through proposals relating to raising income

through fees. It is recognized that some plans involve further actions which will be the subject of specific assessments regarding the way of action. It is intended that these aspects are kept under constant review when moving to realize the specific plans and we will ensure that the departments mitigate any negative impact when implementing.

3. Views of the Statutory Officers:

i. Monitoring Officer:

This programme of proposed savings and cuts has been subject to a detailed assessment process as explained. However, it must be recognised that there are a range of schemes here that represent service cuts that will have various impacts. Some are also subject to following legal processes or further assessments and this is appropriately recognised in the implementation arrangements. Further work will be involved in several elements of the programme, and this is set out in the report. It is also appropriate to note that the Cabinet is assured in relation to compliance with statutory duties. An Equalities and Language impact assessment has been prepared as part of the process and the Cabinet needs to consider its findings in coming to a decision. The proposed delegation is also appropriate. Adoption of this savings programme allows the Cabinet to recommend a balanced Budget to the Full Council. I am satisfied with the propriety of the report.

ii. Statutory Finance Officer:

Finance Officers have worked closely with the author of the report, and I can confirm the accuracy of the figures contained therein. Realising savings to the values set out is essential to enable us to set a balanced budget for 2023/24/25

Appendices

Appendix A: List A - Savings and Cuts

Appendix B: List B - Savings and Cuts

Appendix C: Equality Assessment

Appendix A – List A

Education Department's Savings Proposals List

Amount £	Budget Heading and Proposal
£24,740	Transfer Maesgeirchen Youth Centre into Maes Ni Community Hub.
£24,700	Restructuring of Education Data Unit
£125,000	Adjust the out-of-county budget to align with actual spending
£45,800	Stop the provision of thematic resources packs
£18,000	Amend the Key Stage 4 Behaviour hubs arrangements
£24,000	Reducing the internal Youth Service training budget
£50,720	Review the managerial structure of the Youth Service protecting the frontline resource
£18,000	Library Service for Schools – review the level of provision of Lori Ni
£67,676	Reduce the staffing resource in the ADP unit
£23,000	Reduce staffing resources in the Inclusion team
£70,000	Reducing Gwynedd's contribution to GwE
£491,636	TOTAL

Environment Department's Savings Proposals List

Amount £	Budget Heading and Proposal
£360,000	Increase income by collecting Commercial Waste from holiday accommodation
£15,000	Countryside Service (Rights of Way and Access) - Not accepting inflationary increases on budgets.
£10,280	Traffic and Projects - No Inflation on budget to deliver improvements to stretches of the highway
£9,000	Trading Standards – Reduce budget to evidence criminal law violations and expert proactive work
£29,636	Reduce the structure of the Public Protection support team by 1 post
£33,410	Delete 1 x Support and Technical Assistant post which supports traffic and projects units and parking and street works
£100,000	Review the level of staff resource and / or restructure the services within Public Protection
£557,326	TOTAL

Corporate Support Department's Savings Proposals List

Amount £	Budget Heading and Proposal
£9,760	Increase the fee for translation work
£17,160	Procurement - Stop using the on-line ordering system 'marketplace' which is used to order stationery.
£19,190	Communication and Engagement - Stop publishing the Newyddion Gwynedd paper
£43,500	Restructure the Human Resources Advisory Service
£61,813	Restructure and reduce the Management Unit's staffing resources
£26,320	Organisational Learning and Development - Delete one post within the structure
£50,860	Procurement - Delete one post of the structure of the Procurement Service
£21,370	Emergency Planning - Withdrawal from the regional Emergency Planning agreement and provide the service in-house
£41,610	Organisational Learning and Development - Cut supplies budget
£50,000	Customer Contact - cutting Siop Gwynedd's opening hours at the three main offices
£30,000	Reduce the resource in the Council's Business Support Team
£40,617	Restructure the service within the 2024/25 year and reduce the staffing resource as a result
£33,300	Communication and Engagement - Delete the post of Communications Officer
£445,500	TOTAL

Finance Department's Savings Proposals List

Amount £	Budget Heading and Proposal
£85,000	Savings from rationalising agreement / numbers of mobile phones
£30,000	Reduce use of electricity in the Council's IT data centre
£30,000	Electricity savings by switching off equipment outside core hours
£15,000	Taxes - Reduce overtime budget and aim to complete the work within core hours
£24,200	Management Unit - Delete the post of Executive Support Officer / Assistant Accountant completely
£70,000	IT - reduce the opening hours of the IT Help Desk
£31,530	Payroll - Cut a Salary Technician post
£29,360	Payments - delete one post
£12,590	Benefits – Reduce the hours of a benefit assessment job
£37,840	Accounting – Review the accounting staff resource
£45,340	Internal Audit – restructuring
£45,000	Income – restructuring
£455,860	TOTAL

Economy and Community Department Savings Proposals List

Amount £	Budget Heading and Proposal
£25,000	Arfon Tennis Centre lighting upgrade to create energy cost saving
£51,088	Libraries - efficiencies in adapting working arrangements
£10,143	Economic Development Programmes - Surrender the remaining budget from transferring a job to another Department
£1,000	Marketing and Events – Not subscribe to two tourism associations
£3,250	Marketing & Events - Cutting consortia membership pay
£20,000	Maritime – Reduce a proportion of spending on beach clean-up
£14,136	Archives – review staffing resource
£30,000	Libraries - Reduce the expenditure on the books fund due to fewer loans
£39,793	Marketing & Events - Cut Marketing & Events post
£20,728	Regeneration - Save 40% of an Executive officer
£5,000	Reduce community art activity budgets
£5,000	Reduce children's summer fun activities
£3,090	Reduce children's summer reading challenge activities
£7,120	Cut the budget for the Snowdonia website text development
£235,348	TOTAL

Adults, Health and Well-being Department's Savings Proposals List

Amount £	Budget Heading and Proposal
£79,469	Cut 2.5 FTE administrative job across the Services
£150,000	Residential and Nursing Homes: Help 20 individuals to continue to live in the community (as opposed to a residential care home)
£21,303	Not fill a Support Worker vacancy
£33,000	Telecare Service – Review specific care packages and provide technology/telecare expert input to reduce the need for traditional care/support
£30,900	Provider Service Management and Administration: Cut one admin post by restructuring
£193,089	Learning disabilities: a) Transfer 10 Support Services packages to Direct Payments over time. b) Look at 1:1 support with a view to saving 10% by increasing group/work opportunities c) Reduce Support Services travel by 25%
£50,000	Look at arrangements for preparing second choice meals in care homes
£12,000	Cut 0.2FTE off the Well-being Team Leader post who is responsible for Carers issues
£157,060	a) Re-assess 5 Supported Accommodation cases that receive 1:1 or 2:1 hours (20% saving on 5 cases) b) Establish tenancies in one supported accommodation
£377,546	Savings of 10% on private contracts and internal day services by reviewing 1:1 and 2:1 packages
£22,200	Income and Welfare Unit: Cut half a post (0.5 FTE)
£15,630	Adults and Children Finance Processing Team: Cut half a post (0.5 FTE)
£20,940	Reduce the hours of the Well-being Officer
£1,163,137	TOTAL

Highways, Engineering and YGC Department's Savings Proposals List

Amount £	Budget Heading and Proposal
£65,000	Review the Business Service of the Highways, Engineering and YGC Department
£60,000	Adjust the timing of our road gritting and carry it out within working hours, where possible
£25,000	Refine the street lighting dimming scheme
£25,000	Increase the crematorium fee
£35,000	Increase cemeteries fee
£46,000	Change of system to rural high-ground cuts/frequency/vertical and the time between the growing seasons
£20,000	To not employ a grounds maintenance seasonal workforce
£250,000	Restructure the Highways Service
£40,000	Amendments following the introduction of the Street Scene Service
£71,000	Reduce the structures maintenance work programme
£185,000	Reduce the road dressing programme of the highway maintenance service
£60,000	Reduce the programme to re-surface footpaths
£882,000	TOTAL

Housing and Property Department's Savings Proposals List

Amount £	Budget Heading and Proposal
£18,390	Delete Travellers' support vacant post
£43,400	Cut one Enforcement Officer post
£70,605	Estates Unit - fund work on the Housing Action plan by the Senior Estates Surveyor and half an Assistant Estates Surveyor's post through the Council Tax Premium
£132,395	TOTAL

Appendix B – List B

Environment Department's Savings Proposals List

Amount £	Budget Heading and Proposal
£78,000	Parking and Street Works - Extend Parking Enforcement Hours in the Council's Short Stay Car Parks.
£160,000	Parking and Street Works - Adjust the Band 2 Long-Stay Fees Structure
£146,910	Waste Services – single-use nappy collection arrangements
£20,000	Waste Service - garden waste collections
£200,000	Waste Service – frequency of Residual Waste Collections
£604,910	TOTAL

Economy and Community Department Savings Proposals List

Amount £	Budget Heading and Proposal
£35,000	Country Parks - Income from Y Glyn car park, Llanberis
£17,000	Arts - Cut the budget for strategic grants
£52,000	TOTAL

Adults, Health and Well-being Department's Savings Proposals List

Amount £	Budget Heading and Proposal
£100,000	Learning Disabilities: Charge a reasonable fee as a contribution towards the cost of learning disabilities day services
£49,040	Continue to fund the third sector at the same level as 2023/24 without adding inflation
£149,040	TOTAL

Assessing the Impact on Equality Characteristics, the Welsh language and the Socio-Economic Disadvantage

Please see the leaflet *How to Make an Equality Impact Assessment* for support to complete this form. You are also welcome to contact Delyth Williams, Policy and Equality Officer on ext. 32708, or DelythGadlysWilliams@gwynedd.llyw.cymru for further assistance

The Council is required (under the Equality Act 2010) to consider the impact that any changes in any policy or procedures (or the creation of a new policy or procedure) will have on people with protected equality characteristics. The Council also has additional general duties to ensure fairness and to foster good relationships. Therefore, a timely assessment should be made before any decision is taken on any relevant change (i.e., that affects people with protected equality characteristics). The Council also has additional general duties to ensure fairness and to foster good relationships. Therefore, a timely assessment must be made before a decision is taken on any relevant change (i.e. that affects people with protected equality characteristics).

The Council is also required, under the requirements of the Welsh Language Standards (Section 44 of the Welsh Language (Wales) Measure 2011), to consider the impact that any change in policy or procedure (or the creation of a new policy or procedure), will have on opportunities for people to use the Welsh language and to ensure that the Welsh language is not treated less favourably than English. This document therefore ensures that these decisions safeguard and promote the use made of the Welsh language. This document therefore ensures that these decisions safeguard and promote the use made of the Welsh language.

From 1 April 2021 onwards, the Council has a duty to give due attention to addressing socio-economic disadvantage in strategic decisions.

1) Details

1.1 What is the name of the policy / service in question?

Savings and Cuts 2024/2025

1.2 What is the purpose of the policy/service that is being created or amended? What changes are being considered?

Savings and cuts to meet the financial gap the Council faces in the 2024/2025 budget.

1.3 Who is responsible for this assessment?

Dafydd Gibbard

1.4 When did you commence the assessment? Which version is this?

There was an informal assessment by the departments in September 2023. This formal assessment was started on 17 January 2024.

2) Implementation

2.1 Who are the stakeholders or partners with whom we will have to work to carry out this assessment?

Council Departments
The People of Gwynedd
The Cabinet
Elected members in savings workshops

2.2 What steps have you taken to engage with people with protected characteristics, regarding the Welsh language or with communities (either due to location or due to need), who are living with a socio-economic disadvantage?

No specific engagement has taken place to date but a corporate engagement process has meant that Elected Members have had the opportunity to provide input based on their awareness of their areas and what their constituents are raising with them.

Departments will need to decide what level of engagement will be required to carry out their individual impact assessments and that will feed into the method of implementation.

2.3 What was the outcome of the engagement?

The plan has been developed and co-designed to include members' views.

2.4 On the basis of what other evidence are you acting?

We now know what our Welsh Government Revenue Support Grant (RSG) level will be for 2024/25 (an increase of 2%), and that it will be significantly below the level of inflation and well below what we will need to maintain our current level of services. The fact that Gwynedd's population had fallen by the time of the 2021 census means that the RSG level of increase we will receive here in Gwynedd represents the lowest increase throughout Wales.

We also face a situation where departments are overspending, mainly due to continued increases in demand for their services and that it is now impossible for some services such as homelessness, children care services, adults care services and school transport to be able to operate within their current budget. It results in overspending this year in the region of £8M. As there was no opportunity to plan ahead for this deficit, we are going to have to use reserves to cope with the situation.

The result of increased demand, the need to provide a higher budget for departments that are now unable to cope with their current budget, and the Government's low RSG, is that the Council faces a funding gap this year of £14.9M.

When submitting their proposals, the Departments included an assessment of the impact of each proposal on Gwynedd residents along with an initial consideration of equality considerations. Over a period of three days the Directors and the Chief Executive submitted the proposals to workshops of elected Members of the Council.

There are proposals relating to raising income through fees. Due to the cumulative effect and the fact that increased payments like this inevitably have a greater impact on people living with socio-economic disadvantage than others this is going to have a greater impact on some people.

2.5 Are there any gaps in the evidence that needs to be collected?

It is possible that, due to a lack of adequate information, there is an impact on certain features and it is important to look at them individually to identify if a full assessment needs to be undertaken. Of course an impact assessment may have been done on a number of these already.

3) Identifying the Impact

3.1 The Council must duly address the impact that any changes will have on people with the following equality characteristics. What impact will the new policy/service or the proposed changes in the policy or service have on people with these characteristics? It is also necessary to consider the impact on Socio-Economic disadvantage and on the Welsh Language.

Characteristics	What type of impact?	In what way? What is the evidence?
Race (including nationality)	Neutral	The impact appears to be neutral in terms of the scheme, but it is necessary for departments to ensure that they carry out an impact assessment on the individual issues.
Disability	negative	The Adults, Health and Well-being Department has identified the possibility of an impact on those who use the services. That department will ensure that they mitigate any impact by assessing the needs of individuals. Other proposals have also been identified as having an impact on disabled people and impact assessments will be expected to be undertaken on the individual proposals to identify and mitigate the full impact. It is also important to recognise that disabled people will be cumulatively affected as they are the cohort that will be affected the most.
Gender	Neutral	The impact appears to be neutral in terms of the scheme, but it is necessary for departments to ensure that they carry out an impact assessment on the individual issues.
Age	negative	The Adults, Health and Well-being Department has identified the possibility of an impact on those who use the services. That department will ensure that they mitigate any impact by assessing the needs of individuals. Other proposals have also been identified as having an impact on age and impact assessments will be expected to be undertaken on the individual proposals to identify and mitigate the full impact.
Sexual orientation	Neutral	The impact appears to be neutral in terms of the scheme, but it is necessary for departments to ensure that they carry out an impact assessment on the individual issues.
Religion or belief (or non-belief)	Neutral	The impact appears to be neutral in terms of the scheme, but it is necessary for departments to ensure that they carry out an impact assessment on the individual issues.
Gender reassignment	Neutral	The impact appears to be neutral in terms of the scheme, but it is necessary for departments to ensure that they carry out an impact assessment on the individual issues.
Pregnancy and maternity	Neutral	The impact appears to be neutral in terms of the scheme, but it is necessary for departments to ensure that they carry out an impact assessment on the individual issues.
Marriage and civil partnership	Neutral	The impact appears to be neutral in terms of the scheme, but it is necessary for departments to ensure that they carry out an impact assessment on the individual issues.
The Welsh language	Neutral	The impact appears to be neutral in terms of the scheme, but it is necessary for departments to ensure that they carry out an impact assessment on the individual issues.
Socio-Economic Disadvantage	negative	There are proposals relating to raising income through fees. Due to the cumulative effect and the fact that increased payments like this inevitably have a greater

		impact on people living with socio-economic disadvantage than others this is going to have a greater impact on some people. We will ensure that the relevant departments mitigate any negative effects when implementing. It is possible that some of the savings are going to influence the quality of some of the Council's activities but also this impact is marginal in the context of what is happening externally e.g. promoting the tourism field.

3.2 The Council has a duty under the Equality Act 2010 to contribute positively to a fairer society through advancing equality and good relations in its activities in the fields of age, gender, sexual orientation, religion, race, transgender, disability and pregnancy and maternity. The Council must duly address the way any change impacts on these duties. The Council must duly address the way any change impacts on these duties.

General Duties of the Equality Act	Does it have an impact?	In what way? What is the evidence?
Eliminate unlawful discrimination, harassment and victimisation	No	The effect mentioned in 3.1 is not thought to be sufficient to lead to discrimination, harassment or persecution.
Promote equal opportunities	Possible	As an impact has been identified, careful action will have to be taken to ensure that the changes do not affect this duty.
Building good relationships	Possible	As an impact has been identified, careful action will have to be taken to ensure that the changes do not affect this duty.

3.3 How does your proposal ensure that you work in accordance with the Welsh Language Standards (Welsh Language (Wales) Measure 2011), to ensure that the Welsh language is not treated less favourably than English, and that every opportunity to promote the Welsh language is taken (beyond providing bilingual services) and increase opportunities to use and learn the language in the community?

This Integrated Impact Assessment looks at the Savings Plan as a whole. It is likely that the same services will be available in Welsh and English following the savings so the Welsh language will not be treated less favorably than English. However, it is likely that a reduction in resources will generally affect the ability to increase existing opportunities to use and learn the

language in the community.

Each individual plan is expected to have a separate Assessment on the plan as a whole and/or on specific parts of it. These assessments will need to identify any further opportunities to promote the Welsh language in their areas. It is the duty of the person responsible for the individual plan to make that Assessment(s).

3.4 What other measures or changes could you include to strengthen or change the policy / practice to have a positive impact on people's opportunities to use the Welsh language, and to reduce or prevent any detrimental impacts that the policy/practice could have on the Welsh language?

n/a

3.5 How does the proposal show that you have given due regard to the need to address inequality due to socio-economic disadvantage? (Please note that this relates to closing the inequality gap, rather than improving outcomes for everyone only).

Many characteristic groups are also more prone to living in poverty. But they will also be affected by other forms of poverty, which relate to access to services, digital poverty etc.

There are proposals relating to raising income through fees. Due to the cumulative effect and the fact that increased payments like this inevitably have a greater impact on people living with socio-economic disadvantage than others this is going to have a greater impact on some people.

There are one or two proposals which have been identified for another reason. They involve reducing support for tourist companies. Many people who work in that sector are on low wages, but they may lose that income if the sector does not thrive.

3.6 What other measures or changes can you include to strengthen or change the policy / practice to demonstrate that you have given due regard to the need to reduce disproportionate outcomes as a result of socio-economic disadvantage, in accordance with the Socio-Economic Act?

