



promoting equality in housing  
hybu cydraddoldeb ym maes tai

## Tai Pawb

### Response to:

*Strategic Equality Objectives 2020-2024 (Welsh Government)*

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## Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's purpose is, "To Inspire Wales to be a Fairer Place to Live" with a mission to promote equality and social justice in housing in Wales. It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

## What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector.

For further information visit: [www.taipawb.org](http://www.taipawb.org)

Charity registration no. 1110078

Company No. 5282554

## 1. Introduction

Tai Pawb welcomes the opportunity to respond to the draft Welsh Government Equality Objectives. We are currently operating in an unprecedented equality landscape, posing multiple and complex challenges to the equality agenda and to the vision and goals of the Welsh Government as outlined in the document. The Welsh Government is right in reviewing its strategic, policy and legislative approach to tackling inequality, including the proposed introduction of socio-economic duty, the review of PSED and the consideration of further incorporation of human rights treaties into Welsh law.

The many challenges outlined in the consultation document, including austerity, welfare reform and poverty are inextricably linked to and further exacerbate the symptoms of housing and homelessness crisis as experienced by the people of Wales. Consequently the housing crisis affects people with certain protected characteristics and those living in poverty much more than others and in certain cases leads to human rights breaches, so starkly illustrated by the tragedy of Grenfell and the sharp increase in the numbers of rough sleepers.

Our key asks and suggestions for inclusion in Welsh Government Equality Objectives are related to the barriers, inequalities and human rights breaches linked to housing and can be summarised as follows:

- Fully Incorporate The Right to Adequate Housing into Welsh legislation
- Increase the provision of accessible housing for disabled people
- Support the development of temporary housing options of refugees during the move-on period
- Work with the EHRC to strengthen the monitoring of public sector compliance with the equality duties including using the government regulatory powers
- Strongly encourage better equality evidence collection, analysis and use
- Work with the EHRC to replace the use of Equality Impact Assessments with a much more simple and outcome focused duty.

- Better use of foundational economy approaches and procurement to advance equality
- Encourage better integration of mental health and housing services

## **2. Do you agree with the proposed draft Equality Objectives in Chapter 5?**

We agree with most objectives. Objective 7 refers to a development of a monitoring framework – whilst we understand the importance of monitoring frameworks, it seems that 4 years is a long time to devote to this objective. This objective is also not outcome focused. Perhaps reference to the community cohesion goals, supported by a monitoring framework to be developed, would be better here.

In relation to Objective 2, we would like to draw your attention to the [Right to Adequate Housing in Wales Feasibility Report](#) written by Dr Simon Hoffman for Tai Pawb, CIH Cymru and Shelter Cymru. The report not only makes the case for the incorporation of the right to housing into Welsh law but also sets out a route on how to get there. This route could be considered for adoption by Welsh Government when it considers the incorporation of other rights.

We would also suggest that this objective, in one of the corresponding actions, could put on paper the commitment that the Housing and Local Government Minister, Julie James, made to enacting a due regard to the right to adequate housing into the Local Government Bill.

Whilst this is a very welcome move from the Welsh Government (and it should be strengthened by being put on the face of the bill), the campaign for the right to housing sees it as only the first step towards a full incorporation.

<https://record.assembly.wales/Plenary/6043>

We would recommend that objective 1, relating to poverty, should look at homelessness as a specific area (under EHRC domain of living standards). Within that, this objective should include support for the development of temporary housing options of refugees during the move-on period. We have produced a specific [Refugee Housing and Support Feasibility Study](#) about this and created a working group of housing associations willing to address this need but we have identified the need for this work to be supported by Welsh Government.

We believe that under Objective 3 – Welsh Government could work with the EHRC to strengthen the monitoring of public sector compliance with the equality duties including using the government regulatory powers. An example of using regulatory powers to monitor compliance is the work of Housing Regulator (part of Welsh Government housing department). Housing regulator requires for example that equality impact assessments are carried out and that equality data is used as per the equality act. The regulator also places particular importance on the role of housing association boards and governance systems in providing leadership and scrutiny on equality issues.

We would also suggest the Welsh Government uses all possible levers to strongly encourage and where possible require better collection and more importantly use of equality data to inform advancement of equality of opportunity in the development and review of public services. We would support a wide stakeholder consensus that whilst equality data is collected (although there are serious weaknesses there), it is actually rarely used by public services to assess fairness and to feed into service improvement and business development strategies. Tai Pawb comes across this trend often in the course of our QED work, with real improvements made by the organisations we accredit. We are also working with Homelessness Networks to address weaknesses in the use of equality data by homelessness services and teams ([as identified by Wales Audit Office in their homelessness review](#)).

As part of this objective, we would also recommend that Welsh Government works with the EHRC replace the specific duty to carry out Equality Impact Assessments with a much more simple and outcome focused duty. Equality Impact Assessment processes are currently too complex and therefore treated as box ticking exercises (or not used at all). All too often they also consist of a retrospective process of looking for broad research evidence which is confirmatory of the positive impact of proposed changes for example, rather than genuine looking at available equality data on the specific service/function, engagement with service users/equality experts and a genuine business improvement process resulting in advancing equality. Guidance on EIA's available from the EHRC is also far too complex.

When EIA's are used in court processes – the court verifies whether an EIA was conducted, not whether the listed authority actually looked at objective evidence of impact. All too often organisations carry out an EIA of “a policy” – assuming the policy represents practice, rather than an EIA of the impact of the policy – i.e. the actual practice in the organisation.

### **3. Do you think there are any areas of inequality that are not addressed by draft Equality Objectives and that are of particular importance to you?**

There does not seem to be an objective which would encompass access to and accessibility of various services. The need for such an objective seems to be highlighted in the engagement evidence presented in the document. We would strongly support such an objective.

Such an objective could include an action/focus on increasing the provision of accessible housing for disabled people, as per the commitments included in Action on Disability Framework. Accessible housing crisis is well documented and acknowledged by the Welsh Government therefore we will not be referring to this well known evidence here again. In our opinion the actions should focus on:

- Bulding more homes to Lifetime homes Standard and Wheelchair Accessible Standard. This should be driven by better collection and use of accessible housing need data for LHMA's and LDP's), specific local and national targets for wheelchair accessible housing (e.g. in London, Planning Policy requires 10% of all new housing to be built to wheelchair accessible standards) and equalising private built accessibility standards with those of social housing which is Lifetime homes compatible.
- Better allocation of accessible or already adapted social homes.
- Better adaptations system which is equitable to all disabled people irrespective of housing tenure.

#### **4. Are there any emerging trends / issues / evidence regarding inequality in Wales that you feel should be addressed as a priority?**

With the growing body of work and support for foundational economy from the Welsh Government – not including better advancement of specific equality issues in foundational economy approaches, would be a missed opportunity. This includes better targeting of social value and community benefits initiatives at specific groups (for example targeted employment and training clauses in procurement contracts) and businesses which advance equality.