



# Consultation Response

FROM THE RSPCA IN WALES

## Ending homelessness: a high level action plan 2021 to 2026 November 2021

RSPCA Cymru welcomes the opportunity to respond to the Welsh Government's consultation on ending homelessness and the proposed high level action plan for 2021-2026. RSPCA Cymru has long called for the issues relevant to Wales' homeless animal owners to be addressed and for more action to be taken to ensure that vulnerable individuals are not required to choose between accessing safe and secure accommodation and keeping their pets. For many homeless animal owners, their pets are an important source of comfort, companionship and stability, and we urge the Welsh Government to consider how a focus on reducing the current barriers these individuals face could be incorporated into this plan.

**Q1.** The Action Plan is split into four key areas of focus (Partnerships, Rare, Brief and Non-recurring). Do you agree that these are the right areas of focus / themes to focus the plan around?

RSPCA Cymru agrees that the outlined areas of focus above are a pertinent choice, with the issues relating to homeless animal owners relevant to all four. RSPCA Cymru believes the Welsh Government should work in partnership with local authorities and providers of accommodation for homeless people to ensure the fear of losing pets is not providing a barrier to vulnerable individuals accessing services - and issue guidance to local authorities on the importance of referencing pets in their statutory homelessness strategies. While all local authorities are required to produce a homelessness strategy under the Housing (Wales) Act 2014, research from the RSPCA suggests no homeless strategy currently published by a local authority in Wales makes references to pets or animal welfare at all. We urge the Welsh Government to work with local authorities to rectify this as a matter of priority as part of the proposed plan for 2021-2026; ensuring that the specific challenges faced by homeless people with pets are a consideration for Wales' 22 councils..

It is estimated that up to 10% of the UK's homeless population have pets<sup>1</sup>, with dogs being the most common animal. Many pet owners often find themselves facing significant changing economic, social or personal circumstances, with there being a significant reliance on the charitable sector to provide support for those who find themselves without any accommodation because they are fleeing abuse or experiencing mental health issues, for example. We urge the Welsh Government to help these individuals and their animals as part of this plan to combat homelessness by facilitating collaboration between animal and human welfare agencies and working to ensure low cost veterinary treatment is available throughout Wales for those who find themselves in hardship. The Welsh Government should also increase awareness of, and support for, pet fostering schemes, and urge local authorities and local health boards to include within their statutory local strategies an emphasis on helping pets within insecure domestic settings.

<sup>1</sup> <https://www.tandfonline.com/doi/full/10.1080/10530789.2020.1754602>

We also encourage the Welsh Government to consider how working proactively with organisations who run and provide hostels and other types of shelters could help reduce the number of homeless animal owners in Wales. The most up-to-date statistics from Welsh Government suggest that approximately 12,000 households can be owed a duty to help secure accommodation at one time<sup>2</sup>, with this potentially including hundreds of pet owners. However, most homeless shelters operate a 'no-dogs policy', with only eight hostels in Wales currently operating a dog-friendly policy<sup>3</sup>. During a debate in the Senedd in October 2019, it was estimated that eighteen of Wales' 22 local authorities have no dog-friendly hostels at all<sup>4</sup>. Working with charities and others who provide accommodation for homeless people to ensure that more hostels and other types of shelters are pet-friendly would help improve the accommodation prospects of homeless animal owners, while ensuring the safety of both the owners and their animals.

Ensuring that there is an adequate provision of available pet-friendly hostels and other types of accommodation, including social and private rental properties, could also help ensure that instances of homelessness for animal owners are rare, brief and non-recurring. It is estimated that only 7% of private landlords advertise pet-friendly properties<sup>5</sup>. Because of this, a review of the current rules and regulations surrounding the keeping of pets in sheltered, social and private rented housing would be a worthy focus of the Welsh Government's homelessness strategy for the next five years. Keeping companion animals in such settings can pose many challenges to tenants, who may find themselves forced to choose between keeping their companion animals or accessing accommodation, which could lead to them becoming homeless if they are unwilling to give up their pet. The development of a well-enforced Pets Policy could ensure that more tenants are able to keep pets in a responsible manner and help to reduce homelessness, while facilitating happier, healthier tenants and more harmonious relationships between pet-owners and non-pet owners. Issuing model tenancy proposals to local authorities, housing associations and private landlords that make allowing pets a legal default, unless there is justifiable reason not to do so, as the UK Government have done in England<sup>6</sup>, could also help benefit animal owners and their pets, while making the acquisition of long-term accommodation for homeless animal owners more achievable. This could prove especially relevant to the Welsh Government's focus on the prevention of homelessness by making sure that people faced with the initial anxieties relating to homelessness are not also faced with the prospect of having to give up their pets.