This will be addressed more thoroughly in the individual assessments

4) Analysing the results

4.1 Is the policy therefore likely to have a significant, positive impact on any of the above? What is the reason for this?

These have varying impact and will be constantly monitored in their implementation, but it must be accepted that they are savings schemes in response to a National financial austerity situation.

4.2 Is the policy therefore likely to have a significant, negative impact on any of the above? What is the reason for this?

Cause accumulative equality impacts

In the initial assessment this term was used to identify proposals relating to income generation by charging additional fees for the public (as opposed to other organisations). It is often assumed that charging this kind of fee will not have a prejudicial impact as they affect everyone who needs the service the same. However, this is not true, they certainly affect people who live in poverty more than other people. Statistics show that some groups of equality characteristics fall into this category. Families that include a disabled person are statistically more likely to be poorer than other families, as are single-parent families (which usually have a woman as the head of the family). 29% of children live in poverty. Some people from ethnic minority groups tend to be poorer, and some older people, and increasingly so. It must also be remembered that the impact of this is only getting worse because of the economic situation of the country as a whole.

But also one should look at the picture in general to see if any other cumulative effect is caused. It is clear from this initial assessment that some cohorts are more affected by these proposals – most specifically older people and people with disabilities. There will therefore be a noticeable cumulative effect on them.

4.3 What should be done?

Select one of the following:

Continue with the policy / service as it is robust	
Revise the policy to remove any barriers	
Suspend and abolish the policy as the harmful impacts are too great	
Continue with the policy as any harmful impact can be justified	X
No further steps at present, it is premature to decide, or there is insufficient evidence	

4.4 If you continue with the plan, what steps will you take to reduce or mitigate any negative impacts?

The departments will work to ensure they mitigate any negative impacts.

4.5 If you are not taking any further action to remove or reduce the negative impacts, please explain why here.

n/a

5) Monitoring

5.1 What steps will you take to monitor the impact and effectiveness of the policy or service (action plan)?

The savings will be challenged at the performance monitoring meeting 4 times a year. In addition, a Savings Overview report will be presented to Cabinet 3 times a year.

Meeting: Cabinet

Date: 20 February 2024

Cabinet Member: Councillor Ioan Thomas, Cabinet Member for Finance

Subject: 2024/25 Budget

Contact Officer: Dewi Morgan, Head of Finance

2024/25 BUDGET

Decision Sought

Recommend to the Council (at its meeting on 7 March 2024) that:

1. A budget of £330,590,040 should be set for 2024/25, to be funded by £232,092,110 of Government Grant and £98,497,930 of Council Tax income (which is an increase of 9.54%).
 2. A capital programme of £85,224,800 in 2024/25 should be established, to be funded from the sources set out in Appendix 4 of the report.
-

1. INTRODUCTION

- 1.1 The Council must set a balanced budget for 2024/25.
- 1.2 This budget is set at a time when Welsh local authorities are facing financial challenges, particularly in the context of overall inflation having reached levels in 2022/23 and 2023/24 unprecedented for decades, the impact of which has worked its way through to the 2024/25 budget.
- 1.3 Cyngor Gwynedd has received a grant increase for 2024/25 of 2.0%, equivalent to an £4.1m increase in external funding.
- 1.4 By 2024/25, our spending would need to be increased by £22.4m in order to "stand still" (details are in part 3 below). This includes £5.1m to meet pressures on service budgets (details of the individual 'bids' are in Appendix 2).

- 1.5 It is seen in this report that demand pressures on services, as well as inflationary pressures indicate that a combination of Council Tax increases and the introduction of a new programme of savings and cuts must be considered if a balanced budget is to be set for 2024/25. The 2024/25 budget seeks to protect the services the Council provides to the people of Gwynedd and recommends a 9.54% increase in Council Tax to achieve that objective this year. Even then, we will need to look for additional savings and use funds of to set a balanced budget, and forecasts suggest there will be further pressure in aiming to set a balanced budget for 2025/26.
- 1.6 Savings and cuts plans are the subject of a separate report on the programme for this meeting.
- 1.7 The savings that have been identified have been subject to consultation with Council members in a series of workshops in October 2023. The draft budget has been considered by a majority of Council members at a briefing session on the financial situation held on 16 January 2024, and scrutinised by the Governance and Audit Committee on 8 February. The role of Cabinet is to recommend a balanced and appropriate budget to the Council meeting on 7 March for 2024/25.
- 1.8 The 2024/25 budget includes a substantial proportion of the savings that have slipped from previous years, saving identified when setting the 2023/24 budget, as well as new savings.
- 1.9 This year we propose to establish a capital programme worth £85.2m in 2024/25, as set out in Appendix 4.
- 1.10 It is for full Council to consider the budget and set Council Tax for 2024/25 based on the issues identified in the following report. This detailed report sets out the factors influencing the proposed revenue budget for 2024/25, and outlines the main changes since 2023/24.

2. WELSH GOVERNMENT GRANT

- 2.1 The Welsh Government has announced the indicative local authority funding settlement for 2024/25 as follows:

Revenue Support Grant 2023/24 – 2024/25	Total Welsh Authorities £	Cyngor Gwynedd £
2023/24 Government Grant	5,110,643,128	227,541,286
2024/25 Government Grant	5,689,688,839	232,092,112
Increase £	403,245,272	4,550,826
Increase %	3.1%	2.0%

The Government will not publish its final budget until 27 February 2024 and final local government settlement will be published soon after that. Further details of the provisional settlement can be found here –

[Local government revenue and capital settlement: provisional 2024 to 2025 | GOV.WALES](#)

- 2.2 Official Welsh Government figures in the table above show notionally that Cyngor Gwynedd is receiving a grant increase of £4.6m by next year (after adjusting the relative 2023/24 figure to reflect changes to the taxbase), which is an 2.0% increase, while the average across Wales is 3.1%.
- 2.3 A number of factors feed into the local government grant allocation formula, such as the county's population, the number of pupils in our schools, and the number of income support claimants. This year, there has been a significantly greater increase in these numbers in other authorities. In particular, it is noted that the impact of the 2021 Census – which shows a decline in Gwynedd's population, has had a significant impact on our grant allocation compared to other authorities.
- 2.4 The Welsh Government will publish the final grant settlement for local authorities soon after announcing its final budget on 27 February, which will be followed by a relevant debate in the Senedd. On 24 January, the UK Government announced a £600m funding increase for local government in England. It is possible that some additional funding will be available for councils in Wales as a result of this, but there will not be confirmation either way until the final settlement is announced.
- 2.5 If the grant figure changes up or down at the time of the publication of the Final Settlement, so late in the 2024/25 budget and tax-setting round, it would possibly be too late to change council tax figures. It should be noted that this budget already includes a provision for the use of funds in case there is a change to the circumstances (e.g. a change to the settlement, or inflation).

3. COUNCIL REVENUE EXPENDITURE - 2024/25

- 3.1 The increase in expenditure required to "stand still" in 2024/25 is set out in the table below.

Additional Expenditure Requirements

	£	£
Base Budget		318,073,360
Staff Salary Inflation	15,113,520	
Teachers' Pension	2,360,670	
Teachers' Pension Grant	(2,360,670)	
Other Inflation (suppliers)	6,808,810	
Electricity Inflation Provision	(2,981,350)	
Levies (Fire, NRW & CJC)	342,000	
Demography	(37,820)	
Bids – Pressures on Services	5,052,820	
Various Budget Adjustments	375,530	
Borrowing Costs / Interest on Balances	(1,250,000)	
Specific Grant Adjustments	382,570	
Covid Provision	(1,400,000)	
Net total of increases		<u>22,406,080</u>
Total spending 2024/25 requirements before savings		<u>340,479,440</u>

3.2 Base Budget 2023/24

Although the net expenditure for 2023/24 was £318m, it is important to note that the Council's actual expenditure is £539m, because we receive a host of specific grants worth £149m and charge an overall income of £72m for services we provide.

3.3 Salary Inflation £15.1m

An agreement was reached on workforce pay (apart from teachers) for April 2023 to March 2024 by agreeing an increase of £1,925 up to pay point 43, and then 3.88% to pay point 44 and above. In line with most other local authorities, we had budgeted prudently for a 6% increase, but the final agreement exceeded what had been budgeted for. The result is that the wage inflation in the 2024/25 budget includes an element to correct this gap as well considering the notional inflation of 2024/25.

This budget sets aside the objective of an increase in the 2024/25 pay agreement of 5% for the whole workforce (teachers from September 2024, remaining workforce from April 2024).

3.4 Teachers Employer's Pension Contribution

There will be an increase in the employer's contribution towards the teachers' pension scheme with an additional cost of £2.36m. This budget has been set on the basis that the cost will be fully funded by the Government.

3.5 Other Inflation £6.8m

This is a 'net' amount which includes provision for a range of changes dependent on the rate of inflation in a number of specific areas. The main areas where increases are seen are:

- Independent Residential Care Homes £2.8m
- Non-residential Care £1.3m:
 - Supported Housing £807k,
 - Domiciliary Care £228k,
 - Other services £217k
- Energy (Electricity) £1.6m
- Fuel (Diesel and Petrol) £63k
- Increase in other prices:
 - Insurance £270k
 - Property rates £159k

3.6 Electricity Inflation Provision (£3m)

There was an assumption when preparing the 2023/24 Budget that inflation on electricity budgets would be significant. But it transpired that the inflation was not as much as expected, so the budget can be released.

3.7 Levies £342k

The levies paid to the relevant bodies will increase as follows between 2023/24 and 2024/25:

• North Wales Fire and Rescue Authority	£343k
• Snowdonia National Park Authority	£0
• Natural Resources Wales (Special Levies)	£4k
• North Wales Corporate Joint Committee (CJC)	(£5k)

The increase of £343k to the North Wales Fire and Rescue Authority levy is equivalent to an increase of 0.39% in council tax.

3.8 Demography (£38k)

A net total which reflects -£48k due to a net reduction in pupil numbers in schools and +£10k due to an increase in children looked after by the Children and Supporting Families Department.

The net figure of -£48k for schools masks a different situation in different sectors, namely secondary +£167k, special +£259k and primary -£474k.

3.9 Pressures on Services £5.1m

Appendix 2 contains details of each individual request for additional expenditure arising from pressures on the services.

It is recommended that bids worth £5.1m for additional permanent resources submitted by Council departments to meet inevitable pressures on their services are approved.

All departments are asked to identify any expenditure the Council must deliver to ensure continuity of basic service. The procedure here is not for desirable new developments, but rather for the continuation of existing basic services.

An element of these applications of course manifests itself as we review the current year's spending patterns. Others are the result of issues arising where spending is necessary to protect outcomes for the public, or to meet statutory requirements. There is also an element of central government creating pressures and expectations, followed by the Council having to cope with the knock-on effects.

The items presented in Appendix 2 have been thoroughly challenged by the Leadership Team before being recommended for Cabinet approval. Furthermore, all these spending requests were presented at the Budget Seminar held on 16 January 2024.

3.10 Various Budget Adjustments (£1.9m)

A total reflecting a significant number of adjustments to different budgets across the Council. This includes the impact of an increase in interest receipts of (£1.25m) in returns in investing balances and the Council's cash flow, releasing the provision of (£1.4m) that was in place for expenditure arising from the Covid crisis, but a cost increase of £758k due to budgeting for the reduction of the Social care Workforce grant received from the Government together with other budgetary considerations

4. EXISTING SAVINGS THAT HAVE ALREADY BEEN APPROVED

4.1 Cyngor Gwynedd has delivered over £39.1m of savings plans since 2015/16.

4.2 On 14 February 2023 the Cabinet approved a programme of savings worth £6.4m for the budget of 2023/24 onwards. The profile of this programme is seen in Appendix 3, which shows that £2,848,630 of these savings are profiled for 2024/25.

4.3 Schools savings of £819,500 have also been programmed to be implemented from the 2024/25 financial year.

4.4 Further, there is one savings plan of £15,000 which remains from previous savings programmes which is relevant for 2024/25.

4.5 The value of these savings by department is summarised in the following table.

Savings that have already been programmed to reduce the 2024/25 Funding Gap	
	£
Adults, Health and Wellbeing Department	1,193,040
Schools	819,500
Environment Department	562,870
Highways, Engineering and YGC Department	390,000
Finance and I.T. Department	207,720
Children and Families Department	157,960
Housing and Property Department	128,840
Education Department	111,880
Economy and Community Department	65,660
Corporate Support Department	45,660
Subtotal	3,683,130
Less: Provision	(569,730)
Existing Planned Savings 2024/25	3,113,400

5. FUNDING GAP 2024/25 AND COUNCIL TAX

- 5.1 Part 3 above shows that the Council's spending needs (before savings are removed) for 2024/25 are £340.5m. Part 2 noted that the grant from the Welsh Government will be £232.1m.
- 5.2 As explained in part 4 above, there are a total of £3,113,400 of savings to be used to reduce the funding gap.

Establishing the 2024/25 Budget	
	£
2023/24 Base Budget	318,073,360
Additional Expenditure Requirements	<u>22,406,080</u>
2024/25 Expenditure Requirements before Savings	340,479,440
less Welsh Government Revenue Grant Income	(232,092,110)
Funding Gap from Council Tax and further savings	<u>108,387,330</u>

- 5.3 That means there is a residual gap of £108.4m that needs to be filled. There is a separate report on the agenda of the Cabinet meeting which recommends the implementation of new £4.78m (adjusted to include savings risk). However, only £1.82m (adjusted to include savings risk) can be drawn from the 2024/25 budget with the remainder to be drawn from the 2025/26 and 2026/27 budgets. Funds worth £2.96m will have to be transferred from reserves to fund the savings that have been profiled to the following years when setting the 2024/25 budget.
- 5.4 In addition, it is suggested to delay before deciding on any further savings/cuts worth £2m, again using funds to bridge the shortfall. Given the £3.11m of savings already approved for 2024/25 previously (see Part 4 above), it is recommended that a total of £4.93m of savings and £4.96m of reserves contribute to filling the financial gap.

Funding Gap from Council Tax and Savings	108,387,330
Less Existing Savings already approved	(3,113,400)
Less new Savings	(1,816,360)
Less bridging new savings for reserve	(2,959,640)
Less delaying Savings from reserves	(2,000,000)
Funding Gap from Council Tax	<u>98,497,930</u>

- 5.5 Further details on the savings are found in Appendix 3.

- 5.6 It is recommended that the remainder of the gap is to be greeted through Council Tax. Whether to increase the Tax on individual dwellings by 9.54% will generate £98,497,930 of income, and this would be sufficient to fill the gap.
- 5.7 This will be £8.6m of additional Council Tax income compared to the 2023/24 budget. That equates to a Council Tax increase of £152.89 for properties in Band D, or £2.94 a week. The tax levied by the Police and Crime Commissioner (an increase of 4.97% for 2024/25) and the community councils (various %) will of course be in addition to this.
- 5.8 Background information and the context for setting the Tax level is set out in Appendix 6.
- 5.9 If Council members wanted a less than 9.54% increase in the level of Tax, then fewer permanent resources would have to be committed to deal with the pressures on services, there would be a need to find further savings and cuts, or a combination of both.
- 5.10 The choice between maintaining services and taxation is always a difficult one. For 2024/25 it is expected that the proposal to raise the tax by 9.54% to meet the pressures on services while setting a balanced budget will be a similar level to the majority of authorities in north Wales.

6. CONCLUSIONS / BUDGET 2024/25

- 6.1 This report and the appendices set out the factors that should be taken into account in establishing the 2024/25 budget and historic savings will still have to be harvested, new saving will have to be introduced, and the level of tax will need to be raised to set a balanced budget.
- 6.2 It is recommended that revenues of £340.5m be spent, having added £22.4m, which includes the provision of £5.1m to address demand for services.
- 6.3 Having received a grant from Welsh Government of £232.1m, relying on £4.93m of savings (£3.11m of historic savings that have already been programmed and £1.82m of new savings) and £4.96m from reserves. The level of Council Tax will need to increase by 9.54% to generate £98m of income to close the 2024/25 funding gap.

Balanced budget for 2024/25	
	£
2024/25 Expenditure Requirements before Savings	340,479,440
2024/25 Savings Total	(4,929,760)
2024/25 Bridging from Reserves Total	(4,959,640)
2024/25 Budget	<u>330,590,040</u>
To be funded from -	
Grant Income	232,092,110
Council Tax (yield after raising 9.54%)	<u>98,497,930</u>
2024/25 Budget	<u>330,590,040</u>

- 6.4 This will involve setting a net budget of **£330,590,040**. A breakdown of the budget per service is given in Appendix 1.

7. CAPITAL

- 7.1 The 2019/20 – 2028/29 asset strategy was established by full Council on 7 March 2019. The new asset strategy is operational for the period 2019/20 to 2028/29. It will be incorporated as part of the Capital Programme, and we are adding to that by 2024/25. Details of the current capital programme can be found in Appendix 4.
- 7.2 The two tables shown in Appendix 4 reflect the capital requirements, together with the funding, for setting the 2024/25 to 2026/27 capital budget, in order to establish a whole programme worth £85,224,800 in 2024/25, to be funded from the sources analysed in Appendix 4.
- 7.3 The table in Appendix 4 states that £500k is available annually for the funding of capital bids. For 2024/25, £428k from this budget has been earmarked for the 9 relevant capital bids detailed in Appendix 2b.

8. LONGER TERM STRATEGY

- 8.1 When announcing the draft 2024/25 settlement in December 2023, the Welsh Government has not given an indication of the increase in grant that will be paid to Welsh local authorities from 2025/26. However, the outlook is not positive, and Cyngor Gwynedd, like all other councils, is expected to receive below-inflation increases in future – and perhaps no increase at all.
- 8.2 In considering the increased demand for services on the Council, in the face of shrinking provision as a result of cuts, there will need to be an early, fundamental consideration of what the Council can provide and how. As can be seen in Appendix 3, further saving plans have been programmed for 2025/26 and beyond but work will commence immediately after setting the budget for 2024/25 on updating a Medium Term Financial Plan that recognises the situation as envisaged.

