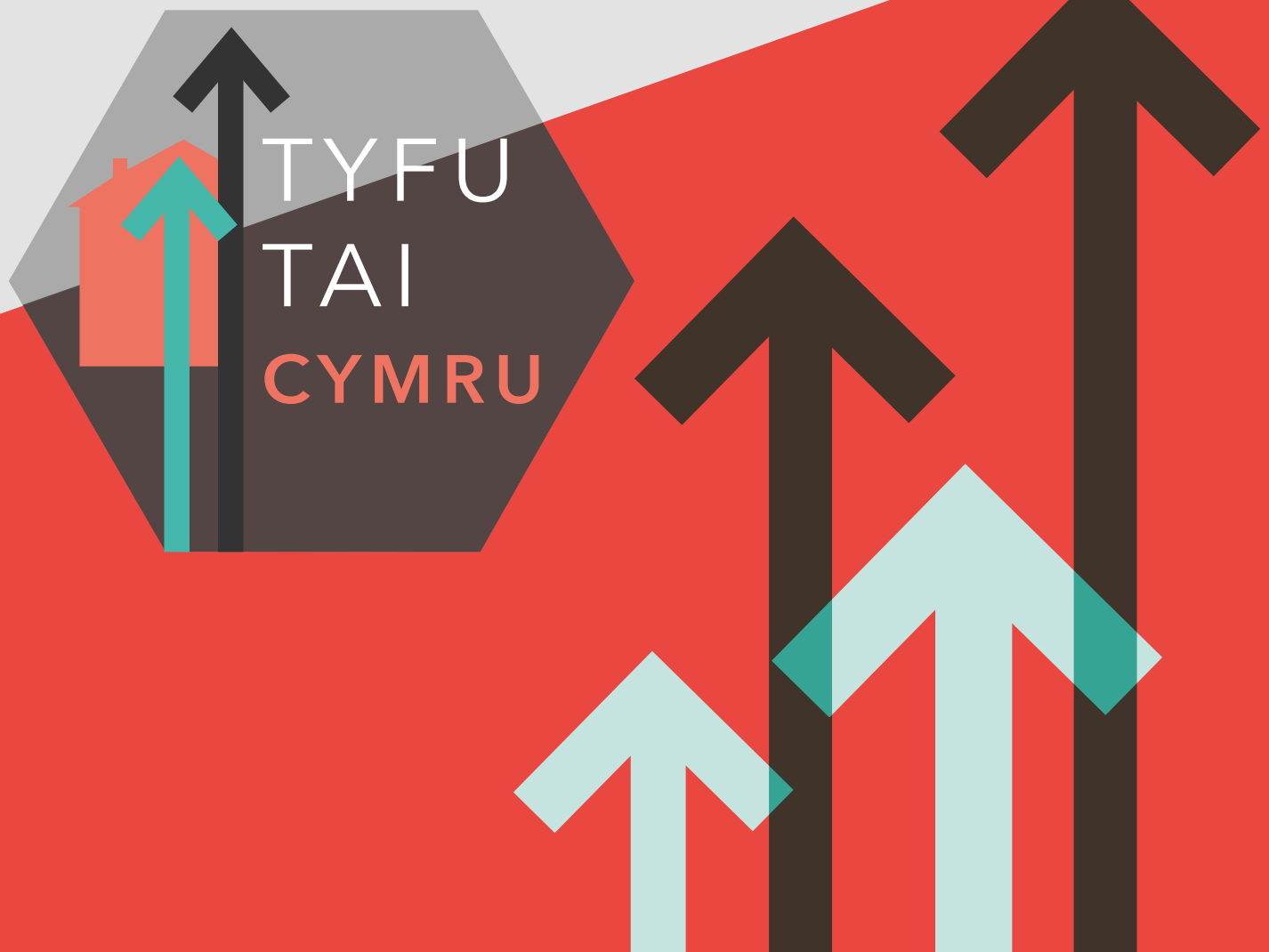




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Time to re-focus?

A review of the allocation of social rented housing in Wales within the context of COVID-19
by Joy Kent and Elin Brock





1. What is this report about?

Wales has thousands more people wanting social rented housing than we have available and unless we increase the supply significantly, this situation is unlikely to change.

Within this context, when deciding who is allocated a social home, housing providers have to balance a range of sometimes competing issues: preventing and tackling homelessness, providing choice, making the best use of housing and promoting tenancy sustainment.

Many of the issues facing people responsible for allocating social housing are long-standing and unsurprisingly, predominantly within a framework formed by housing legislation and policy. Yet the context in which decisions are made is not only complex but often requires responding to issues beyond the reach of housing legislation. The actions taken after the floods and the Coronavirus (COVID-19) pandemic and subsequent lockdown during 2020 have shown how the housing sector can react in extraordinary circumstances.