While it has been suggested that there is the potential for allowing pets as a default in rented accommodation to be included as an additional term of the Renting Homes Act 2016, RSPCA Cymru is concerned that explanatory guidance relevant to this legislation states that "additional terms are agreed between the landlord and contract holder"<sup>7</sup> - which suggests that landlords can still refuse pets should they wish to do so. Because of this we urge the Welsh Government to ensure that additional terms cannot be used as a means for landlords to introduce a blanket ban on pets without justifiable reason.

**Q2** Do the actions in the Action Plan reflect the most effective high level steps that will enable the Welsh Government and its partners to end homelessness in Wales?

**Q4** We have developed a number of key actions and milestones. Do you feel these are the right ones?

**Q5** Do you think there are any key areas for action not captured by the high level actions? If so, what would they be?

While there are many effective high level steps outlined in the current version of the action plan which could be applied to homeless animal owners such as 'offering a package of assistance and multi-agency

<sup>2</sup> <https://gov.wales/homelessness-april-2019-march-2020>

<sup>3</sup> <https://record.assembly.wales/Plenary/5852>

<sup>4</sup> <https://record.assembly.wales/Plenary/5852>

<sup>5</sup> <https://www.mirror.co.uk/money/law-change-means-landlords-can-23407724>

<sup>6</sup> UK Government - New standard tenancy agreement to help renters with well behaved pets, 28 January 2021

<sup>7</sup> <https://gov.wales/sites/default/files/consultations/2021-03/consulation-document.pdf>

support, specially tailored to individual needs where this is required' amongst others, as it stands there is no mention of homeless animal owners or how to reduce the specific barriers these individuals face within plan. Without the inclusion of specific measures that are tailored to meet the individual needs of homeless pet owners, RSPCA Cymru can only partially agree with the current plan reflecting the most effective high level steps to end homelessness in Wales.

RSPCA Cymru encourages the Welsh Government to consider the inclusion of key actions and milestones that aim to reduce the number of homeless pet owners within this plan, such as the facilitation of more pet-friendly properties in Wales, for example. This should cover sheltered, social and private rented accommodation and should see the Welsh Government taking proactive measures to ensure that there are less challenges for pet owners who are seeking these properties. We encourage the inclusion of a key action/milestone that specifically aims to collate relevant data and reduce the number of people who are homeless because they cannot keep their pets otherwise; and to undertake research to discover how many individuals this actually applies to. As it stands, there is little data available relating to how many of Wales' homeless people are pet owners, with the real figure potentially higher than the estimated 10% quoted above.

RSPCA Cymru was one of the six charities who previously worked with Jack Sargeant MS on the creation of a Pet Friendly 'Paw-licy' for Wales. Various recommendations were featured in the report submitted to Welsh Government late last year, and we urge them to be given due consideration. The recommendations below could be included as key areas for action within this plan to end homelessness and could contribute towards achieving the plan's aims, while reinforcing the requirements of the Well-being of Future Generations Act.

- Facilitating the provision of pet friendly accommodation and associated support throughout housing pathways/journeys to ensure positive and permanent resettlements
- Carrying out an audit of temporary accommodation provision and acceptance of pets to assess regional gaps and support needs for homeless pet owners in Wales
- Recruiting Pet Friendly Offices, as per Scotland, to increase accommodation and support options for pet owners by working directly with providers across all sectors to become pet friendly
- Introducing training/advice sessions for service staff on understanding the benefits of pet ownership for homeless people, of pet friendly environments and the positive impact pets can have on their client's recovery
- Highlighting the benefits of positive pet policies for tenants to social housing providers and the private rented sector in order to ensure pet friendly move on provision is available
- Issuing official government guidance to local authorities on accepting pets would help reduce regional variations between local authorities across Wales

As well as making the above recommendations, the report also call for homeless people to be supported in keeping their pets because companion animals can improve both mental and physical health, reduce loneliness and increase engagement with life-saving support services, which is particularly important given that homeless people are potentially more likely to experience multiple and complex needs such as mental ill health, drug and alcohol addiction and family breakdown<sup>8</sup>,. RSPCA Cymru fully supports this sentiment and calls for this to be reflected within the Welsh Government's high level action plan on homelessness for the next five years and for the recommendations above to be incorporated within the plan as part of this acknowledgement.

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<sup>8</sup> <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/health-and-wellbeing/>