9. OTHER CONSIDERATIONS AND VARIOUS ASSESSMENTS

- 9.1 The current level of the Council's general balances is £7.9m. Given the increased pressures expected on the Council's budgets over the next few years, it is considered that this level of balances will be appropriate to reserve for practical cash flow and unexpected expenditure. Information on the balances and reserves is presented in Appendix 7.
- 9.2 Appendix 5, 'Addressing the Schools Budget in 2024/25', explains the position of the Gwynedd schools' budget.
- 9.3 In determining a budget, Cabinet and Council must consider the impact of their decisions in terms of equality, in line with the statutory duties placed on the Council through the Equality Act 2010. Appendix 8 deals specifically with the duty, including the statutory finance officer's comments on the whole Budget in terms of equality. The assessment confirms that there will be a positive overall impact from the continuity of services that are considered a priority for protection and funding to the additional level of demand, and it is not believed that any negative impacts will be significant.
- 9.4 The Council complies with the requirements of the Well-being of Future Generations (Wales) Act 2015 and the recommendations in the report are based and developed in accordance with the statutory duty on the Council under Section 3 to undertake sustainable development in all its activities. As usual, more detailed information about the Well-being Act and relevant conclusions is provided at Appendix 9.
- 9.5 The statutory finance officer must express a view on the robustness of the estimates. An appropriate risk assessment and confirmation is presented at Appendix 10.
-

Views of the local member

Not a local issue

Views of statutory officers

Monitoring Officer:

Although it is a matter for the full Council to make a final decision on the budget, it is important that the Cabinet gives them a clear recommendation regarding its expenditure plans and the draft budget, and this report achieves that. Once the Council has agreed on the financing sources, then the Cabinet will be responsible for the expenditure and the priorities within that budget.

Head of Finance:

I have worked with the Cabinet Member to prepare this report and confirm the contents. Having considered all the risks outlined in Appendix 10 to the report, and the mitigation, I consider that the Council's Budget for 2024/25 is robust, adequate, and achievable.

APPENDICES

- 1 Proposed Budgets
- 2 Summary of Bids
- 2a Permanent Revenue Bids
- 2b Capital Bids
- 3 Savings
- 4 Capital
- 5 Dealing with the Schools Budget in 2023/24
- 6 Council Tax
- 7 Balances
- 8 Assessing the Impact on Protected Characteristics, the Welsh Language and Socio-Economic Disadvantage
- 9 Well-being of Future Generations (Wales) Act 2015
- 10 Robustness of Estimates

APPENDIX 1 - BUDGET SUMMARY

PROPOSED BUDGETS BY SERVICE 2024/25										
	Base Budget 2023/24	Pay and Pension Inflation	Other Inflation	Demography	Grant Income Target Adjustment	Pressure on Services	Present Savings	New Savings	Various Adjustments	Base Budget 2024/25
DEPARTMENTS	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Central Education	18,584	1,335	(74)	0	(75)	896	(112)	(340)	649	20,863
Schools' Budget	86,597	7,626	1,795	(48)	(2,286)	0	(819)	0	(180)	92,685
Economy and Community	4,376	407	353	0	0	0	(66)	(152)	0	4,918
Adults, Health and Wellbeing	70,149	4,085	3,111	0	383	3,298	295	(246)	(134)	80,941
Children and Supporting Families	21,406	1,027	509	10	0	86	(157)	0	69	22,950
Highways, Engineering and YGC	16,174	1,283	(45)	0	0	155	(257)	(420)	(33)	16,857
Environment	17,145	947	492	0	0	116	(228)	(316)	33	18,189
Housing and Property	8,102	388	465	0	0	0	(129)	(131)	(23)	8,672
Corporate Management Team and Legal	2,661	120	22	0	0	0	0	0	(60)	2,743
Corporate Support	7,473	452	44	0	0	60	(46)	(197)	0	7,786
Finance	7,690	688	(124)	0	0	442	(208)	(163)	0	8,325
DEPARTMENTAL TOTAL	260,357	18,358	6,548	(38)	(1,978)	5,053	(1,727)	(1,965)	321	284,929
Corporate and Capital Matters	60,859	(884)	(2,379)	0	0	0	(1,386)	149	(2,843)	53,516
TOTAL GROSS	321,216	17,474	4,169	(38)	(1,978)	5,053	(3,113)	(1,816)	(2,522)	338,445
Less Community Council Precepts	(2,895)	0	0	0	0	0	0	0	0	(2,895)
TOTAL GROSS EXPENDITURE	318,321	17,474	4,169	(38)	(1,978)	5,053	(3,113)	(1,816)	(2,522)	335,550
Balances and Specific Reserves	(248)	0	0	0	0	0	0	(2,960)	(1,752)	(4,960)
NET EXPENDITURE TOTAL =	318,073	17,474	4,169	(38)	(1,978)	5,053	(3,113)	(4,776)	(4,274)	330,590
Financed By:-										
Grant	228,036									232,092
Council Tax	90,037									98,498
Total Income	318,073									330,590

APPENDIX 2 - SUMMARY OF BIDS

	Title of Bid	Permanent (£)	Capital (£)
Adults & Children's Department - Joint Bid			
Bid 1	Salaries of Social Workers and Occupational Therapists	184,280	
Adults, Health and Wellbeing Department			
Bid 2	Nursing Care Fees	601,060	
Bid 3	Transition into adult services for individuals with learning disabilities	67,850	
Bid 4	Mental Health Advanced Practitioners	119,160	
Bid 5	Home Care	500,000	
Bid 6	Mental Health	300,000	
Bid 7	Supported housing for individuals with disabilities	1,612,210	
Cap 9	Learning Disability Workshops		20,000
Finance Department			
Bid 8	Bank costs	156,900	
Bid 9	Digital Plan (CC2) - Improvements to the Council's Phone provision	239,000	
Bid 10	Digital Plan (GWYD2) - Service Continuity	46,000	
Corporate Support Department			
Bid 11	Wellbeing support for the Council's staff	60,000	
Cap 3	Register Repository		50,000
Education Department			
Bid 12	Re-tendering of School Buses	486,000	
Bid 13	School Taxis and Trains Transport	409,610	
Environment Department			
Bid 14	CCTV on Vehicles	13,680	
Bid 15	Waste and Recycling Service Structure	102,070	

Highways, Engineering and YGC Department

Bid 16	Evaluation of Jobs - Highways Maintenance Service	155,000
Cap 4	Cadnant River - Culvert Screen Upgrade	30,000
Cap 5	Bontnewydd Flood Alleviation Project	75,000
Cap 6	Continued Access Across the Estuary Strategy	50,000
Cap 7	Improvements to Ffordd Bala Depot	45,500
Cap 8	Afonwen Depot and Offices Upgrade	57,050

Economy and Community Department

Cap 1	Dinas Dinlle Car Park	50,000
Cap 2	Community Support Fund (Cist Gwynedd)	50,000

5,052,820	427,550

APPENDIX 2a - PERMANENT REVENUE BIDS

PERMANENT REVENUE BIDS 2024/25

	Title of Bid	Details of Bid	Recommended permanent sum (£)
ADULTS & CHILDREN'S DEPARTMENT - JOINT BID			
Bid 1	Salaries of Social Workers and Occupational Therapists	A bid to enable the Department to put in place a structure for the salaries of social workers and occupational therapists that is suitable for the future. A new, attractive structure to try to retain our professional and experienced staff and to attract the professional workers of the future. £86,250 for the Children's Department £98,030 for the Adults, Health and Wellbeing Department	184,280
ADULTS, HEALTH AND WELLBEING			
Bid 2	Nursing Care Fees	The Council's Cabinet decided to increase the Council's Nursing and Residential fees for 2022/23 in order to support the market and pay a fair price for private care. The fees that were agreed were higher than the rest of North Wales and they have continued to be higher than recommended by the Regional Fees Group for 2023/24. Gwynedd's standard fee for EMI Nursing is amongst the highest in Wales. Despite this, a number of the EMI Nursing Providers in Gwynedd refuse to accept the standard fees that have been set by the Council, and they claim substantially higher fees. Due to the shortage in provision, we do not have sufficient control of the market. We are looking at our options to develop more Nursing and EMI Nursing provision in Gwynedd - for example Penrhos nursing home, but it will be necessary to continue to pay higher fees in the meantime.	601,060
Bid 3	Transition into adult services for individuals with learning disabilities	A number of individuals who have been receiving the service of the Children and Families Department will turn 18 years old and will start to receive the Learning Disabilities Service in 2024/25. Two of these individuals have been identified as care packages that will have substantial additional costs for the Learning Disabilities Service. It will be necessary to meet the needs of the individuals and their carers in line with the needs assessment, in order to achieve specific wellbeing outcomes in line with the Social Services and Well-being (Wales) Act 2014. A higher number of children will be transferring to the Learning Disabilities Service during the coming year, but a number of the care packages will be met by the Department without additional resource. The bid is for the cases where there are substantial costs of care.	67,850
Bid 4	Mental Health Advanced Practitioners	This is a bid for a project to transform the Mental Health Service. The intention is to create two Lead Practitioner jobs (one in each area) in order to strengthen the capacity within the service. These jobs will enable the Area Leaders to operate more strategically, in order to lead the changes and to concentrate on building a relationship with our key partners, while the lead practitioners give operational leadership to the team and supervise the staff through a period of change.	119,160
Bid 5	Home Care	There is a pattern of historical overspend, with factors such as on-call arrangements (historical and unfunded), arrangements for the payment of travel time and the response to current work pressure contributing to the overspend. Consequently, the Department starts each financial year with a financial gap due to a lack of budget in these areas. An increase in the demand for service also contributes to making the situation more challenging. The additional resource would reduce the gap between the service's current provision costs and the budget, rather than being in a situation of annual inevitable overspend.	500,000

Bid 6	Mental Health	A pattern of historical overspend mainly related to an increase in the demand for service and the costs of cases where there was a need for specialist and expensive residential placements. The additional resource will allow for the available budget to match the current provision costs of the service, rather than being in a situation of annual inevitable overspend.	300,000
Bid 7	Supported housing for individuals with disabilities	The needs of individuals supported by the Learning Disabilities Team are getting more complex, with a higher number of individuals receiving support in Gwynedd. Many of these individuals and their families decide to live life as normal as possible and set up a home in their community in Gwynedd. As a result, the number of those living in supported housing in Gwynedd has increased. The additional resource will secure the provision of supported or specialist housing for individuals where it is necessary to find a housing option for them. Thorough support plans will be prepared as part of the support package.	1,612,210
FINANCE			
Bid 8	Bank costs	Following legislative change, the Council is no longer able to charge customers who pay with credit cards and therefore the Council's bank costs have increased substantially over recent years, as more payments for services by customers are paid by card. For some years, the Department has coped with the higher expenditure by underspend in other services. But following the recent savings/cuts plans, it is no longer possible for the Department to cope with the overspend.	156,900
Bid 9	Digital Plan (CC2) - Improvements to the Council's Phone provision	Establish a system that is fully integrated with Microsoft Teams and brings numerous improvements to the phone system, the contact centre's phone system and the ability to report confidently on our use of these media. It also has the ability to use multiple media, such as email, text and social media. The bid includes the costs of an additional officer responsible for the effective administration of the system. Contacting the Council by phone continues to be a popular choice among customers, and it is therefore important that we further develop this area.	239,000
Bid 10	Digital Plan (GWYD2) - Service Continuity	This bid is to strengthen our ability to protect from incidents such as cyber attacks and to improve our ability to recover if a cyber disaster or major incident were to disable our digital services.	46,000
CORPORATE SUPPORT			
Bid 11	Wellbeing support for the Council's staff	For several years there has been an overspend on the staff wellbeing budget. It refers specifically to the budget of the Counselling and Physiotherapy services that are provided for all the Council's staff. Over the years, the overspend has been met by an underspend within the Corporate Support Department. However, due to financial cuts, this is no longer sustainable.	60,000

EDUCATION			
Bid 12	Re-tendering of School Buses	The Transport Unit carried out a process of retendering Dwyfor Buses in March 2023. The process resulted in substantially higher costs. Furthermore, some contracts in Meirionnydd are subject to retendering in February / March 2024. A Transport Review Panel has been established to identify possible opportunities for efficiency, to try to manage the increase in expenditure. However, implementing a change in the bus contracts is difficult, especially in the short term.	486,000
Bid 13	School Taxis and Trains Transport	Overspend based on September 2023 contracts, associated with a deficit in the bid that was submitted for the 2023/24 financial year, along with real growth in the past 12 months, mainly on contracts for transport to Special Schools and Further Education transport contracts.	409,610
ENVIRONMENT			
Bid 14	CCTV on Vehicles	Monthly SIM costs for the cameras that will be installed on work vehicles. It is foreseen that these cameras will promote good health and safety behaviours among workers, reduce the risk to workers who work alone, improve safety around machines and collect evidence for investigation e.g. bins that are missed, damage to property or an accident.	13,680
Bid 15	Waste and Recycling Service Structure	Fund the changes made to the job evaluations when the service was part of the Highways and Municipal Department, as well as the changes made since the service was transferred.	102,070
HIGHWAYS, ENGINEERING AND YGC			
Bid 16	Evaluation of Jobs - Highways Maintenance Service	Following a review of the job descriptions of Road Workers, a review was completed before submitting the new job descriptions for evaluation. The result of the evaluation recognises changing the pay scale of two jobs. These changes will lead to an improvement in arrangements and the understanding of the team's responsibilities and duties.	155,000
TOTAL PERMANENT REVENUE BIDS			5,052,820

APPENDIX 2b - CAPITAL BIDS

CAPITAL BIDS 2024/25

	Title of Bid	Details of Bid	Recommended sum (£)
ECONOMY AND COMMUNITY			
Cap 1	Dinas Dinlle Car Park	A successful grant bid of £300,000 from the Welsh Government will be used to make improvements to the Dinas Dinlle car park. The Service has £95,000 match funding to finance the work, but a further £50,000 is needed to complete the work. The proposed improvements would ensure the car park is more accessible and safer.	50,000
Cap 2	Community Support Fund (Cist Gwynedd)	The Fund enables community and voluntary groups to start to plan projects, to complete small capital projects, or to co-finance big projects. The Fund received 64 applications in 2023/24, and it was only possible to finance 23 of the projects from the money that was available. The projects that were financed by the Fund in 2022/23 include restoring and reopening Llandderfel public toilets, developing Neuadd Ogwen, childcare hub in Frongoch, Y Bala, Penrhydeudraeth Football Club changing rooms, Menter Ty'n Llan, creative hub Nyth in Bangor and Llety Arall in Caernarfon.	50,000
CORPORATE SUPPORT			
Cap 3	Register Repository	In 2023, a General Register Office Compliance Officer visited the Council and gave a warning of non-compliance, that the present storeroom does not meet the minimum standards with regards to preventing fire / flooding. There is a proposed plan to ensure compliance with requirements with regards to storing information to do with births, deaths, marriages and ceremonies.	50,000
HIGHWAYS, ENGINEERING AND YGC			
Cap 4	Cadnant River - Culvert Screen Upgrade	As a result of a defect in the River Cadnant's culvert screen, up to 113 properties are at risk of flooding, with a substantial percentage of Caernarfon town also under threat from flooding, which runs beneath the town centre. A bid for 15% towards the project's costs, with the Welsh Government grant financing 85% of the cost. If the bid from the Welsh Government is successful, the aim is to start the work during the summer of 2024.	30,000

Cap 5	Bontnewydd Flood Alleviation Project	Up to 80 properties at risk of flooding. A bid for 15% towards the project's costs, with the Welsh Government grant financing 85% of the cost. If the bid from the Welsh Government is successful, the aim is to start the work during the summer of 2024.	75,000
Cap 6	Continued Access Across the Estuary Strategy	Damage along Y Foryd, Caernarfon has increased the risk of losing the road in the medium term. A strategy looking at a pilot scheme to complete a programme outlined in the Shoreline Management Plan 2. By assessing long term, sustainable options for maintaining access to properties, businesses and leisure and wellbeing facilities.	50,000
Cap 7	Improvements to Ffordd Bala Depot	A room for necessary training and team meetings for the Highways workforce at Ffordd Bala Depot, Dolgellau. Also for other improvements following an update to the Council's vehicle policy.	45,500
Cap 8	Afonwen Depot and Offices Upgrade	A bid to finance: 1) Heating system - the system needs to be upgraded to save energy and to be more cost-effective. 2) Machinery store extension - a dry place indoors is needed for storing two Phoenix machines. These are vehicles that resurface the roads. 3) Afonwen Offices Upgrade - upgrade the kitchen and furniture, renew desks, new door for the main entrance and adaptations to facilitate access, such as a ramp. 4) Stakrak System to store equipment in the yard - store goods such as pipes safely and create more space.	57,050
ADULTS, HEALTH AND WELLBEING			
Cap 9	Learning Disability Workshops	The Learning Disabilities Service workshops need substantial electrical and ventilation work in order to ensure the safety of workers and service users who use the machines or work within the rooms. The following are required: - Ventilation work in the workshops at Canolfan y Gwystl and Felin Glynllifon (5 machines). - Electrical work in the workshops at Canolfan y Gwystl and Felin Glynllifon. - Machinery training for relevant workers at Canolfan y Gwystl, Felin and Gweithdy Bach Glynllifon and Dolfeurig.	20,000
TOTAL CAPITAL BIDS			427,550

APPENDIX 3

SAVINGS

1. Cyngor Gwynedd has realised over £39.1m of savings schemes since 2015/16.
2. Once again this year as in previous years the grant from the Welsh Government was not sufficient to meet inflation, and as demands in various areas such as adult care, waste, transport, and homelessness are also increasing, we have been in a continuous cycle of having to find savings.
3. There is one savings scheme worth £15,000 from the Economy and Community Department which derives from previous savings programmes related to 2024/25. The scheme has already been approved by the Council, and is therefore not the subject of a decision this year. It has also followed a proper statutory process, see below for information.

Savings	Total £
Improvements at Neuadd Dwyfor to make it more efficient in preparing for the future	15,000

4. On 14 February 2023, the Cabinet approved £6.4m worth of savings for the 2023/24 budget onwards, which came into effect in line with the profile below, with £2,848,630 profiled for 2024/25.

