

Welsh Government Consultation Draft Disabled People's Rights Plan Crisis response August 2025



About Crisis

Crisis is the national charity for people facing homelessness across Wales, Scotland and England. We know that homelessness is not inevitable, and we know that together, we can end it.

Our South Wales Skylight based in Swansea provides direct one-to-one support to people who are at risk of or experiencing homelessness. We help our members find safe and affordable homes and support with accessing benefits, healthcare services and employment opportunities. We also offer a range of learning, social and wellbeing opportunities.

Our Best Practice team works with local authorities, third sector partners, businesses and other organisations on a range of homelessness projects across Wales and Great Britain to identify, test and promote ways of ending homelessness.

Our Wales Policy team works closely with Members of the Senedd from all parties, contributes to working groups and advisory groups, responds to consultations and calls for evidence, and connects with policy teams in other organisations in Wales. In 2022-23, Crisis was proud to be invited to convene the [Expert Review Panel](#), looking at how legislative change can help to end homelessness in Wales.

We are passionate about working collaboratively across the sector to seek positive policy solutions to help end homelessness in Wales.

About this response

This response has been written by the Crisis Wales Policy team. It focusses on the aspects of the plan with relevance to accessible and affordable housing, responding in particular to Consultation Questions 4 and 5.

Crisis response

Overarching view

Crisis welcomes the publication of this draft plan. We know that disabled people are at disproportionate risk of homelessness, and it is vitally important that this is addressed.

Connection with the Homelessness and Social Housing Allocations Bill

Crisis welcomes the content of the plan in relation to housing, but would suggest that the final version of this plan could be improved with more connection to the

Homelessness and Social Housing Allocations Bill which is currently going through the Senedd's legislative process.

Some of the proposals in the draft Homelessness and Social Housing Allocations Bill are particularly relevant to disabled people's rights and, if implemented effectively, would help to contribute to achieving the ambitions and outcomes within the housing section of this plan. It will therefore be important to ensure that the effective implementation of these proposals connect with actions within the Disabled People's Rights Plan.

The proposals within the draft Homelessness and Social Housing Allocations Bill that we feel are relevant to disabled people's rights include but are not limited to:

- Requirement for Prevention, Support and Accommodation Plans to take account of homelessness applicants' access needs, including their communication preferences for engaging with housing services and the suitability of accommodation they are offered by housing services.

Crisis considers that it would be helpful to reference this within the new training for housing organisations, which the action plan seeks to deliver.

- Requirement for social landlords to hold accessible housing registers, as recommended by the Equality and Human Rights Commission¹ and the Expert Review Panel.²

Crisis welcomes this proposal and believes it is an integral part of meeting the taskforce's recommendation around understanding the gaps in housing for disabled people. It will be vital that disability groups are involved in establishing the detail around the accessible housing register proposals, recognising that 'accessible' is not a catch all term and disabled people are not a homogenous group. A property that is accessible to one disabled person may not be accessible to another. Accessible housing registers must contain detail about which features of the property are considered accessible so as to appropriately match an individual to a property accessible to them.

- Improvements to requirements for public services and social landlords to co-operate with each other when a person is receiving support from more than one of these services.

Crisis believes these new duties could help to break down barriers for disabled people receiving support from housing and other services. It is

¹ [housing-and-disabled-people-wales-hidden-crisis-executive-summary.pdf](#)

² [ending-homelessness-in-wales-a-legislative-review.pdf](#)

important that, as the detail is established around how these duties will operate, particular consideration is given to disabled groups.

Responses to questions

Question 4: The 'actions document' sets out the short-term steps we are taking now. There will be more actions by future governments to support us to achieve the long-term outcomes.

Please tell us whether you think these short-term actions will help deliver the long-term outcomes? Will these actions help reduce the problems and barriers that disabled people face? Please give reasons for your answer if possible.

We are supportive of the accessible and affordable housing actions outlined and feel they will contribute to the delivery of the long-term outcomes; however, we would suggest the following areas might also be considered for additional actions:

- Continue to secure a path towards a right to adequate housing in Wales. Disabled people should be engaged with this process to ensure that legislation in this space reflects the needs of disabled people.
- Improvement of data on the needs of disabled people in relation to housing.
- Considering how accessible housing might be improved through existing structures. For example, through looking at how accessible housing factors into planning systems, the monitoring of adherence to accessible housing regulations and reviewing the standards in the Welsh Housing Quality Standard.

As mentioned above, we also believe that implementation of the Homelessness and Social Housing Allocations Bill will be key to achieving the long-term outcomes. Crisis is keen to ensure that the aims of the disability taskforce connect to the relevant aspects of the Bill.

Question 5: Will the proposed outcomes set out in 'Neighbourhoods and Places' help reduce the problems and barriers that disabled people face? What, if anything, should be added or removed from these outcomes? Please give reasons for your answer if possible

We are supportive of the Housing Outcomes aligned in the 'Neighbourhoods and Places' part of the plan and feel that they will help reduce the problems and barriers that disabled people face in accessing affordable and accessible housing.

Further information

Thank you for taking the time to consider this response. For further information, please do not hesitate to contact Jasmine Harris, Senior Policy and Public Affairs Officer, Wales: Jasmine.Harris@crisis.org.uk