This report sets out the different approaches developed in Wales to the allocation of social housing. The research underpinning it was carried out after the widespread flooding in February and before COVID-19 pandemic impacted on the delivery of a range of housing services - including how and to whom social housing is allocated. We are encouraging decision-makers to learn from the upheaval of 2020 and evaluate the extent to which the system we used to house over 10,000 people last year is working. We ask what could be improved so that as a sector, we are better prepared for an uncertain future.

It is divided into three sections:

- the first looks at what is in place currently,
- the second sets out issues with the current situation we have identified through our research
- the final section suggests how we could shape the policies and practices in housing allocations to better fit the needs of the population in this new environment

Terms and abbreviations

Social housing: rented housing offered by local authorities and housing associations which has generally been developed with some form of public subsidy and is offered at below market rents.

Allocation scheme: The way a local authority determines priority and the procedures they will follow when allocating social rented housing, in accordance with relevant legislation and guidance.

Common housing register: a joint waiting list for housing provided by the local authority and any partner housing associations.

Common allocations policy: a joint policy that sets out the criteria and process for accessing housing from the local authority and partner housing associations.

Priority need/status: groups of people who are considered to have a higher priority for housing within Welsh legislation.

Reasonable preference: the requirement set out in legislation that local authorities must prioritise those people who are most in need of housing.

Banding system: an approach to prioritising applications for housing through bands with specific criteria.



Points-based system: an approach to prioritising applications for housing by awarding points for specific circumstances/criteria.

Choice-based lettings: an approach to lettings that requires people to bid for properties they are interested in. Normally combined with a points-based or banding system to prioritise applications.

Housing needs assessment: A process a local authority carries out to assess what the current and future housing needs in the area are.

Social Housing Grant: The funding provided by Welsh Government which subsidises the building of social rented housing

Housing co-op or cooperative housing: A housing unit that is owned and controlled jointly by a group of individuals who have equal shares, membership, and/or occupancy rights to the housing.

Community Land Trust: Community land trusts (CLTs) are set up and run by local people to develop and manage homes and act as long-term stewards of housing.

PRS - private rented sector

LA - local authority

HA - housing association

WG - Welsh Government

Scale of the challenge 2018/19:

- 60,000 people registered on LA waiting lists
- 12,863 households provided with housing
- 30% of allocations to households considered homeless
- 4,000 empty homes across LA and HA stock

Sources:

<https://statswales.gov.wales/Catalogue/Housing/Affordable-Housing/Provision/additionalaffordablehousingprovision-by-provider-housingtype>

<https://statswales.gov.wales/Catalogue/Housing/Social-Housing-Vacancies/vacancies-by-area-availability-duration>

What did we do?

We approached this work by:

- reviewing all local authority (LA) websites to understand what allocation processes were used across Wales and what someone approaching a LA via their website would find.
- contacting all LAs to check our understanding and pose generic and specific questions based on what we'd read. We also invited them to contribute further to the research.
- engaging people who had tried to access social housing through LAs, HAs and partner organisations to understand their experiences and perspectives.
- inviting input from housing professionals via social media.
- engaging with partner organisations from the HA sector, homelessness/support sectors and organisations working in policy development to understand their experiences and perspectives.
- considering other research and policy work in this area which we felt could inform our conclusions and recommendations.





2. How does the system work now?

Defining housing need and homelessness is central to housing allocation policy and legislation and agreeing definitions has become increasingly complex and opaque.

During the COVID-19 lockdown, how social landlords allocated a home changed but under normal circumstances allocating social housing is a complex and challenging balancing act. In developing allocation schemes, each Local Authority decides, depending on local housing conditions, how they discharge their functions under the Housing Act 1996, Part 2 of the Housing (Wales) Act 2014 and also have due regard to the relevant Code and good practice.

The Welsh Government's Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness (March 2016), recognises this balancing act inherent in allocation processes between:

- the needs and preferences of applicants;
- the well-being of existing tenants;
- the community as a whole;
- and the need to make best use of a publicly funded resource to meet housing need, particularly for those in greatest need where owner occupation or private rented accommodation are not accessible or sustainable.

From our review of websites and the subsequent interviews with LA staff operating allocation policies, it is clear that the approaches adopted try to meet a range of objectives including:

- acting in line with housing policy and legislation;
- being fair and transparent;
- providing choice;
- making best use of the housing stock;

- creating sustainable, mixed communities;
- meeting the housing needs of people in different circumstances;
- preventing and responding to homelessness, and
- establishing sustainable tenancies.

Our review of allocation schemes currently in place showed that a range of approaches have been developed to meet this legislative context and address local housing need.