SAVINGS SCHEMES PROFILE 2023/24 ONWARDS

	2023/24 £	2024/25 £	2025/26 £	Total £
Savings profile (non-schools)	3,097,370	2,848,630	450,000	6,396,000

5. In addition to these savings, schools were also required to contribute to the savings schemes. Appendix 5 deals specifically with school budgets, and it can be seen there that the implementation of savings and cuts on the schools is inevitable for 2024/25. The cut was capped to a maximum of 3% on an individual mainstream school, and no cuts were introduced on the special sector. This cut was implemented over two financial years, which coincides with a school's academic year. The total cut is £1.966m, £1.147m (7/12th) already implemented in 2023/24 and then a further £0.819m (5/12th) in 2024/25, as seen in the table below:

Schools (Sector)	2023/24 (7/12th) £	2024/25 (5/12th) £	Total £
Primary	541,600	386,900	928,500
Secondary	605,000	432,600	1,037,600
Special	0	0	0
Total	1,146,600	819,500	1,966,100

6. Due to the poor financial settlement and also the current economic climate and the high levels of inflation, it is inevitable that Local Authorities must continue to look at savings and cuts to help the financial situation. A separate report on the Cabinet programme includes a list of further proposed savings for implementation in 2024/25 – 2026/27 which is worth £5.2m, they will come into effect in accordance with the profile below:

NEW SAVINGS SCHEMES PROFILE 2024/25 ONWARDS

	2024/25 £	2025/26 £	2026/27 £	Total £
Savings profile	1,965,760	2,860,300	343,090	5,169,150

7. Therefore, in summary, it is recommended to implement the following savings in the 2024/25 budget:

	£
Previously approved savings	15,000
23/24 savings profiled to 24/25 (excluding schools)	2,848,630
23/24 school savings profiled to 24/25	819,500
24/25 new savings profiled to 24/25	1,965,760
TOTAL	5,648,890

APPENDIX 4

CAPITAL

1. Whilst local authority revenue budgets face constraints, capital budgets are also under pressure, and there are revenue implications for capital expenditure which is not funded by specific grants.
2. A proposed programme for schemes for the next three years is set out below:

CAPITAL PROGRAMME			
	2024/25 £'000	2025/26 £'000	2026/27 £'000
Council Asset Plan:			
Sustainable Communities for Learning Schemes	9,023	0	0
Housing Schemes	3,000	1,300	1,300
Penygroes Health and Care Hub	2,500	0	0
Adults' Homes / Centres	1,515	0	0
Highways, Bridges and Municipal	1,051	1,700	2,078
Coastal Flood Protection	793	0	0
Other Schemes	3,136	1,023	1,251
Capital Bids	2,123	500	500
Other Schemes:			
Housing Strategy – Council Tax Premium Fund	0	0	2,549
Housing Strategy – Buy to Let	0	0	2,880
<i>Schemes already Approved:</i>			
Shared Prosperity Fund Schemes	16,406	0	0
Levelling Up Fund Schemes	10,098	3,239	0
Housing Schemes / Strategy	14,940	5,430	0
Sustainable Communities for Learning Schemes	7,031	0	0
Property Schemes	3,254	0	0
Coastal Flood Protection	3,113	0	0
Departmental Vehicles	2,960	962	0
Industrial Units	1,424	0	0
Other	2,858	402	362
PROGRAMME TOTAL	85,225	14,556	10,920

3. We will be funding the programme as follows:

CAPITAL PROGRAMME FUNDING			
	2024/25 £'000	2025/26 £'000	2026/27 £'000
Supported Borrowing	4,057	4,057	4,057
Other Borrowing	11,329	3,242	3,242
Grants and Contributions	39,542	5,792	2,553
Capital Receipts	0	0	0
Departmental and Corporate Revenue	99	0	0
Capital Fund	12,286	41	0
Renewals and Other Funds	17,912	1,424	1,068
PROGRAMME FUNDING TOTAL	85,225	14,556	10,920

4. The asset strategy from 2019/20 was approved by the Council on 7 March 2019. The asset strategy is operational for the periods 2019/20 to 2028/29. It is incorporated as part of the Capital Programme.
5. A three year profile from 2019/20 was set by the Cabinet on 2 April 2019, with the subsequent years profiled in the capital programme from 2022/23 onwards.
6. The above table therefore reflects the general capital requirements (together with the funding) for setting the 2024/25 to 2026/27 budget, whilst the individual scheme details were established by the Council in the 10 year asset strategy, 2019/20 to 2028/29.
7. The 2024/25 Supported Borrowing and General Capital Grant figure in the financial settlement from Welsh Government is slightly lower than anticipated when the asset strategy was established. I have adjusted the programme accordingly.
8. Therefore, the Full Council is asked to establish a total programme worth £85,224,800 for 2024/25, to be funded from the sources noted in the table under part 3 above.

APPENDIX 5

DEALING WITH THE SCHOOLS' BUDGET IN 2024/25

1. **Background:** That there will be a normal increase in the Gwynedd schools' quantum this year, as the Council (unlike some local authorities) funds inflation, pay increments, and demography.
2. **Inflation:** The schools' budget will increase by **£9.4m** this year for inflationary increases, including teachers' pay and pension inflation. This will cover the cost of teachers' 6.5% pay increase for the 5 months April – August, which is the full year effect of the September 2023 pay agreement, and the cost of an estimated further increase of 3.5% for the September 2024 pay agreement (for the 7 months September 2024 – March 2025). The increase in non-teaching staff costs for April 2023 and an estimate of 5% for April 2024 is also included. Of course, schools' allocations for energy, including 150% for gas, will also increase with the level of related inflation.
3. **Teachers' Pension:** There will be a 5% increase in teachers' pension employer contribution rate from April 2024. A specific grant to fund the increase is expected from Welsh Government. No confirmation has been received as yet.
4. **Staff Pay Increments:** £547k will be added towards the Council's budget for 2024/25 to deal with increments and a reduction of -£188k for staff turnover.
5. **Demography (pupil numbers):** The schools' budget will reduce this year due to the usual "demography" adjustments, resulting from changes in pupil numbers. The actual number of pupils in September 2023 will be used to calculate 2024/25 allocations. The situation differs from school to school, but overall, the impact of decreasing pupil numbers means that the schools' budget as a whole would reduce -£48k, which includes a reduction of -£474k for the Primary sector, and an increase of +£167k for the Secondary sector and +£259k for the Special sector. Individual schools will expect an increase / decrease in their allocations proportionate to the change in pupil numbers in the schools.
6. **Savings and Cuts 2023/24 and 2024/25:** The Council had endeavoured to protect schools' budgets since 2015/16, with 13% of savings harvested from schools which represent 30% of the Council's net expenditure. However, by 2023/24, it was inevitable that schools would have to implement savings and cuts. The Full Council decided on 2 March 2023, when setting the 2023/24 budget, to cap a maximum 3%.

cut on an individual mainstream school with no cuts for the special sector. Also, it was decided that the cut will be applied over two financial years, which coincides with a school's academic year. The total cut was £1.966m and was apportioned to £1.147m (7/12ths) in 2023/24 and then £0.819m (5/12ths) in 2024/25.

7. **Education Specific Grants:** It appears that specific grants from Welsh Government will continue in Education in 2024/25 at a similar level to 2023/24, but it is expected that work will be carried out to combine some grants in Education.
8. **Overall Conclusion:** Having taken all the above factors into account, the schools' budget will be higher in 2024/25 than in 2023/24. Furthermore, it is recommended that permanent bids are approved in Education, specifically in the schools' transport field. More details can be found in Appendix 2.

APPENDIX 6

COUNCIL TAX

1. It is a key decision for Full Council members to make, in light of the considerations presented in this report, to establish the exact level of Council Tax increase for 2024/25. The key to this is achieving an appropriate balance between the need to spend on services for the most vulnerable in our society, and the tax increase that is suitable to be levied on the residents of Gwynedd.
2. In the historical assumptions made in our medium-term financial strategy, we used a figure of 3.5% as an estimate of the average increase in Wales. However, the level that has had to be raised has varied annually, largely to reflect the gap that existed as a result of the Welsh Government grant settlement.
3. The increase seen in Cyngor Gwynedd Tax, and the average increase across Wales, since 2016/17 is set out below:

Year	Cyngor Gwynedd	Wales
2023/24	4.95%	5.5%
2022/23	2.95%	2.2%
2021/22	3.7%	3.6%
2020/21	3.9%	4.6%
2019/20	5.8%	6.2%
2018/19	4.8%	4.9%
2017/18	2.8%	3.0%
2016/17	4.0%	3.6%

In 2023/24 Cyngor Gwynedd's Band D Council Tax level was £1,603 while the average tax level for Welsh counties was £1,512.

More information is found in this document: [Council Tax Levels in Wales: 2023-24 \(gov.wales\)](#)

4. This year, it is recommended that the tax be raised by 9.54% for 2024/25. That would generate £98m of tax (compared to £90m in 2023/24), which includes £9m of Premium yield. That would equate to a Council Tax increase of £152.89 for a Band D property, or £2.94 a week. The tax charged by the Police and Crime Commissioner (an increase of 5.14% for 2024/25) and the community councils (% variable) will of course be in addition to this.
5. Over 8,100 homes in Gwynedd receive some element of support towards their Council Tax through the Council Tax Reduction Scheme, and over 60% of Gwynedd properties

are in bands below band D. In addition, there are a wide range of statutory exemptions and discounts available, which are related to the status of the property.

6. We do not yet know exactly what the average increase will be across Wales in 2024/25, but the latest information is that there will be quite a wide range across Wales. The proposal to raise the tax by 9.54% is consistent with the situation across north Wales. Every additional 1% tax would adjust the financial gap we would need to find by around £899,200. Therefore, 3.5% would mean adjusting the financial gap by approximately £3,029,400 whilst 5% would involve adjusting the financial gap by approximately £4,378,190.
7. The choice between maintaining services and taxation remains a difficult one, of course, and it is up to all members to take stock and arrive at the balance that they consider appropriate. However, further to several informal conversations at the members' workshops, **a Council Tax increase of 9.54% is recommended, which would be a weekly increase of £2.94 or £152.89 annually, with a Band D tax of £1,755.47 for 2024/25.**

COUNCIL TAX PREMIUM PRODUCTS ON EMPTY PROPERTIES AND SECOND HOMES

8. At the Full Council meeting on 7 December 2023, it was decided to continue with the 100% premium on properties that have been empty for 12 months or more for 2024/25 and to continue with the premium of 150% on second homes. It is estimated that the Council will receive £9m of additional income in 2024/25 from the premium. £6m of the money has been allocated to a fund to implement the Housing Action Plan, which will aim to provide housing for young people in our communities, and £3m to the homelessness budget.
9. All income must be incorporated and related expenditure met in the 2024/25 budget.

APPENDIX 7

BALANCES

1. Local authorities need a prudent level of 'working capital' to maintain adequate cash flow and meet unforeseen expenditure. It is projected that the Council will have general balances of about £7.9m at the end of this financial year, representing around 1.5% of the Council's gross revenue expenditure.
2. We have noted, on more than one occasion, that due to the turbulent circumstances we will be facing in the years ahead, it is appropriate to keep sums in reserve in order to deal with problems that could arise.
3. Nothing has happened in the meantime to change this opinion, as the continuous increase in demand for care services, homelessness and waste means that the risk continues. Therefore, the need to ensure that we have appropriate balances to deal with any financial shock is still relevant.
4. **The Council has a number of specific reserves** established to meet specific expenditure needs. These are also part of the Council's budget, of course, and have been scrutinised annually. Attention was given to the specific reserves by the Governance and Audit Committee on 25 May 2023 and the Cabinet on 13 June 2023, when it was approved to transfer £3.918 million from reserves to be used in its entirety to assist the departments that had overspent in 2022/23. I review the level of these reserves continually, and **the intention is to conduct another review by May 2024**, to consider how much scope there will be for the Council to change its priorities within these reserves.
5. During 2024/25 there is an intention to use almost £5m from the 'Financial Strategy Fund' to bridge the budget and the savings that have been identified but will not be achieved until 2025/26. This fund has been established specifically to deal with such eventualities as they arise.
6. In their report "Meeting the Financial Challenges facing Local Authorities in Wales" (2014), the **Wales Audit stated** (in paragraph 1.8):

*"Councils can use reserves to help them to balance their budgets where savings plans do not achieve the expected results or where income is less than anticipated. However, **financing recurrent expenditure from reserves would not normally be appropriate**. A prudent level of useable reserves is a key element of financial stability; the minimum appropriate level will vary dependent on an authority's known and potential liabilities and its spending plans. There are signs that a few councils are over-relying on general reserves to deal with budget shortfalls, rather*

than seeking more sustainable approaches, which often involve making unpopular decisions.”

7. This message was reinforced by Audit Wales, which reported in October 2020 on the financial sustainability of Welsh local authorities as a result of the Covid-19 pandemic. While Gwynedd Council's usable reserves are in the upper quartile of the range of Welsh local authorities (in terms of the size of their usable reserves), **Audit Wales' opinion is that:**

*“(9) some councils were much better placed than others to weather a financial challenge such as the pandemic. This is most clearly illustrated by the varying levels of usable revenue reserves held by councils” and (18) **that “the level of usable reserves available to a council is one of the key indicators of financial resilience and sustainability”.***

A copy of the report can be found here:

[Financial Sustainability of Local Government as a Result of the COVID-19 Pandemic \(wao.gov.uk\)](https://wao.gov.uk/financial-sustainability-of-local-government-as-a-result-of-the-covid-19-pandemic)

8. I am convinced that the Council's use of balances is a totally appropriate action.
9. The Council's balances has been a key instrument. As the Council will have balances of about £7.9 million, we will have kept the bulk of the balances in reserve again, so they are available to 'bridge' the financial position if required.

APPENDIX 8

Assessing the Impact on Protected Characteristics, the Welsh Language and Socio-Economic Disadvantage

For help to complete this form see the *How to Undertake an Equality Impact Assessment* leaflet. You are also welcome to contact Delyth Gadlys Williams, Policy and Equality Officer on ext. 32708 or DelythGadlysWilliams@gwynedd.llyw.cymru for further assistance.

The Council is required (under the Equality Act 2010) to consider the effect any change in policy or procedure (or the creation of a new policy or procedure), has on people with protected equality characteristics. The Council also has a general duty to ensure fairness and foster good relations. A timely Equality Impact Assessment must be undertaken before making any decision on any relevant change (i.e. which has an effect on people with protected characteristics).

The Council is also required, under the requirements of the Welsh Language Standards (Section 44 of the Welsh Language (Wales) Measure 2011) to consider the effect of a change in any policy or procedure (or the creation of a new policy or procedure), in its opportunities for people to use Welsh and to ensure that Welsh is not treated less favourably than English. This document therefore ensures that these decisions protect and promote the use of the Welsh language.

From April 1st 2021 the Council has a duty to have due regard to tackling socio-economic disadvantage in strategic decisions.

1) Details

1.1. What is the name of the policy / service in question?

The Council's Budget for 2024/25.

1.2 What is the purpose of the policy / service that is being created or amended? What changes are being considered?

Setting an annual budget is a statutory requirement for the Council, as well as being a key step in maintaining good financial stewardship.

1.3 Who is responsible for this assessment?

Dewi Morgan, Head of Finance.

1.4 When did you commence the assessment? Which version is this?

March 2023, when considering the Council's financial outlook for the years 2024/25 and 2025/26 immediately following the setting of the 2023/24 Budget. At that time, it was expected that it would be possible to set balanced budgets in these two years without finding further savings.

However, the ongoing work to consider the impact of inflation, the 2023/24 pay settlement etc has crystallised the Council's position with regards to identifying the impact of the decisions that will have to be taken as we ensure that we set a balanced budget.

Detailed work commenced on 20 December 2023, the date of the announcement of the provisional local government revenue and capital settlement: 2024 to 2025.

The provisional settlement has shown that the Council will have to continue to seek financial savings for 2024/25 and 2025/26 if we are to set a balanced budget. Each of the individual savings' schemes has been subject to an equality impact assessment.

2) Action

2.1 Who are the stakeholders or partners you need to work with to undertake this assessment?

A number of actions have been taken when preparing this budget:

- Discussions between service accountants and senior officers in the departments to consider bids and savings plans.
- All Council members invited to a budget seminar on 16 January 2024.
- Close collaboration between the Chief Executive, Corporate Directors, and finance officers in the consideration of bids.
- Cabinet Members have had the opportunity to express their views on the assessment of bids.
- Governance and Audit Committee has the opportunity to scrutinise the budget on 8 February.
- Cabinet to consider the draft budget on 20 February and make a recommendation to the Full Council.
- Full Council to set budget for 2024/25 and set Council Tax rate on 7 March.

2.2 What measures have you taken to engage with people with equality characteristics, regarding the Welsh language or with communities (either of place or of need) that live with socio-economic disadvantage?

The budget outlined here seeks to continue to provide appropriate outcomes for all residents of the county. The increase in Government funding this year is not sufficient to meet demand for services as well as inflation, therefore in order to set a balanced budget there is a need to look for further financial savings.

Every savings plan that is now in the programme for implementation has been subject to an Equality Impact Assessment at the time it was introduced. It is recognized that there is potential for an impact that would disproportionately affect those with protected characteristics, but the departments that own the savings have proposed efficiency savings plans rather than cuts. In addition, the individual savings plans have been subject to appropriate impact assessments that support the financial decisions presented here.

As the need to introduce savings schemes became clear during the financial year, and the true situation did not become clear until December 2023, time has not permitted a consultation process.

2.3 What was the result of the engagement?

There has not been a consultation process.

2.4 On the basis of what other evidence are you operating?

The 2024/25 budget is framed on an "incremental" principle. That is, the 2023/24 budget will be used as a base budget, making a number of adjustments before arriving at a draft budget for 2024/25:

- Staff Pay Inflation
- Other Inflation (suppliers)
- Increase in levies (Fire and Rescue Authority and Natural Resources Wales)
- Adjustments to reflect changes in demography
- Financial bids to address service pressures
- Technical adjustments to the budget
- Increase or decrease in borrowing and interest costs on balances
- Realising savings that have already been agreed
- Additional savings that must be introduced

All of the financial bids and savings plans have been subject to equality impact assessments themselves.

In planning our budgets for the continuity of Council services, our accountants have taken account of equality at all levels, using data and evidence on demographics and trends when planning at a strategic level. Similarly (but more specifically) in reaching a decision on individual savings plans, the heads of Council departments have analysed the impact of plans on services and monitored the impact appropriately.

As well as meeting inflationary pressures, all services have the right to submit a request for resource if they consider that an additional budget is needed to ensure that services continue. The amounts shown under the heading "pressures on services" recognize that the Council provides adequate funding to ensure that our financial arrangements do not adversely affect the level of services provided. Full details can be found in Appendix 2 and shows that a significant part of the total permanent revenue bids go to social care.

2.5 Are there any gaps in the evidence that needs to be collected?

No

3) Identifying the Impact

3.1 The Council must give due regard to the effect any changes will have on people with the equality characteristics noted below. What impact will the new policy/service or the proposed changes in the policy or service have on people with these characteristics?

