



# Consultation response

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## White Paper on Ending Homelessness in Wales

January 2024

RSPCA Cymru welcomes the opportunity to respond to the Welsh Government's [consultation](#) on the White Paper on Ending Homelessness in Wales. RSPCA Cymru has long called for action to be taken by the Welsh Government in order to address the issues relevant to Wales' homeless pet owners, with both homelessness and companion animal ownership currently on the rise. For many homeless pet owners, their animals are a vital source of comfort and companionship while providing them with a sense of purpose and routine. We therefore believe it is imperative that vulnerable animal owners in Wales are not forced into situations where they may be required to choose between accessing safe and secure accommodation or keeping their pets.

According to the most recent statistics from the Welsh Government, at least 12,537 households were assessed as homeless between 2022-2023 - marking an increase of 7% on 2021-2022<sup>1</sup>. Companion animal ownership is not uncommon across the homeless community, with estimates from the Center for Homelessness Impact suggesting that as many as a quarter of homeless people have pets<sup>2</sup>. With the number of homeless households having increased in Wales, it is likely that this corresponds with a rise in the number of homeless pet owners too.

Positively, the aforementioned White Paper makes a number of specific references to pet ownership - marking a significant improvement in comparison to previous plans and strategies to address homelessness in Wales. Proposals to include a statutory duty to include an applicant's views on their accommodation needs in their Personal Housing Plans (PHPs) - such as being accommodated with their pets (84 - page 31) - are very much welcome. The White Paper also makes reference to achieving 'a more person-centred system which is better able to take account of individual needs and how meeting or not meeting these needs might impact a person's health and wellbeing'. Being accommodated with a pet is among the examples provided (508 - page 130), which is highly encouraging. No pet policies are also recognised as a barrier to accessing social housing in chapter 4 (594 - page 150), demonstrating a significant step forward in terms of recognising the challenges faced by homeless pet owners in Wales.

For the purposes of this response, we will focus on the proposals above while outlining what further action we believe could be taken to reduce the current barriers facing homeless pet owners. Such action could reduce the number of people who find themselves faced with having to give up their companion animals to access accommodation, while also protecting and improving both human and animal welfare.

### [Chapter 1: Reform of existing core homelessness legislation](#)

#### **Proposed changes: A statutory duty to draw up a PHP containing the steps the local housing authority will take to secure accommodation for the applicant (84)**

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<sup>1</sup> <https://www.gov.wales/homelessness-april-2022-march-2023>

<sup>2</sup> <https://www.homelessnessimpact.org/news/unleashing-hope-the-power-of-dog-ownership-for-people-experiencing-homelessness>

With Chapter 1 proposing the creation of a statutory duty that would require local authorities to draw up Personal Housing Plans (PHPs) which take an applicant's views into account, RSPCA Cymru agrees that this proposal could benefit Wales' homeless pet owners. Considering and accommodating an applicant's views in their PHPs, such as their desire to be accommodated with their pets, could see them access the support they need while keeping their companion animals with this having the potential to lead to more successful and/or longer-term housing arrangements. Allowing an applicant to make such requests would also provide the Welsh Government and the relevant support services with a more reliable estimate of the number of homeless pet owners in Wales along with a better idea of their specific needs. Dog ownership is particularly common among the homeless, providing many with a number of physical, mental and social benefits. Dog ownership has also been shown to assist with mental health issues by providing a form of emotional support to owners, while helping some members of the homeless community to facilitate routines<sup>3</sup>. Positively, the integral mental health and well-being benefits of pet ownership among the homeless are noted on page 31 of the White Paper.

To reduce the barriers faced by homeless pet owners - and to ensure the proposal above has the desired effect - RSPCA Cymru believes that the Welsh Government should work in partnership with local authorities and other providers of accommodation to secure the provision of more pet-friendly accommodation and support services. While up to 25% of the homeless population could be considered pet owners, it is estimated that less than 10% of hostels accept pets into their facilities<sup>4</sup>. Previous estimates suggest that there are only eight hostels in Wales that are currently listed as allowing pets, with 19/22 local authorities having no dog-friendly hostels at all<sup>5</sup>. Being forced to choose between accessing accommodation or keeping their companion animals could place already vulnerable individuals in further distress while preventing them from accessing much-needed help and support. It is therefore important that more accommodation is made available for homeless pet owners and their animals. This could be achieved through incentivising and encouraging current providers of accommodation to adopt flexible approaches so that more space is made available for members of the homeless community and their animals. Carrying out an audit of temporary accommodation provision and the acceptance of pets to assess regional gaps and support needs for homeless pet owners could also help the Welsh Government gain a better insight into the availability of pet-friendly accommodation and how this could be improved.