Characteristics	What type of impact?*	In what way? What is the evidence?
Race (including nationality)	Positive	The fundamentals of our budget, and the system that leads up to it, is to have a positive impact on the lives of the people of Gwynedd.
Disability	Positive	The bidding procedure detailed in Appendix 2 includes additional expenditure on social services and delaying or eliminating savings in this area.
Sex	Positive	The fundamentals of our budget, and the system that leads up to it, is to have a positive impact on the lives of the people of Gwynedd.
Age	Positive	The recommended budget includes a significant increase in the budget of the Adults, Health and Well-being Department.
Sexual orientation	Positive	The fundamentals of our budget, and the system that leads up to it, is to have a positive impact on the lives of the people of Gwynedd.
Religion or belief (or non-belief)	Positive	The fundamentals of our budget, and the system that leads up to it, is to have a positive impact on the lives of the people of Gwynedd.
Gender reassignment	Positive	The fundamentals of our budget, and the system that leads up to it, is to have a positive impact on the lives of the people of Gwynedd.
Pregnancy and maternity	Positive	The fundamentals of our budget, and the system that leads up to it, is to have a positive impact on the lives of the people of Gwynedd.
Marriage and civil partnership	Positive	The fundamentals of our budget, and the system that leads up to it, is to have a positive impact on the lives of the people of Gwynedd.

The Welsh language	Positive	The Council's budget includes ensuring that resources have been put in place to support fully bilingual services. The Council's Corporate Plan is the Council's main policy document and includes a number of schemes that promote the Welsh language. The budget is being drawn up to implement that policy. In drawing up the budget, particular attention was given to the Well-being of Future Generations Act, including the seven well-being goals. That includes addressing the sixth aim, 'Culture and the Welsh Language'.
Socio-Economic Disadvantage	Positive	The nature of the Council's services means that the pressures on services address socio-economic inequality since the measures recommended to deal with pressures on services take this into account. The Council's budgets, and in particular the successful bids, are designed to ensure that the authority can continue to direct resources to reduce discrimination on the grounds of socio-economic disadvantage. Any increase in the Council Tax rate is a financial pressure on the people of Gwynedd, but over 8,100 receive some support towards their Council Tax through the Council Tax Reduction Scheme. Elected members will come to a decision on the appropriate balance to be found between council tax increases and the need to provide services to the people of Gwynedd.

- 3.2 The Council has a duty under the 2010 Equality Act to contribute positively to a fairer society by promoting equality and good relations in its activities regarding the following characteristics – age, gender, sexual orientation, religion, race, gender reassignment, disability and pregnancy and maternity. The Council must give due attention to the way any change affects these duties.**

General Duties of the Equality Act	Does it have an impact?*	In what way? What is the evidence?
Abolishing illegal discrimination, harassment and victimisation	No	It is believed that none of the effects mentioned in 3.1 will lead to discrimination, harassment, or victimisation.
Promoting equal opportunities	Positive	Setting the budget is based on considerable work over a number of years of ensuring that a budget is in place that reflects the needs and requirements of the people of Gwynedd.
Encouraging good relationships	Neutral	The budget is set within clear boundaries, and the balance of successful bids and savings responds to the real pressures on services.

3.3 How does your proposal ensure that you work in accordance with the requirements of the Welsh Language Standards (Welsh Language (Wales) Measure 2011), to ensure that the Welsh language is not treated less favourably than English and that you seize every opportunity to promote the Welsh language (beyond providing services bilingually) and increase opportunities to use and learn the language in the community?

The Council's Plan is the Council's main policy document and includes a number of schemes that promote the Welsh language. The Cyngor Gwynedd Plan for 2023-28 was adopted by the Full Council on 2 March 2023. The budget is being drawn up to implement that policy.

This year, in drawing up the 2024/25 Budget, the Council had to identify new savings plans, as well as consider the practicality of savings that had previously been identified as savings to be removed from departmental budgets and had already been approved in previous years. The statutory processes included the completion of an equality assessment which includes a question about impact on the Welsh language. When decisions about savings were discussed in the 2020/21 Budget report, it was concluded that **no impact** had been identified on the Welsh language but that there is a need to monitor this on implementation.

When preparing the Budget reports for 2021/2022, 2022/23 and 2023/24, consideration was given to the intended impact of these budgets on the Welsh language. In line with practice an equality assessment has been completed which includes a question about the impact on the Welsh language. This procedure continues for 2024/25.

3.4 What other measures or changes could you include to strengthen or change the policy / practice in order to have a positive impact on people's opportunities to use the Welsh language, and to reduce or prevent any adverse effects that the policy / practice may have on the Welsh language?

This is a financial policy, and we believe that the current policy achieves the best of our legal and statutory capacity in that regard in terms of having a positive impact on the language.

3.5 How does the proposal show that you have had due regard to the need to address inequality caused by socio-economic disadvantage? (Note that this is about closing inequality gaps rather than just improving outcomes for everyone)?

The establishment of the Council's budget is the result of specific actions that take account of the previous year's base budget and the steps that then need to be taken to reflect adjustments that need to be considered to deal with budget pressures for the following year. In addition, the budgetary position of all Council services is subject to detailed review three times a year, to identify any areas where action is needed to deal with underspends or overspends – particularly if budgets are not sufficient to deal with pressures on services. The nature of the Council's services means that the pressures on services reduce socio-economic inequality as the measures to deal with pressures on services take this into account.

There is a need to present savings plans this year in addition to those that exist in the programme from previous years. All have been subject to a detailed assessment to ensure that inequality due to socio-economic disadvantage is reduced.

Some of the bids recommended to be funded include several specifically designed to reduce inequality caused by socio-economic disadvantage. These are detailed in Appendix 2.

3.6 What other measures or changes might you include to strengthen or change the policy / practice to show that you have had due regard to the need to reduce disproportionate outcomes as a result of socio-economic disadvantage, in accordance with the Socio-Economic Act?

The requests for additional expenditure to deal with service pressures ("bids") have been the subject of detailed assessments by a number of officers and members and we are therefore confident that all steps that are practically possible to reduce socio-economic disadvantage in drawing up the budget have been taken.

4) Analysing the Results

4.1 Is the policy therefore likely to have a significant, positive impact on any of the above and what is the reason for this?

There will be an overall positive impact from the continuation of services that were seen as priorities to be protected and funded to meet the additional level of demand.

4.2 Is the policy therefore likely to have a significant, negative impact on any of the above and what is the reason for this?

Any increase in Council Tax will have an impact on the financial position of the people of Gwynedd, and a higher increase than usual is recommended this year, which is necessary to ensure that the Council's financial position remains sustainable for the future.

4.3 What should be done?

Choose one of the following:

Continue with the policy / service as it is robust	✓
Adapt the policy to delete any barriers	
Suspend and delete the policy as the detrimental impacts are too big	
Continue with the policy as any detrimental impact can be justified	
No further action at this time because it is too soon to decide, or there is insufficient evidence	

4.4 If continuing with the project, what steps will you take to reduce or mitigate any negative impacts?

Departments will work to ensure that they mitigate any negative impacts.

4.5 If you are not taking any further action to delete or reduce the negative impacts, explain why here.

Elected members will come to a decision on the appropriate balance to be found between council tax increases and the need to provide services for the people of Gwynedd.

5) Monitoring

5.1 What steps will you take to monitor the impact and effectiveness of the policy or service (action plan)?

It will be necessary for the Full Council to decide annually on the setting of the budget and tax rate.

The savings will be challenged at the Performance Challenge Meetings three times a year and reported to Cabinet as part of individual Cabinet Members' performance reports. In addition, a Savings Overview report will be presented to Cabinet and to the Governance and Audit Committee three times a year.

APPENDIX 9

WELL-BEING OF FUTURE GENERATIONS (WALES) ACT 2015

1. The work of planning and preparing the recommendations has taken place in the context of the above Act's requirements. Although the recommendations derive from difficult financial choices, the Council has acted on the basis of the principle of acting in a way that addresses the statutory duty in Section 3 to undertake sustainable development and achieve the Council's Well-being Objectives. This is addressed by identifying and evaluating options for savings, but also by making decisions and choices from the perspective of providing sufficient resources in order to support an appropriate level of services.
2. This budget reflects the following five ways of working the Council is required to consider when applying sustainable development.
 - Looking to the long term - The budget plans for the future, by identifying the needs and demand for services not only in 2024/25, but in the future, and takes a strategic approach to ensure services are sustainable.
 - Understanding issues and preventing them – The budget process facilitates an understanding of the financial position, so that issues can be tackled at the source. Also, the series of Members' Workshops have aided an understanding of the financial strategy.
 - Taking an integrated approach – Cyngor Gwynedd's policies and budgeting practices, and this year's budget proposals, have been considered from the perspective of all well-being goals.
 - Working in a collaborative way – Where better services can be provided by collaboration and working with partners, the budget process and savings strategy encourages this, internally and externally, where that is more sustainable.
 - Including the population in decisions – Part of the budget process included engagement with residents, customers, and partners.
3. Main conclusions for the 2024/25 budget regarding the 7 well-being goals:
 - Prosperous – Neutral (add to the resources of services that put an end to poverty)
 - Resilient - Positive (prudential long-term approach to funding services and enable the Council's Plan)
 - Healthier – Positive (funding additional 'care' service requirements)
 - More Equal - Positive (taxing in order to fund 'welfare' services)
 - Cohesive Communities – Neutral (continue to fund services that protect people)
 - Culture and Language – Positive (by funding bilingual services)
 - Globally Responsible – Neutral (continue to fund digital, environmental, and cooperative projects)

4. Regarding specific financial savings schemes, as part of the corporate and departmental savings regime in previous years when the savings schemes were approved, where appropriate there was a specific well-being assessment for each individual scheme. New savings and cuts schemes that are introduced in this budget ensure that a balanced budget can be set that protects future resources.
5. Generally, coupled with the Council's Plan and Well-being Objectives, this budget supports the Council to realise strategic objectives

APPENDIX 10

ROBUSTNESS OF ESTIMATES

1. In accordance with Section 25 of the Local Government Act 2003, the Chief Finance Officer is required to report on the robustness of the budget estimates and the adequacy of the proposed reserves. Appendix 7 outlines the position of the balances and reserves, while this appendix confirms the robustness of the budgetary estimates underpinning the budget.
2. The budget estimates are based on assumptions about future expenditure and income and inevitably include an element of risk from assumptions. The impact of this risk can be mitigated through contingency plans, contingency budgets, and financial reserves.
3. There are several key elements in the budget that are based on estimates. Specific attention is given below to those which pose the greatest risks:
4. **Inflationary Risk** - Overall inflation has fallen in the second half of the 2023/24 financial year from the exceptionally high levels seen during 2022/23. Independent forecasts received show that inflation rates are expected to fall further during 2024/25 but will remain above the Bank of England's 2% target. We believe that general inflation will remain around 3% on average during the year. This budget including the forecast of the pay agreement reflects the latest forecasts. I am satisfied that prudential estimates of inflation levels have been included.
5. **Interest Rate Risk** - Interest rates can affect the revenue budget through the interest earned - i.e. an interest rate increase would mean more income. In line with the Council's Investment Strategy (in a subsequent item on the programme of this meeting), the budget does not depend on excessive returns. In 2021 interest rates remained at record lows, but have risen since then. However, interest rates are expected to start falling gradually during the second half of the 2024/25 financial year as inflation levels continue to fall. Therefore, interest rate risk is considered low and would compensate for the inflation risk, as one is likely to increase and decrease with the other.

6. **Specific Grant Risks** – There are risks which relate to the large number of specific grants from the Welsh Government and others that support a proportion of the Council's expenditure. We have received significant specific grants in social care in recent financial years, with associated commitments, which make financial planning difficult. In general, the associated expenditure will have to end when a grant ends, but the terms of a contract may mean that expenditure cannot be cut as quickly as the grant, or that redundancy costs are to be funded. Furthermore, funded activity may be so important to the delivery of the Council's own priorities, that the Council decides to continue with the expenditure.

Local authorities have supported putting pressure on the Welsh Government to bring as many grants as possible into the overall settlement. A limited number of grants will transfer during 2024/25.

7. **Income Risks** - The budget is based on securing a specific increase in fee income equivalent to the increase in relevant costs. If demand for Council services falls, and income targets are not met, this can lead to an overspend on departmental budgets. The actual budget position will need to be monitored closely during the year and, if necessary, expenditure will need to be cut back to match the reduction in income. That will not be possible with some large corporate budgets, where income estimates must be set at a prudent level.

I believe there is a higher than normal risk in 2024/25 from the perspective of income as a number of the proposed savings schemes are tied to increasing income, including some schemes that have slipped from 2023/24.

9. **Risk with Savings** – In order to be able to set a balanced budget, the 2024/25 budget includes £3.7m of 2023/24 savings profiled to be realised in 2024/25 (which includes £820k schools' savings), £15k historic savings (i.e. programmed before 2023/24), as well as £2m new savings. However, some Council departments have a history of failing to deliver on their savings plans and that presents a significant risk to long-term financial sustainability. I believe this is the biggest risk in setting this budget. In line with the usual procedure, we will mitigate the risk by ensuring savings schemes are in the ownership of departments and Cabinet members, and regularly monitoring the relevant progress. The budget also includes a strategy of providing 10% of the value of new savings schemes over the lifespan of the programme to deal with situations where savings schemes slip.

10. **Staff Redundancy Costs** - Some services restructure their staff to achieve savings, and staff are made redundant. Where appropriate redundancy costs will be funded from a central reserve, and a suitable amount has been set aside to this end, which mitigates the risk.

11. **Council Tax Premium** - In determining the taxbase, the number of second homes and empty homes to be included in the figures was assessed prudently. There is a risk that the number of properties that will pay have been over-estimated and that the income collected is lower than the estimated amount (due to property ceasing to be subject to the premium). We are managing the risk by employing inspectors who are checking the facts, and by not committing all potential tax products from the Premium before the situation becomes clearer.
12. **Statutory Finance Officer's Opinion** - Having considered all the risks identified above and the mitigation steps, the Head of Finance (Section 151 Officer) considers that the budgets are robust, adequate, and achievable.

CYNGOR GWYNEDD CABINET



Report for a meeting of Cyngor Gwynedd Cabinet

Date of meeting: 20 February 2024

Cabinet Member: Councillor Dyfrig Siencyn and Councillor Nia Jeffreys

Contact Officer: Sioned Williams

Contact Number: 01286 679547

Subject: CHALLENGE PERFORMANCE REPORT - CABINET MEMBERS FOR ECONOMY AND COMMUNITY

THE DECISION SOUGHT

To accept and note the information in the report.

THE REASONS WHY A DECISION IS NEEDED

In order to ensure effective performance management

1. INTRODUCTION

- 1.1 The purpose of this report is to update our fellow members on developments in the fields within our remit as Cabinet Members for Economy and Community. This will include outlining the latest developments against pledges within the 2023-28 Cyngor Gwynedd Plan; the progress of performance measures; and the latest on the savings and cuts plans.

2. PROJECTS OF THE CYNGOR GWYNEDD PLAN 2023-2028 (Improvement Priorities)

- 2.1 The table in APPENDIX 1 gives an update on the progress of the three priority projects in the Cyngor Gwynedd Plan 2023-28 under the section **A Prosperous Gwynedd - Strengthening the economy and supporting the people of Gwynedd to earn a worthy wage:**
- **Regenerating communities and town centres**
 - **Creating the best possible circumstances in Gwynedd for businesses and community enterprises to thrive, and support the people of Gwynedd into work**
 - **Promoting our culture and a sustainable visitor economy**
- 2.2 From this information, you will note that the Department has made good progress against the main milestones of the three projects in the first year of the Plan, 2023/24.
- 2.3 We would like to draw attention in particular to the grants that Cyngor Gwynedd has offered businesses across Gwynedd which are referred to in the second project. Through the ARFOR Programme (the Enterprising Communities scheme), the Welsh Government's Transforming

Town Centres Fund and the UK Government's Shared Prosperity Fund (SPF), a package of different funds was established to help businesses recover, develop and improve town centre properties. There was a significant response to the opportunity with 220 applications being submitted in recent months. The applications were worth £13.26 million but only £3.46 million was available in the budget. The small business grants had to be closed earlier than expected due to the response and the Property Improvement Fund and Large Business Grants applications had to be assessed to identify the strongest applications. The result is that 83 businesses have received the offer of a grant to date, worth £3.22 million. The remaining £154 thousand will be committed in the coming weeks.

- 2.4 We will contact those businesses that were unsuccessful to offer feedback and further advice. We will also aim to direct any underspend over the coming months to the fund in order to be able to support more businesses.
- 2.5 There was a report to the Education and Economy Scrutiny Committee on 26 January on the progress and the obvious risks to the project which are listed in Appendix 1 were discussed. Along with the high demand, the unreasonably short time-frame to implement the funding programmes is preventing efforts to support areas and sectors that are unable to respond immediately. There is also significant uncertainty about the size and administration of any funds after March 2025, which hinders our ability to plan for the future.

3. PERFORMANCE OF DEPARTMENT SERVICES

- 3.1 The Department's Performance Dashboard is reviewed regularly. There was an opportunity to scrutinise the performance of the various services at a special meeting on 24 January 2024 and we would like to draw the attention of Cabinet Members to the following matters:

Leisure Resources Service - Byw'n Iach, Padarn and Glynllifon Country Parks

- 3.2 It was reported last time on the recovery of Cwmni Byw'n Iach in providing services. We are pleased to report that the recovery continues with the total cumulative visits up to the end of December 2023/24 at 707,136, which is an improvement of 95,474 on 2022/23, although 154,224 lower than 2019/20 (pre-COVID). For the first time since re-opening following the COVID period, monthly visits for December 2023 are higher than the number of visits for December 2019. The company ran new campaigns which may have contributed to the increase in numbers and will continue with campaigns throughout January 2024.
- 3.3 We continue to see the numbers attending swimming and fitness lessons increasing with the numbers attending swimming lessons performing better than pre-COVID:
 - The total cumulative swimming lessons up to the end of December 2023/24 was 29,214. This is an improvement of 2,268 on 2022/23 which is an improvement of 3,940 on 2019/20 (pre-COVID).
 - Fitness Direct Debit was up to 3,319 up to the end of December 2023 which is 576 higher than November 2022/23 but 171 lower than November 2019/20 (pre-COVID).
- 3.4 Despite this increase, the school visits' cumulative income to the end of December 2023/24 was 11.7% less compared to the income for 2019/20 (pre-COVID). This reduction in school visits generates concern that some children in Gwynedd will not reach an adequate standard of

swimming. Cwmni Byw'n Iach has collaborated with the Education Department to find out what the obstacles are and it appears that the cost of transport to the centres is the biggest obstacle.

- 3.5 Over recent months, the architects have been preparing to submit planning applications for developments at Parc Padarn as part of the Llewyrch o'r Llechi Levelling Up Fund (LUF) application. The improvements include a new toilet block, restoration work on the Hafod Owen building, the A incline, Vivian Quarry structures and the Fire Queen shed. Plans are also being drawn up to redesign the car park.
- 3.6 There was an incredibly busy weekend at the Glynllifon Christmas fair in November, but it will be necessary to discuss better parking arrangements for the future with the organiser so as to avoid the repetition of traffic problems.

Maritime Services, Hafan Pwllheli and Victoria Dock, Caernarfon.

Maritime - Beaches

- 3.7 It is worth noting that 90% of the respondents to the Gwynedd beaches customer satisfaction survey considered their experience of our beaches to be 'Very Good' (65%) or 'Good' (25%); an increase of 15% compared to the previous quarter. Many said the beaches were beautiful, clean and safe, but concerns were recorded about overnight parking on beaches or in nearby car parks. The Service is receiving legal advice on the options available and hopes to learn from the Arosfan pilot scheme to see whether there is an opportunity to take advantage of the situation.
- 3.8 We would like to update the Cabinet on the work of upgrading the car park at Dinas Dinlle beach. You may recall that the plan secured a grant of £300k from the Welsh Government's Brilliant Basics Fund. The main aim of the plan is to upgrade the condition and environmental quality of the car park and the associated facilities and introduce new management arrangements. The plan includes resurfacing the car park with an appropriate material (grasscrete) which will include specific parking spaces, building a bus shelter, improving picnic areas and seating areas, repairing peripheral walls, renovating railings and landscaping. The work has started since November 2023 and it is anticipated that all the work will be completed on schedule by the end of March 2024.

Maritime - Harbours

- 3.9 A 4% increase was seen in the number of customers with a mooring agreement in our harbours this year compared to the previous year, and the outlook for 2024 is very encouraging with a number of enquiries received over recent months from new customers who want to moor their boats in the harbours of Gwynedd. The work of inspecting and renovating the main mooring chains in Porthmadog harbour has started since December 2023 and new ladders have recently been installed along the quay wall to improve accessibility for customers. We have also appointed a local company to install a CCTV system and a modern weather station in Barmouth harbour, which will be of great benefit to our officers and customers. The significant work by Network Rail of renovating the viaduct over the river Mawddach has been completed since December, and the Maritime Unit played an integral part by moving moorings and repositioning customers' boats to enable the contractors to gain unhindered access on the water.

Hafan Pwllheli and Victoria Dock

- 3.10 There has been a reduction in the number of customers at Hafan Pwllheli over the last quarter - down from 100% to 98%; losing 10 customers. Many of those who have cancelled reported that the increase in the cost of living is the reason and that they are giving up sailing altogether. Although the waiting list is strong at the moment, many have been getting in touch to remove their names from the list. This situation will need to be monitored.
- 3.11 Despite this, there has been an increase over recent months in the number of customers taking moorings in Pwllheli Outer Harbour (94% full - five new customers) considering that a large part of the Outer Harbour's customers are local people.
- 3.12 Victoria Dock is currently full with a waiting list for annual moorings. The work of adding a shower site and separate toilets for women is progressing, with the work programme to be completed before the end of March.

Archives

- 3.13 On average during the period from October to December, 90% of users were very satisfied with the service, 3% of users were satisfied, 3% of users stated that they were neither satisfied nor dissatisfied, and 4% were not satisfied. Most of the comments received were positive, such as: "All staff are friendly and ready to help", "Excellent service". However, from the point of view of those who were not satisfied, comments were received about the number of days the Record Offices are open.

Museums and Arts

- 3.14 The community arts team runs a programme of activities that support people and children to access, enjoy and experience the arts, especially in the field of health, well-being, education and tackling loneliness. Arts grants are allocated to community and voluntary groups to conduct activities in order to support arts opportunities for all; Night Out grants; SPF culture fund grants. The work that is currently underway includes 'Sgwrs a Chân' (chat and song) to support older people with Cynefin Housing Association in Porthmadog, Bala and Tremadog; 'Llwybrau Celf' (art pathways) for children in Aberdyfi, Llanbedrog and Bangor; Craft for Well-being for adults; art workshops for children in Porthi Dre. Work is ongoing with several partners, e.g. Youth Service, Galeri, Cwmni William Mathias, Theatr Derek Williams. Exhibitions are also held at Ysbyty Gwynedd Gallery.
- 3.15 Contributions are made to the Storiell Fusion scheme funded by a Welsh Government grant to support communities in need. Thus far, there are nine partners, approximately 18 activities, with around 634 having taken part, with children's packs for Porthi Dre and creative packs which the Libraries Service distributed.
- 3.16 There is an increasing demand for arts grants from our communities. Thirty-five organisations have been offered a grant from the Community Grants fund in the last quarter and 13 from the Night Out grant.
- 3.17 Work to upgrade the Lloyd George Museum has been commissioned. £360,000 will be invested on an SPF grant project before the end of December 2024.

- 3.18 Two of the three hire spaces in Storiell have now re-opened and are available for promotion and use. The number visiting and engaging digitally with Storiell has increased. It was seen that the total for December 2023 had increased by around 300 compared to 2022. By March 2024, projects such as Transforming Towns at Storiell to improve its presence and visibility in the city will bear fruit and contribute to attracting more users and visitors.

Libraries

- 3.19 Satisfaction surveys are carried out regularly by sampling in various libraries. A full Survey of all sites was carried out in November eliciting 656 responses. 97% reported that they were completely satisfied with the service and very positive comments were received from users showing how important the Library is to the people of Gwynedd. However, 15 complaints were received that the lift was out of order at Bangor Library. 'The lift has been out of action for years reducing access to disabled users' and 'I cannot get down with pram to children's area'. We are pleased to report that this work has now been scheduled.
- 3.20 This year's April-December lending performance is higher than last year's figures with 218,924 book loans compared to 218,262 in 2022/23. There is also an increase in active users figures, i.e. 52,568 borrowers over the last nine months compared to 48,518 during the corresponding period in 2022/23. In addition, e-newspaper usage figures are seen to be increasing again since changing from PressReader to ePress as well as bringing financial savings by changing supplier.
- 3.21 We are extremely proud that 'Boardmaker' Picture Communication Symbols, which is a resource for the families of children who cannot communicate verbally, is now available in three libraries in Gwynedd.
- 3.22 The service continues to distribute SIM cards to support internet access for those who need them. Through collaboration with the Council's Inclusion and Tackling Poverty Unit and Betsi Cadwaladr University Health Board, SIM cards were distributed to clients through the Patient Experiences Officer, who said - '...that is absolutely fantastic. I really cannot thank you enough, it will make such a difference to our patients. A couple more have already been identified by our OTs who will benefit as they have been unable to engage so far due to lack of internet access!'
- 3.23 The Service is in the process of restarting the Petha (Library of Things) scheme in Bethesda and Penygroes Libraries, and receives the support of Benthyc Cymru and Cyngor Gwynedd.

Neuadd Dwyfor

- 3.24 The satisfaction rate remains quite high, with the rate for the last three months October-December at 97%, 98% and 94%. The majority of comments praise the staff, the improvements to the building and the programme. The service does, however, try to respond to less favourable comments and is aware that a number of issues need to be completed, e.g. installing signs and exterior notice boards to advertise films. We are waiting for Property to complete the work and for the Phase 1 project organisation to come to an end.

Economy and Regeneration Services

- 3.25 The Economic Development, Tourism, Regeneration and Community Support services have focused their efforts over recent months on implementing the priority projects that have been outlined in Appendix 1. The performance of these services has therefore been reported there.

4. FINANCIAL POSITION

- 4.1 The Department has a plan which was supposed to generate savings of £100,000 in 2022/23 - 2024/25, namely the Neuadd Dwyfor remodelling scheme. The COVID-19 crisis led to a delay in realising the development work in the Neuadd, but this has now been completed. It is clear that the crisis and increase in living costs, along with other factors such as the new form of watching films, with a large number of people awaiting the release of films on the internet/television, raises concern about our ability to fully implement the savings. It is difficult at present to envisage the long-term impact on the numbers visiting the Neuadd.
- 4.2 One savings plan continues from previous years (a total of £45,000), which is subject to permission to increase parking fees on the site. During 2023/24, a financial package was secured for making improvements to the site and the work is expected to be completed in spring 2024. Concerns have been voiced locally about the introduction of parking fees, and local discussions will continue regarding future management arrangements for the site, including the introduction of fees.
- 4.3 Excluding savings from historical plans set out in 4.1 and 4.2, there are current plans of £242,180 for 2023/24 and £41,130 for 2024/25 that have been scheduled, and all have been realised or are on track to be completed on time.
- 4.4 The Department's new savings plans are presented in a separate item to this meeting of the Cabinet, with final approval of these in the Full Council on 7 March 2024. The developments of these plans will be reported in due course.
- 4.5 The Department's financial performance was reported upon to the Cabinet on 23 January 2024, with forecasts that the Department would overspend by the end of the 2023/24 financial year. The overspend is mainly due to a lack of income in Neuadd Dwyfor and Storiell, due to the reasons stated in 4.1, together with the higher costs of running Byw'n Iach properties. We will continue to review the areas closely in the new financial year, in the hope of identifying opportunities to implement savings where possible. The combination of underspend on other headings as well as use of reserves reduces the overspend reported to £59k.

5. NEXT STEPS AND TIMETABLE

- 5.1 We will continue to monitor the performance of the various services on a monthly basis and a special meeting of the Department's Management Team has been arranged for this purpose on 19 March 2024, where representatives from the Education and Economy Scrutiny Committee will be in attendance.

STATUTORY OFFICERS' VIEWS

Monitoring Officer:

No observations to add in relation to propriety.

Head of Finance Department:

"I am satisfied that the report is a fair reflection of the financial situation of the Economy and Community Department".

ECONOMY AND COMMUNITY DEPARTMENT PERFORMANCE REPORT	
Improvement Priority:	A Prosperous Gwynedd
Project:	Regenerating Communities and Town Centres
Project leader's Report:	Llyr B Jones
Date:	25 January 2024
The Project's Aim:	We will establish a Regeneration Framework by developing Local Regeneration Plans for 13 catchment areas across the County and will ensure cross-departmental arrangements within the Council to ensure that work programmes intertwine and share information with communities by continuing with the engagement work. Town/City Centre action plans will be prepared for individual towns.

1. What has been achieved since the previous meeting?

- Draft Local Regeneration Plans have been prepared for 13 catchment areas and have been circulated to the relevant Council departments.
- The first meeting of the regeneration Framework Cross-Departmental Group has taken place, and terms of reference have been agreed.
- A £1.8m SPF Funding grant proposal letter was accepted for the Improvement of the Gwynedd Town Centres Experience Project
- A Group to Improve the Town Centres Experience has been established comprising officers from relevant Departments to coordinate and implement the project.
- The Bangor and Caernarfon Town Centres Schemes have been completed, and the Porthmadog Town Centre Scheme commissioned (with a Welsh Government Transforming Towns grant).
- A grant has been secured for the preparation of town centre plans for Pwllheli, Bala and Dolgellau.
- A meeting of the Council's Vacant Property Group has been held which reviews the priority list of vacant properties.

2. The next steps

- Departments will be invited to submit comments / information on the Local Regeneration Plans by 8 February.
- We will prepare presentations to the Area Forums to brief Local Members.
- We will organise a series of workshops in the local communities to discuss the Local Regeneration Plans and arrangements for coordination and monitoring.

- We will proceed to implement and complete the Project to Improve the Town Centre Experience during 2024/25.
- We will commission Town Centre Plans for Pwllheli, Bala and Dolgellau.
- We will submit an update by the Council's Vacant Property Group to the Leadership Team.

3. Risks

- It is anticipated that the coordination and monitoring of Local Regeneration Plans will vary from area to area, with some areas requiring more support from the Council.
- The timetable for implementation of Town Centre Improvement Experience Project – needs to be completed by December 2024 in accordance with SPF funding requirements.
- Town Transformation grants need to be claimed by the end of March 2024
- Uncertainty about Welsh Government Transforming Towns revenue grants to prepare town centre plans in 2024/25

4. Timetable

- We will be offering updates on the Regeneration Framework (and draft Local Regeneration Plans) to local Members through Area Forums
 - Bangor / Ogwen Forum: 28/02/24
 - Gwyrfai Area Forum: 29/02/24
 - Meirionnydd Area Forum: 05/03/24
 - Dwyfor Area Committee: 11/03/24
- We will be holding meetings with local organisations in all 13 areas to discuss the draft plans, and arrangements for collaboration during March / April 2024
- It is intended to publish the revised versions of the Local Regeneration Plans in April / May 2024.

ECONOMY AND COMMUNITY DEPARTMENT PERFORMANCE REPORT	
Improvement Priority:	A Prosperous Gwynedd
Project:	Creating the best possible circumstances in Gwynedd for businesses and community enterprises to thrive, and support the people of Gwynedd into work.
Project leader's Report:	Sioned Williams/Dylan Griffiths
Date:	25 January 2024
The Project's Aim:	We will support businesses and community enterprises in Gwynedd to thrive in many ways such as product development and accessing new markets, helping enterprises to save money by reducing waste and using technology more effectively, supporting businesses in Gwynedd to trade together and prioritise helping enterprises that commit to paying a 'real living wage' to their employees. We will encourage businesses to make the most of the Welsh language, develop more work units for letting, and strive to ensure that the North Wales Growth Deal projects benefit the people of Gwynedd. In addition, we will help the people of Gwynedd to fulfil their potential and support those who are excluded from the labour market to return to employment and will work with employers to assist them to secure sufficient workers.

1. What has been achieved since the previous meeting?

Supporting Business and Enterprise

- 20 businesses have received financial offers totalling £916k through the [Cymunedau Mentrus](#) (Enterprising Communities - ARFOR) scheme. It is anticipated that the investment will lead to the creation of over 50 jobs.
- The [Cronfa Her ARFOR](#) - ARFOR Challenge Fund offers support to research and pilot innovative solutions to local and regional challenges while learning about the link between the economy and the language. 146 expressions of interest have been received across the ARFOR region, with 59 of these from Gwynedd. 54 organisations from Gwynedd have attended the Challenge Workshops that are part of the project and 8 organisations from Gwynedd have submitted applications to the Fund, a value of £668k.
- 24 businesses have received a total of £340k through 'small grants' from the [Business Development Funds](#) launched in August. The number of applications for a small grant was so large the application system had to be closed 4 weeks after it opened. An additional £150k of funding has been secured to support some of the 22 businesses on a waiting list.

- The award process for 'major grants' (over £25k) from the [Business Development Funds](#) has been completed. Businesses had to compete for a major grant and received 57 applications asking for £5.09M of assistance before the mid-September deadline. In response to the strong demand, additional funding was targeted and as a result we have been able to offer £989k to 10 businesses.
- All businesses that receive money must commit to pay their staff a real living wage and to review their use of the Welsh language. As a result, 79 Gwynedd businesses have completed the Welsh Language Commissioner's language assessment – with 12 having gone on to receive the Commissioner's 'Cynnig Cymraeg' accreditation.
- It should be noted that the Department has also secured an additional £930k of support in the period to improve 28 buildings in Gwynedd town centres, which – in turn – will benefit local businesses.
- The [Ailwefru](#) scheme has been commissioned by the Council to help local businesses review their activity and prepare for the future. 32 businesses have already signed up to receive support from the scheme.
- The Department has jointly funded the Community Catalysts scheme with the Adults Department to encourage local people to start small businesses in home care provision. 16 local people have already signed up and are currently working towards setting up a care initiative.
- The Department has commissioned the scheme to provide support and advice for local businesses to make better use of technology to reduce their costs and/or increase their sales. More than 100 local businesses will benefit from the scheme by March 2025. A planning permission to erect new work units by the Council in Minffordd has been confirmed.
- Detailed designs and tender documentation have been prepared, and the appointment procedure is about to begin. The Welsh Government has convinced them to become a partner in the scheme and share the cost.
- We have supported the North Wales Growth Bid schemes, giving particular attention to the projects that offer Gwynedd the greatest benefit in the Digital Programme, Energy Programme and the Agri-Food & Tourism Programme. Since the last meeting we have supported Grŵp Llandrillo Menai with their plans for the development of a Food Hub in Glynllifon and Zip World has received an outline offer for funding from the Growth Bid.
- The Cabinet Members' programme of visits to businesses continues, with a total of 5 visits to prominent businesses in Gwynedd scheduled for Cabinet Members and 5 have already taken place in 2023/24.
- A programme of drop-ins for local businesses within communities has been organised and 3 have been held since the last meeting, along with a joint funding clinic with the Development Bank of Wales.

Supporting the people of Gwynedd to return to work and achieve their potential.

- The [Llwyddo'n Lleol](#) programme is now fully operational targeting young people aged 11-35 to increase awareness of the available job opportunities in the ARFOR region; enterprise and opportunities to return to their native community.
- 101 local residents who were inactive have secured a job following the support of the Gwaith Gwynedd team during the year – an increase of 49.
- 180 more Gwynedd residents signed up to receive Gwaith Gwynedd support in the period. (238 in total in the financial year)
- Seven job fairs have been scheduled throughout the county for February to April 2024. 55 employers have registered to attend.
- A new activity to support residents to increase their skills – and thereby their earnings – has started and 28 have already signed up for support.
- A new programme of work – in collaboration with the Education Department and the Adults Department to improve skills and prevent inactivity – is underway using £700k of SPF funding.

2. The next steps

The main activity for the next phase will be:

- Implementing the management system for grant offers, claims and monitoring during January 2024
- Hold a promotional campaign for the new support schemes between January and March 2024 focusing on areas that do not normally benefit.
- Working jointly with other partners who have received SPF funding to support businesses to encourage them to pay attention to businesses and areas in Gwynedd that don't normally benefit.
- Establishment of Gwynedd's new service promotion campaign during Q3 2023/24
- Appoint a builder for the new Council work units at Minffordd during Q1 2024/25

3. Risks

- The response of Gwynedd businesses and enterprises to the SPF and ARFOR funds significantly exceeded the funding available. With applications in excess of £11M and only £2M available, it is therefore inevitable that most businesses are going to be let down. Good applications will have to be rejected as there is not enough money available to meet demand.
- The funds have highlighted the diversity in the capacity of businesses within certain sectors and areas to respond to funding opportunities.
- Along with the high demand, the unreasonably short timeframe to implement the funding programmes is preventing efforts to support areas and sectors that are unable to respond immediately.

- The short timeframe for implementing the financial programmes means that the Department must recruit many temporary posts.
- With all the programmes ending simultaneously in March 2025, 12 posts will be under threat within the Department. The number will be much larger across the county's organisations.
- There is significant uncertainty about the size and administration of any funds after March 2025, which hinders our ability to plan for the future.
- The squeeze on public budgets is wider and this increases the pressure. The Welsh Government is already cutting back on the funding they provide to Local Authorities within areas such as support for the unemployed.
- There are significant investments in the county, including the Growth Deal projects, that are subject to additional risk from any change in the long-term policies and commitments of the Welsh Government and the UK Government.