While the proposed legislative change outlined above could lead to significant improvements, if it is to be effective, it is important that local housing authorities have the resources and knowledge in place to aid vulnerable people with animals. While all local authorities are required to produce a homelessness strategy under the Housing (Wales) Act 2014, previous 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. RSPCA Cymru therefore urges the Welsh Government to undertake a proactive approach by working with local housing authorities, as well as organisations that run and provide hostels and other housing alternatives, to ensure that the specific needs of homeless pet owners are taken into account and recognised in their relevant strategies. Issuing these organisations with specific training, support and guidance relevant to this demographic could help promote a better understanding of the issues relevant to homeless pet owners, and the importance of accommodating them, while also improving the safety of the owners and their animals.

#### **Chapter 4: Access to accommodation**

**We propose to introduce a requirement that these personal circumstances must be given consideration in assessing suitability of accommodation, even if it is not possible at the time of the assessment to meet all of those needs through accommodation placement.**

**594: We propose to introduce legislation to require the use of Common Housing Registers (CHRs) and common allocations policies across all local authorities in Wales.**

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<sup>3</sup> University of Bristol - "A Part of Me." The Value of Dogs to Homeless Owners and the Implications for Dog Welfare

<sup>4</sup> <https://www.dogstrusthopeproject.org.uk/welcoming-dogs-scheme/about-our-welcoming-dogs-scheme>

<sup>5</sup> <https://record.assembly.wales/Plenary/5852#A53686>

Within Chapter 4 of the White Paper, the Welsh Government makes reference to ‘building choice into the system’ with ‘being accommodated with a pet’ listed as an example of a need that could impact a person’s health and wellbeing if not met. RSPCA Cymru welcomes the proposal to require local authorities to take the personal circumstances of homeless individuals into consideration, with this having the potential to include pet ownership. With the availability of hostels and other types of accommodation that accept pets likely to be scarce, it is important that this issue is addressed so that local authorities are able to meet the needs of homeless pet owners. The creation of specific spaces for pet owners and/or requiring more flexibility from current providers in terms of pets would enable local authorities to better meet the needs of this demographic through accommodation placement. Requiring local authorities to provide associated support throughout housing pathways/journeys as outlined in Chapter 1 could also help ensure positive and more permanent resettlements.

The use of Common Housing Registers and allocation policies via legislation could help more homeless pet owners access social accommodation although it is vital that pet ownership is no longer seen as a barrier to accessing such housing. Introducing registers which clearly note whether an applicant has pets or not could make it easier for providers to match those with companion animals with suitable housing. Working with housing associations and other providers of social housing by providing them the tools and guidance needed to meet the needs of homeless pet owners would also contribute to a better understanding of their specific needs. Regardless of the type of accommodation a homeless pet owner is trying to access, it is vital that vulnerable individuals who benefit from their companion animals are not discriminated against for having a pet.

### **Further proposals**

As well as working with local authorities, charities and other providers of temporary accommodation to ensure the provision of more pet-friendly services, a change in legislation relevant to the private rental sector could also benefit Wales’ homeless pet owners. As it stands, many pet owners struggle to access private rented accommodation in Wales due to the prevalence of ‘no pets’ policies, leaving previously homeless pet owners with few options in terms of move-on accommodation. While the legality of such policies is questionable, they remain common nonetheless. We therefore continue to encourage the Welsh Government to introduce its own ban on ‘no pets’ clauses and to consider making the keeping of pets in private accommodation a legal default - unless there is justifiable reason not to. The introduction of a standard tenancy agreement which allows pets could also improve the current situation, along with tighter measures that ensure responsible pet owners are not treated unfairly as a consequence of the type of accommodation they live in.

Positively, the Senedd’s Local Government and Housing Committee is due to hold an enquiry into the keeping of pets in the private rented sector in the first quarter of 2024. RSPCA Cymru is among the organisations who are due to submit evidence to the committee, with it hoped that this will pave the way for much-needed improvements.

### **Conclusion**

RSPCA Cymru strongly welcomes the specific references to pet ownership that are made within the White Paper on Ending Homelessness in Wales along with the proposals that could benefit homeless pet owners. It is our view that this marks a significant step forward in terms of recognising the need to address the specific needs of homeless pet owners, with this being something we have long called for. To enable the proposals above to have the desired effect, it is vital that more accommodation - both temporary and longer-term - is made available for homeless pet owners and that service providers receive the guidance, training and resources needed to meet the needs of this demographic. The Welsh Government has a vital role in terms of de-stigmatising homeless pet owners and ensuring that the relevant support is available to them. With the number of homeless pet owners having the potential to increase again as a result of the ongoing cost-of-living crisis and further cuts to services and budgets, it is important that imminent provisions are put in place to ensure that the relevant support is in place for the homeless community, including those that benefit from pet ownership.