4. Timetable

See above.

ECONOMY AND COMMUNITY DEPARTMENT PERFORMANCE REPORT	
Improvement Priority:	A Prosperous Gwynedd
Project:	Promoting our Culture and a Sustainable Visitor Economy
Project leader's Report:	Roland Evans
Date:	25 January 2024
The Project's Aim:	We will take a series of measures to promote our culture and create a sustainable visitor economy: ➔ The Gwynedd and Eryri Sustainable Visitor Economy Plan, formed jointly with the Eryri National Park Authority, will be launched in spring 2023. The principal partners and stakeholders will collaborate to deliver the Plan by establishing a Gwynedd and Eryri Sustainable Visitor Economy Partnership. ➔ We will ensure prosperity from the Northwest Wales Slate Landscape World Heritage Site designation and secure resources to fulfil the World Heritage Site Action Plan. ➔ We will control Motor Homes visiting Gwynedd by piloting the development of up to six designated sites for motor homes to stay overnight. ➔ Hosting the 2023 National Eisteddfod in Gwynedd will be a platform to celebrate our culture and language, arts and sports and ensure that the Eisteddfod leaves a positive legacy for Gwynedd communities.

1. Progress since the previous meeting, September 2023:

Sustainable Visitor Economy Plan

- Meetings have been held with the National Park to agree on a functional model to ensure ownership and to operate effectively.
- Draft measurements are in place.
- Draft structure discussed and needs to be simplified / modified before implementation – particularly in light of proposed savings to the Tourism Service.
- Draft action plan is in place.

Benefits of the Slate Landscape World Heritage Site Designation

- Operational arrangements established for the Llewyrch o'r Llechi - Levelling-up project
- Llechi Cymru's hybrid Annual Meeting was held at Cell B, Blaenau Ffestiniog on 16 November 2023 with several local attendees and speakers.

- Developmental work on LleCHI 2's application to the Heritage Lottery Fund continues and a positive meeting was held with the Fund on 14 December 2023 with approval given to proceed with the submission of the Round 2 application.
- Northwest Wales World Heritage Sites Coordinator is operational.

Motorhomes

- Cricieth site is operational – but vandalism issues have arisen and disrupted any significant attention being given to the site.
- There has been a solution in terms utilities and work is now underway at the other 3 sites – Caernarfon, Pwllheli and Llanberis, but there may be increased costs at Pwllheli due to the distance to connect to the water supply.

The legacy of the Eisteddfod

- SPF funds have been successful in attracting applications.
- Many of the projects require claims in more than one section during the project so arrangements are being worked out to facilitate this.
- Round 1 events have reached the payment stage - worth £31,500.
- £30,476.79 worth of Round 2 Events bids have also reached the payment stage.

2. The next steps

Sustainable Visitor Economy Plan

- Establish the implementation structure, to include a voice for partners, by February 2024.
- Implement the Plan immediately.
- Implement SPF funded plans and activities by 31 December 2024.

Benefits of the Slate Landscape World Heritage Site Designation

- Secure match funding from key partners before the end of March 2024 for the Heritage Lottery application.
- Submit a Round 2 application by the end of February 2024.
- Manage and implement Levelling Up projects by March 2025.
- Manage and implement Shared Prosperity Fund projects by December 2024.
- Continue to engage with the Area's communities and businesses.
- Publish the Annual Report by 31 March 2024.

Motorhomes

- Completion of the installation of the 3 new motorhome sites in Llanberis, Caernarfon and Pwllheli to launch the 4 sites before Easter 2024.
- Ensure that the Gwynedd Parking App accepts payments for the Motorhome sites before Easter 2024.
- Enforcement elements as part of the complete package need to be implemented by Easter 2024.

The legacy of the Eisteddfod

- Commence the work of reviewing the need for a culture plan for Gwynedd depending on the publication of a Welsh Government plan by March 2024.
- Hosting an event to celebrate Gwynedd's culture and arts through Gwynedd Creadigol in February 2024.
- Consider opening any further financial rounds for SPF or the Strategic Grants for the Arts fund when the budget is known by April 2024.

1. Risks

Sustainable Visitor Economy Plan

- Concern from some about a lack of progress in implementation is a risk to ownership and operation.
- Developing a sprawling or complex structure creates unsustainable administrative work.

Benefits of the Slate Landscape World Heritage Site Designation

- Not securing match funding from partners.
- Failure in the Round 2 stage due to increased operating costs.
- Some significant developments can pose a risk to the designation – but sound planning arrangements are in place.

Motorhomes

- Unable to deliver by the start of the 2024 season.
- Need to spend Welsh Government money within a tight time frame (end March 2024).
- Learn lessons from vandalism or anti-social attitudes locally.

The legacy of the Eisteddfod

- The failure of some projects to implement their activity within the tight SPF schedule (End of September 2024).
- The need to develop a Culture for Gwynedd Plan – but a risk of failing to act in light of the extremely challenging financial climate.

2. Timetable

- Act in line with funders' tight timetables during 2024 and 2025 and the next steps as seen in 2.

CYNGOR GWYNEDD - Report to Cyngor Gwynedd Cabinet

Title of Item:	Performance Report of the Cabinet Member for Corporate Support
Cabinet Member:	Councillor Menna Trenholme
Relevant Officer:	Ian Jones, Head of Corporate Support Department
Date of Meeting:	20 February 2024

1. Decision Sought

To accept and note the information in the report.

2. The reason why the Cabinet needs to make the decision

In order to ensure effective performance management.

3. Introduction and Rationale

3.1 The purpose of this report is to update my fellow members on what has been happening in the fields within my remit as Cabinet Member for the Corporate Support Department. The report will outline what has happened to date against pledges within the Cyngor Gwynedd Plan for 2023-2028; the progress of performance measures; and the latest on the savings and cuts schemes.

3.2 I would like to remind you that all the issues have already been discussed and scrutinised by me at a meeting of the Corporate Support Department Management Team on 17 January 2024.

3.3 I am satisfied that the projects being led by the Department, together with the day-to-day performance, are being undertaken within the budget. I wish to note my appreciation of the work of all the officers of the Department and recognise the key contribution they make to supporting the work of the Council.

4. Projects in the Cyngor Gwynedd Plan 2023-2028 (Priority Areas)

The Corporate Support Department is leading on six projects within various priority areas in the Council Plan for 2023-2028. I summarise what has been achieved thus far as follows:

4.1 Keeping the Benefit Local

4.1.1 The Council is responsible for procuring, or purchasing, a number of goods and services and is keen to try to ensure that local businesses can compete and win these contracts in order to ensure that as much of the Council's expenditure as possible stays local.

4.1.2 Training and awareness raising of social value arrangements have taken place during the pilot phase of the regime. Further work will be undertaken to raise awareness of wider officers who procure in due course.

- 4.1.3** Workshops for local businesses are held (regarding social value arrangements). Work is ongoing to try and guide local businesses through the regime as a specific agreement arises and national support that is available will also be taken advantage of. The food agreement tender period is currently open, from November 2023 to April 2024.
- 4.1.4** Guidelines are in place for the new arrangements developed as part of the pilot. A data collection system will be required following the termination of the agreement to use the portal of consultancy firm Social Value Portal.
- 4.1.5** Work is underway to review procurement policies to include the social measures but it is also necessary to reflect the wider changes to come with the series of new national regulations during the year. Modifications to the Procurement Policy are due to be completed by the end of the financial year. Preparations for the changes in regulations have begun. These developments will be shared with the Corporate Governance Group and an awareness raising session has also been held for the category and procurement teams, field leaders and YGC.
- 4.1.6** Following a meeting with all category management and procurement teams it was agreed to hold additional performance challenge meetings for reporting on the results of reviewing contracts. Two meetings will be held during the year.

4.2 Women in Leadership

- 4.2.1** The aim of this project is to increase the number of women who apply for and attain senior positions within the Council by reviewing the employment conditions and the working environment to attract more women to undertake the work in future.
- 4.2.2** The fourth series of the Developmental Programme has been running for the past two months and has now come to an end. Over 40 women have now followed the Programme, and analytical work on the first 3 cohorts shows that 33% of attendees have accepted a senior position since completing the Programme.
- 4.2.3** Another series of 'Sgwrs dros Baned/Discussions over a Cuppa' has come to an end. There have been some very entertaining discussions in this series again, including Ffion Johnstone and Elin Gwynedd from the Health Board, and Sian Pugh who is a new Assistant Head within the Council. The sessions had wide and very different audiences. While quite a few Managers and Assistant Heads had joined for the conversation with Ffion and Elin, a number of young and enthusiastic officers had joined to hear Sian's talk. Data shows that around 60 individuals later watched these sessions using a link on the intranet.
- 4.2.4** Arrangements are underway for a "Trwy Lygaid Merch/Through the Eyes of Women" event to be held on International Women's Day on 8 March 2024. This will be an event for Managers and Team Leaders, whether male or female which will also tie into the staff well-being programme. The aim is to raise awareness of the recognised challenges women face in the workplace, whether that be practical caring arrangements and work-life balance, lack of confidence or health conditions such as menopause.
- 4.2.5** The project board agreed to run a pilot relating to avoiding unconscious bias and ensuring equality in the appointment process, namely the introduction of anonymous application forms. The pilot will be conducted with Team Leader level positions and above across the organisation. Modifications have been made by the IT Service to the recruitment and appointment system within the staff self-service site to enable the anonymous application

forms pilot to be run. The modifications mean that the pilot can happen smoothly and that additional work will not arise for Managers individually or for the Support Service. A message has been shared and all Heads of Department to inform them about the pilot. A feedback form has also been created so that quantitative and qualitative feedback about the impact of the pilot can be collected.

4.2.6 Further work has taken place, and continues to take place on the statistics. It is intended that this data can inform the work of this project going forward. While there is more detailed analytical work to be done on the statistics that have been presented, on the face of it, the statistics show that there has been movement since the project was established, and that 41% of management level positions (Service Manager or above) are now held by women, compared to a figure of 30% when the project was established.

4.2.7 An Information Pack for the project has been placed on the Project Intranet pages and conversations have been arranged with Heads of Department to discuss the statistics of their individual Departments and how best to share the information pack within their Department.

4.3 Ensuring Fairness for All

4.3.1 In order to put the people of Gwynedd at the centre of everything we do, we must identify any barriers that some people face when seeking employment or obtaining services from the Council.

4.3.2 Work on organising training has been ongoing, and it is hoped to offer LGBTQ+ and British Sign Language sessions to frontline staff, with priority initially for those services who have already made a specific request for support. This is work earmarked for the end of the financial year, but it is expected that the theme will also run into next year. Discussions are underway to offer Transgender Awareness training organised by the Community Cohesion Service. Additional sessions of Your Responsibility for Equality have been offered to Members which have not yet been held, these will take place in February. The Equality Advisor has been on the new pilot of WLGA's anti-racism course.

4.3.3 The Equality Impact Assessment, Socio-Economic Duty and Welsh electronic form has been piloted by the language and equality officers. The IT Service is currently making improvements as a result. Further work will be needed before it is ready for further piloting.

4.3.4 Work on seeking level 2 certification of the Disability Confident scheme has been delayed recently. Work has now resumed and currently it is planned for it to be completed by the end of March 2024. Should there be any further slippage, then the work would be incorporated into the new Equality Plan for 2024/28.

4.3.5 An outline of an action plan, in response to the Inclusive Employers company review, has been developed. An outline of actions is set out in a consultation document on equality objectives 2024 – 28.

4.3.6 Work continues to ensure that more members of staff complete the equality questionnaire and there will be an attempt to target specific groups of staff over the coming period.

4.4 Workforce Planning

- 4.4.1** The work of identifying gaps and acting pro-actively is a priority that has highlighted itself more than ever recently and there is a need to respond to the staffing challenges faced by many services across the Council. A bespoke work programme and milestones have been formulated to identify short, medium and long-term gaps. Work is underway to establish detailed programmes of work for a programme of up to seven sub-projects contributing to the full project.
- 4.4.2** An exercise was recently undertaken with a Service in the Environment Department to pilot workforce planning. There are plans to expand the exercise on workforce planning practices to other services and departments as soon as possible.
- 4.4.3** 26 apprentices and 15 professional trainees are currently being supported. 14 new apprentices have also been appointed. Recruitment for apprentices and trainees for 2024/25 has already begun.
- 4.4.4** Over the past few weeks, a number of pupil engagement events have been held in Schools, including Ysgol Dyffryn Nantlle, y Moelwyn and Brynrefail. Staff have also attended a number of external events including job fairs and information panels to promote careers at the Council.
- 4.2.5** A new careers website has been launched as part of the work to develop the Council's image as an employer. The overall feedback has been good for the development and further opportunities to develop the content have been identified.
- 4.2.6** Further consideration needs to be given to the potential timetable for developing a work experience plan and also on how further education institutions can be influenced to develop the Welsh language provision available for apprentices and trainees.

4.5 Promoting use of the Welsh Language by the residents of Gwynedd

- 4.5.1** We will carry out specific projects that will promote the use of the Welsh language and increase the opportunities to use Welsh in the community. This will include increasing the use of the Welsh language when engaging with public and community services.
- 4.5.2** The Gwynedd Language Strategy 2023-2033 was adopted by the full Council on 7 December 2023, and an initial work programme was created. Meetings will be held in 2024 with all heads to consult on the content of the new language strategy work programme.
- 4.5.3** The entire Prosiect 15 budget has now been spent with a significant proportion of it having gone on employing an assistant project officer to produce original Welsh language content for social media. During the period in question a video was published by a medical student originally from Abersoch who talked about her story and material was also produced to accompany the *Defnyddia Dy Gymraeg* campaign by the Welsh Language Commissioner's Office. A successful session was held with young people at Llanrug Community Youth Club to create a Welsh language Christmas-themed video which received a positive response.
- 4.5.4** Work to populate Cyngor Gwynedd's place name map continues with workshops held in 4 primary schools during November and December namely Pennal, Corris, Garndolbenmaen and Borth y Gest. The workshops discussed the origins of place names and the importance of

respecting and protecting them as well as giving a practical session on how to populate the place names map. More workshops will be held in the new year.

Further research on changing street names in two pilot areas has led to a number of complications which make it not feasible to go ahead with this aspect at this time. As a result of this it was decided to focus on the sign installation scheme on settlements, bridges and district boundaries and increase the visibility of the project. It is hoped to install commote signs on 'A' roads as well as Welsh signs in Dyffryn Ogwen, Pistyll, Trefor and Caernarfon before the end of March.

Following lobbying by Cyngor Gwynedd officers, the Welsh Government has now changed a law and given local authorities powers to approve requests for Welsh-only "Welcome to town" signs from Town Councils. We are very proud of this success and will be engaging with town councils in the new year to inform them of this.

4.6 Strategic Review of Health and Safety Management

4.6.1 The project looks at the strategic management of health and safety within the Council and how that ties into overall governance and performance systems. It entails undertaking a full review of the management system in its entirety.

4.6.2 One of the work-streams is the upgrading of the Health and Safety IT system. Following going out to market for a corporate health and safety software system, we decided to ask the IT service to create an internal system. This was mainly due to limitations and obstacles in the communication between external and other internal Council systems. Significant mapping has taken place on the needs of the Service, and the IT service will start the development of an internal system with a view to piloting and consulting with the Corporate Forum on the needs of the Departments/Services of the system.

4.6.3 A review of the health and safety training of managers/team leaders has now been logged and is being shared with departments. Additional renewal courses up to December 2024 have been scheduled in line with the needs identified from the review. A template to reflect what needs to be done in practice to meet the standards of the IOSH model has been created, so that departments can move towards the integrated model.

4.6.4 Work is being undertaken to review the work programme of a health, safety and well-being project so that the priorities align with the models template. Meetings will be held with each Head of Department to discuss the models, what is expected from their department, and what needs to be completed by the Health, Safety and Well-being Service. A report will be prepared to the Corporate Management Team outlining the project's work programme.

5. Performance

5.1 I note below an overview of the Department's performance during the financial year to date. Not all services are referred to, but I am keen to confirm that I am satisfied with the current performance of those services not referred to here.

5.2 Support

5.2.1 The Support Service undertakes the advertising of vacancies in the Council and reports on the average number of days taken to appoint to a post from the date of advertisement. In

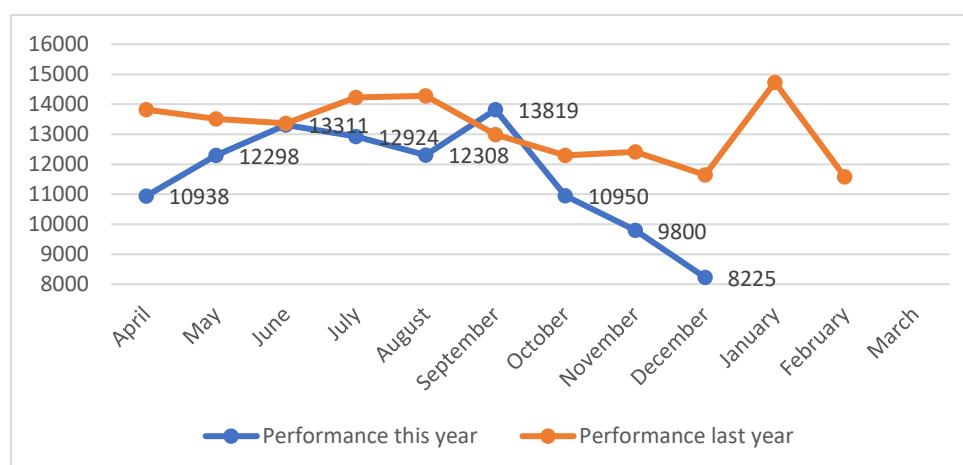
December, 56 jobs were advertised for the first time and 9 jobs were re-advertised. The number of jobs being re-advertised has dropped to an average of 4 adverts per month since January 2022

- 5.2.2** The Support Service measures the number of days from submitting an application to receiving the result of a 'DBS' check. In December the Support Service submitted 148 applications to the DBS. The DBS processed 75%. Performance reports from the DBS system have been sent to the Departments which take a high number of days to complete applications.
- 5.2.3** Work has been undertaken to develop the ability for candidates to be able to submit feedback about the experience of completing a job application form with the Council within the jobs system. This development has been running for three months and feedback has been received from 502 candidates which is around 60% of the number who have applied for a job on-line with the Council. 96% were completely happy with 98% giving a score of 4 or more. Work is being done to look at the comments of the 4% to find out if there are further improvements that can be introduced to the system.
- 5.2.4** In November and December, the Support Service ran 'Staff Self-Service' workshops for new staff and staff who have moved roles. The sessions raised staff's awareness of the self-service provision available for them and give them the opportunity to learn how to use it and promote its use among their services and departments.

5.3 Customer Contact and Registration

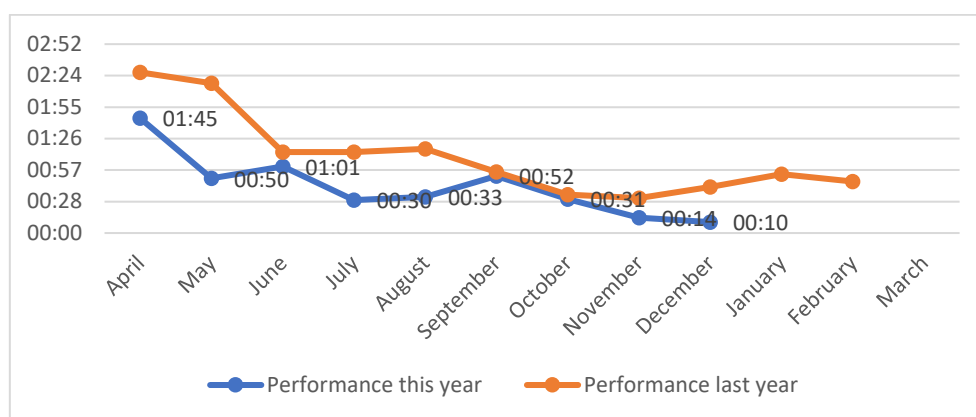
- 5.3.1** Over the past few years the Customer Contact and Registration Service has coped extremely well under difficult circumstances, and steps have been taken to strengthen the service's capacity.
- 5.3.2** In terms of the number of calls answered monthly, the number of November and December calls is significantly lower than the same period last year. Garden waste orders usually open in November. Garden waste orders this year did not open until January so this is contributing to the lower level of calls coming in during November and December. In addition, customers also did not have to make an appointment to go to our recycling centres over Christmas, so this led to a reduction in the type of calls being received.

Number of Calls answered (monthly):



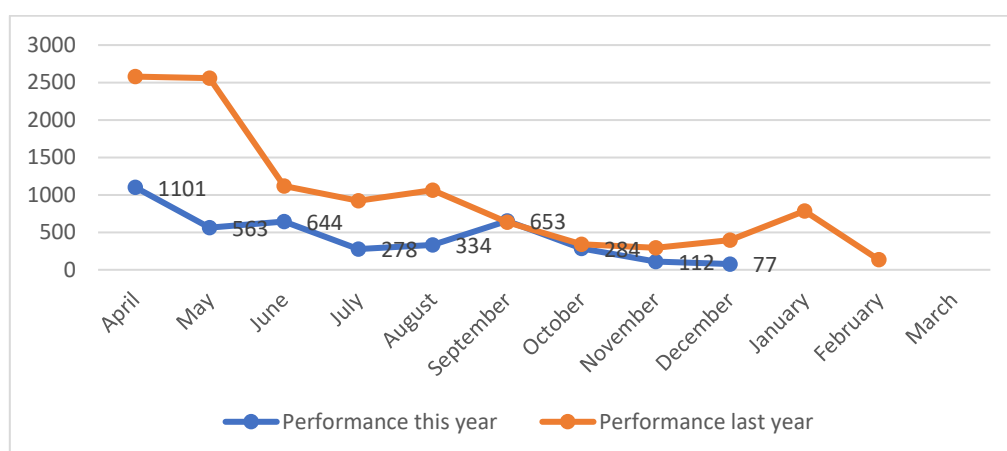
- 5.3.3** As fewer calls were received to the Contact Centre during November and December staff were available to answer calls more quickly, and fewer people had to queue before receiving an answer. Although new staff were recruited into the service in October, the use of casual staff has given the service the ability to train new team members more quickly.

Contact Centre average calls answered (monthly):



- 5.3.4** There was also a reduction in missed calls over November and December, that was due to more staff being available to answer phone calls.

Number of missed calls (monthly):



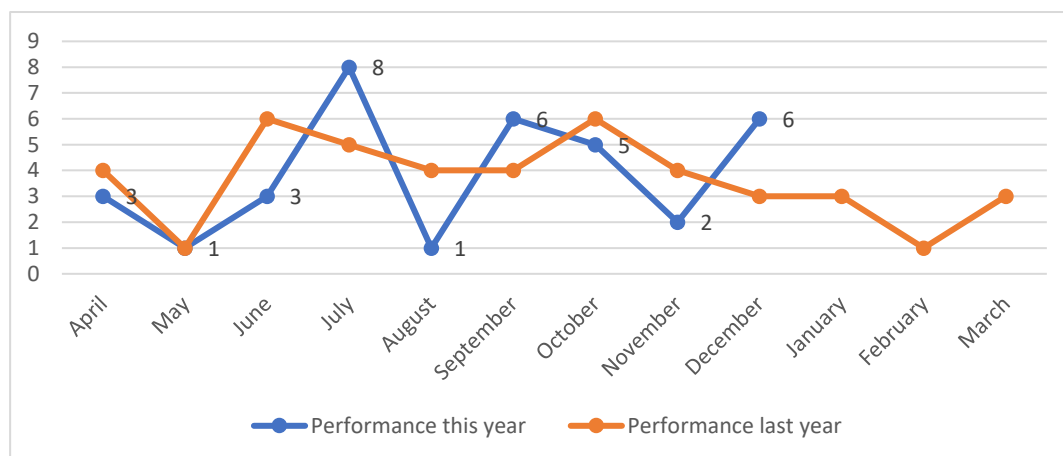
- 5.3.5** With fewer calls coming into the Contact Centre and new staff appointed and trained there was an opportunity to monitor the live chat and use of 'webchat'. Turning on the 'live' chat on the webchat shows that there is customer demand for this type of medium and the intention over the coming period is to make greater use of this technology.

5.4 Research and Information

- 5.4.1** Incidents where personal information is disclosed in error, or inadvertently, continue to occur in places within the Council. The numbers vary widely every month, with the total over the whole year remaining marginally lower than last year (35 between April - December this year, compared to 37 in the same period last year). Around half of recent cases continue to involve emails sent to the wrong recipient, and following a discussion at the Information Governance

Panel in November we are trialling turning off "Autocomplete" in the email system for some staff, then assessing the extent to which this makes mistakes less likely, and its impact on work effectiveness.

Number of information incidents:



- 5.4.2** The Research and Information Service monitors and reports regularly on the percentage of freedom of information requests that were responded to within 20 working days. Performance is slightly better than last year but continues to cause some concern and the service is negotiating with some teams where there is a high volume of applications, and slow replies, which is taking the Council's performance down. This field is also addressed in the Information Workshops currently being provided for each Department's managers and team leaders. Statistics are shared by Department/Service with Heads.

6. Financial Situation / Savings

- 6.1** The Revenue Budget 2023/24 – End of November 2023 Review report was presented to Cabinet on 23 January, where the Department is forecast to overspend by around £22,000 by the end of the financial year.
- 6.2** There is a combination of reasons for this likely overspend, such as increased pressure on a particular budget e.g. counselling and several services not reaching their income targets.
- 6.3** The Department's total savings schemes for 2023-24 is £275,250, with these savings already fully realised or on track to be achieved in a timely manner.

7. Views of the Statutory Officers

7.1 Chief Finance Officer

I am satisfied that the report is a fair reflection of the financial position of the Corporate Support Department.

7.2 Monitoring Officer

No observations to add in relation to propriety.



CYNGOR GWYNEDD – Report to Cyngor Gwynedd Cabinet

Item title:	Cabinet Member for Corporate Support and Legal Services Performance Report
Cabinet Member	Councillor Menna Trenholme
Relevant officer:	Iwan Evans – Head of Legal Services
Meeting date:	20 February 2024

1. Decision Sought

Accept and note the information in the report.

2. The reason why Cabinet needs to make the decision

To ensure effective performance management.

3. Introduction and Rationale

- 3.1 The purpose of this report is to update members on what has been occurring in the areas for which I am responsible as Cabinet Member for Corporate Support and Legal Departments. The report will include outlining what has happened on the Legal Services projects and performance measures.
- 3.2 I would like to remind you that all issues have already been discussed and scrutinised by me at a meeting with the Management Team on 17 January.
- 3.3 I am satisfied with the projects led by the Legal Service together with the day-to-day performance of the Services and recognise the key contribution they make to support the work of the Council.

4. LEGAL SERVICE

- 4.1 Service performance is monitored by seeking the feedback of from Service Departments who are provided with services. This is assessed against a 1-5 scale in the form of a simple email questionnaire and the monitoring routine has improved. (5 = Very Satisfied down to 1 = Completely Dissatisfied). It is also possible for respondents to add a comment along with a rating. Since the beginning of the financial year, the score is generally very high with 84% being very satisfied with the service and only 14% responding that they were reasonably satisfied with the response on a service provided. This reflects a period of staff turnover and locums that has fed into the response. As noted below we have moved from this situation in a positive manner.

Score	Percentage	April	May	June	July	August	Septi	Oct	Nov	Dec	Jann	Feb	March
Very Satisfied 5	84 %	10	1	4	15	3	10	2	3				
Satisfied 4	2%						1						
Reasonably Satisfied 3	14%						6		1	1			
Dissatisfied 2													
Very Dissatisfied 1													
Response percentage	43%												

4.2 We will continue to prioritise the recruitment of the Legal Team.

What has been achieved?

The Legal Team's recruitment position has changed positively and is now on a sustainable basis for the future. All relevant posts have now been filled except for the Housing and Projects Solicitor post which continues with 2 part-time locums specialising in their areas (1 on Land and Property work and 1 on commercial work) in order to maintain stability. This reflects a very specific requirements attached to this post which kept under review. The department successfully recruited a full-time post for maternity leave which is to started in February following a successful advertising and interview exercise, attracting a number of valid applications.

Next steps

The situation is to be kept under regular review.

Risks

Recruitment risk is now showing green but it is accepted that the use of locums although facilitating work, does not fully meet all requirements and historical evidence shows that it has created additional problems (see comments on satisfaction with the department) . The Service has identified the deficiencies on difficulties created and there are adjustments in the arrangements to overshoot arrangements. This is achieved by the Service Manager and the Head of Service .

Timetable

By the end of quarter 3

4.3 We will jointly procure new case management software for the Legal Service and partners in North Wales

What has been achieved?

In collaboration with 3 other Councils in the North we have procured a company to be the new system provider. This is a system that is central to the services ability to operate. This system while more expensive in terms of costs will be a significant step forward in terms of online accessibility, agility with systems such as iGwynedd, and Microsoft Office and maintain a paperless office . It will also open the door to opportunities such as e.g for departments to log in for information about cases and progress on them. The system became live in the week before the 2023 Christmas holidays, and despite the some of technical elements the outlook for its use is positive.

Next steps

The main system is in place but work is now at it's peak to create a system that is tailored for Gwynedd's needs. A number of training sessions have already taken place and more are being prepared. The team has regular weekly sessions to handle the system and to support each other to develop better use of the system and to review the department's historical systems.

Risks

The main risk was previously about termination of the support for the previous system. The residual risk involved the correct transfer of all department data to the new system. This has happened and although there were some technical problems at first, these have been resolved. Obviously a date has been given for the finished work but this will need to be ensured before the current system is discontinued. .

Timetable

The 6 months of internal practical period has been appointed for support and training on the system.

4.4 We will review and secure adequate resources for supporting demands on the Service arising from regional work

What has been achieved?

Resolving our recruitment situation means that it is now possible to move forward to plan how the regional requirements can be met. As the North Wales Corporate Joint Committee becomes operational there is an increase in the resource ask. This remains a challenge but an issue that is recognised within the project. .

Next steps

Working as part of the Joint Committee's no management to identify resources necessary to maintain the new authority. An additional resource is now in place to support the Monitoring Officer

Risks

Failing to ensure adequate resources and create the appropriate capacity to maintain the establishment of the Joint Committee.

Timetable

It is proposed that the functions of the Ambition Board transfer to the Joint Committee Incorporated by during 2024. The resource will be identified and developed throughout this period.

PROPRIETY

4.5 We will continue to support and advise on the functions of the Council in terms of ensuring constitutional, legal and administrative propriety.

What has been achieved?

This work is on going but specifically a series of "Good Decisions" seminars are planned for staff. Seminars will be about the legal foundation of for good decision making. Although the timetable has slipped they are scheduled to be established in Summer 2024. . The objective of the courses is to explain the basics of decision making in public bodies together with the

constitutional and regulatory framework regarding this area. A pilot has been carried out and response has been positive .

Next steps

Establishing a programme of seminars

Risks

This work is part of the Council's governance arrangements which are overseen by the Governance Arrangements Group

Timetable

The work is ongoing . Due to other requirements date for holding the these seminars has slipped.

4.6 We will work with the Standards Committee, Political Group Leaders and Members together with relevant officers to maintain and support high standards of conduct among councillors.

What has been achieved?

We will actively focus on collaborative work and support with the new duties on member behaviour with group leaders. In addition, reflecting a requirement highlighted in induction sessions Code of Conduct courses are planned for Council members in the last quarter of 23/24 and earlier if resources allow.

Next steps

A meeting was held between members of the Standards Committee and Group Leaders to promote and support the implementation of the new duties. As a result agreement was reached on the proposed criteria and an arrangement for regular meetings between the Monitoring Officer and the Conductors to support the work.

Risks

Council reputational risks if the duty is not implemented .

Timetable

Prepare for the the annual report of the Standards Committee and in particular the relationship with the role of Group Leaders. The initial Monitoring Officer meeting with the Group Leaders has now taken place.

4.7 We will complete the implementation project for the Local Government and Elections (Wales) Act 2021 and in particular consideration on the local election voting system options.

What has been achieved?

The main elements of this project have now been addressed and are becoming operational. The progress was reported to a Governance and Audit Committee. The element of the project that needs to be completed is to address the choice of voting systems for council elections. A report was presented to the Full Council December 2023 at which it was resolved to move forward with a process.

[Item 11 - Selection on the Adoption of a Single Transferable Vote System for Gwyn.pdf Council Elections \(gov.wales\)](#)

Next steps

With the Council's decision in December to move forward with initiating an STV consideration process a team has been established to manage the project and it is intended to report to the March Council with a programme and consultation process for approval

Risks

A statutory timetable means a decision would have to be reached by November 2024 if the move to an alternative system is to be made.

Timetable

Report to the March Council.

4.8 We will undertake and review the Constitution during the year to ensure that it remains current and fit for purpose.

What has been achieved?

There are two elements to this, updates resulting from statutory changes and modifications that address the current needs of the Council and potential improvements. The route to a decision will vary according to the context.. A review of the Officers section will require further work and consultation along with updates to the Delegation Plan elements

Next steps

Contribute to the review Scrutiny and complete the updating processes.

Risks

An up to date Constitution is key to the conduct of Council business and shortcomings can lead to uncertainty and delays in key decisions along with a risk of challenge

Timetable

It is anticipated that completion of this work will slip to May Council due to the pressure of other issues.

5. ELECTIONS AND ELECTORAL REGISTRATION

5.1 We will work supporting the Returning Officer and the Electoral Registration Office specifically address:

1. **Responding to the new constituency boundaries of UK elections**
2. **Elections Act 2022**
3. **Preparing for Welsh Parliament Electoral changes**

What has been achieved?

We have put in place arrangements for UK elections with Conwy and Denbigh Councils where constituency boundaries cross county boundaries. The arrangements for ID cards are in effect and the new postal voting (UK) regime became effective on 31/10/23. We have responded to the Government's White paper on the Welsh Parliament's electoral arrangements and are waiting on next steps. A comprehensive programme of work has been produced across these areas along with risk assessment arrangements which are subject to

constant monitoring. We have appointed an additional full-time officer using grant resources to support this work

Next steps

Implementing the programme of work

Risks

Failure to fulfil the requirements for elections but the risk assessment shows that there is an acceptable status to fulfil these requirements.

Timetable

In accordance with the schedule in the work programme.

5.2 We will begin the process of undertaking a statutory Community Survey collecting data, conducting initial discussions

What has been achieved?

Initial information gathering and engagement has begun

Next steps

Having received the information we will evaluate what has been received with a view to reporting to the full Council in March with Terms of reference for the review. It is also planned to undertake an electoral review in parallel and the process which will extend into the next financial year. The scope of the review will be defined as part of this process

Risks

Failure to conduct a review in accordance with the statutory requirement but the risk assessment shows that there is an acceptable status to fulfil these requirements.

Timetable

Report the first part of the project to Full Council in March 2024.

5.3 We will conduct a Polling Place Review.

What has been achieved?

Initial work of information gathering, and engagement has begun, including sending out questionnaires to assess the suitability of each polling station.

Next steps

Evaluate the information and seek expert advice through the Equality Officer on accessibility. Looking for alternative stations as needed

Risks

Stations no longer available or unsuitable, but we will find an appropriate solution for any election held. This is work which happens on an ongoing basis.

Timetable

The statutory consultation process begins in June 2024 with a report to Full Council in December 2024 to approve the outcome of the review.

6. Coroner's Support

6.1 Establish the Senior Coroner post on a permanent basis and ensure a sustainable basis.

What has been achieved?

We are currently in discussions with the Senior Coroner to identify the requirements and possible responses for the medium term. This will include a review of the budget arrangements and in particular also the costs of a lengthy inquest which can be significant.

Next steps

Agree the support arrangements for the service and how the other teams can contribute.

Risks

The Council has a statutory duty to provide staff and office resources along with locations for this service. Consensus needs to be reached on a level of resources that sustains the service.

Timetable

31 December 2023

6.2 Response to a request from North Wales Police for local authorities to finance Coroners Officers administrative posts

What has been achieved?

Held an initial discussion with Denbighshire County Council (the other relevant authority for the area) and the Senior Coroners.

Next steps

Contact North Wales Police for further details and consider them in terms of Senior Coroners' requirements.

Risks

The arrangement would see a move away from the current arrangement of funding the Coroner's service. It could open the door to fundamental changes in the regime with significant financial implications.

Risk/Service Situation

- Contribute to regional work recognising that this risk situation is subject to further review,
- Respond and incorporate changes in electoral arrangements at UK level and now with the publication of a prospective changes in devolved elections white paper .
- Police have asked to review the funding of a coroner's officer service.

8. Statutory Officers Observations

8.1 Chief Finance Officer

"I note the reference to funding the Coroner's Service, and the Finance Department will collaborate with the Legal Service to keep the matter under review. Other than that I have no comments to add from the perspective of financial propriety."

8.2 Monitoring Officer

Report Author