Across Wales:

- 19 LAs use common housing registers (CHRs) of which:
 - 18 use banding systems to allocate and 1 uses a points-based system;
 - 7 combine the common banding system with using choice-based lettings (CBL); and
 - 3 are part of a regional CHR.
- 3 LAs don't have a CHR of which:
 - 1 has transferred its stock. The transfer organisation uses a banding system and CBL. The LA advises people to contact the other HAs operating in the area directly; and
 - The other 2 LAs have their own stock and each social landlord operating in the area has their own scheme.

Where HAs are not part of a CHR or scheme, a range of approaches are used to allocate housing by the social landlords operating in that area.



All schemes reviewed for this project allowed for allocations outside the generally used approach in specific circumstances and with the agreement of partners. This includes:

- Local lettings policies in rural communities
- Meeting the needs of people in specific circumstances or with particular requirements, e.g. older people, support needs, adapted housing
- Short term local lettings for new developments to support a new community getting established.

What did people managing allocations tell us?

In trying to understand how LAs are normally grappling with balancing a number of priorities, it was important that we spoke to those people who are responsible for managing them. Of the 11 LAs that responded to our survey, all of them recognised benefits and drawbacks in the scheme they used.

Common Housing Registers

Responses suggested that having a common housing register (CHR) provides a range of benefits for the person needing housing, the LA's delivery of its strategic role and for social landlords alike:

- For the prospective tenant one application process and point of contact means greater transparency and less time required to navigate the system.
- For the LA they are able to meet their strategic function for data collection, understand their local context and meet other statutory obligations.
- For social landlords, it was felt that it contributed positively to effective partnership working and maximising a collaborative approach to the achievement of shared goals.

Where there is a common housing register in place, partners need to be able to work proactively and effectively together to achieve joint objectives. While not without challenges staff from LAs told us that working with a CHR promoted better relationships and collaboration with their HA partners:

'The partnership works very well and our partner landlords are very well engaged in delivering the common register. We have an agreement with our partners that they advertise their properties via the Common Housing Register and these are advertised in accordance with our common policy. Aside from the stock transfer agreement, we have an agreed lettings plan with all of our RSL partners which helps to determine allocations to priority groups (enabling the Council to discharge its duties to households in housing need).'

There are three LA areas of Wales that don't have a common housing register. We understand at least one of these is reviewing this. Although no system is perfect and there are reasons why both the LA and HA partners might want to protect the flexibility provided by having their own scheme, it's difficult to see how these concerns aren't outweighed by the benefits summarised above - particularly the added pressure on people needing housing who have to deal with a number of social landlords at the same time.

Choice-based Lettings

Those LA and HA partners that have adopted a choice-based lettings (CBL) approach were positive about its impact for people looking for housing, social landlords and partner relationships. They were aware of some challenges, particularly in administering the system, but felt that these could be mitigated through updating IT systems and digital delivery. They told us:

'When we adopted a CBL, we immediately saw increased income with properties turned around quicker.'



'Choice based lettings remains our system for allocating social housing because we feel this better promotes choice, helps us locally to increase interest in properties and areas of lower demand, reduces waste in the system/ officer time and is more open and transparent to better inform applicants on the availability of homes and the high demand for them.'

Some respondents identified issues with CBL and outlined how they responded:

'Because of supply issues, we limit the number of bids customers can have'

'people are sometimes confused by the adverts - they don't understand them'

'when we reviewed what we were doing we realised that we thought people knew they had to bid but a lot didn't. We are looking at how we can improve the process - make it more personalised for the people who need that.'

Others highlighted challenges they felt existed in their use of CBL in relation to responding to households accepted as homeless. In a number of cases auto-bidding is used which was seen positively as widening out options but also concern that it limited choice. Others highlighted the issue that having essentially two groups of people who are responded to differently - those accepted as homeless and others who are in housing need - has its drawbacks:

'It encourages people to become homeless/ be housed in temporary accommodation to be awarded Gold / Gold Plus banding.'

'The banding prioritises highest housing need (i.e. homeless in temporary accommodation) but due to the lack of affordable housing (including social housing) we struggle to offer properties to other applicants with lower banding but still in housing need.'

The perspective of officers running the schemes was that banding systems are easier for people to understand than points-based systems and more straight-forward to operate.

Partnership working

Central to the success of a CHR is a positive relationship between LAs and housing partners. Participants had experienced times when partners had conflicting priorities which they needed to work through:

'We are noticing a different behaviour from some of our RSL partners in terms of the level of control they want over allocations and nominations, which was reflected in their willingness to cooperate on homelessness. A couple of our housing association partners work proactively with us to achieve great solutions but there are times when we are faced with a lack of communication and cooperation and 'territory wars' over management and allocation decision-making.'

In areas where there is a severe shortage of social housing, this can be a very challenging culture to work within. An example that was raised by a rural authority was around the difficulty they faced in identifying temporary accommodation within the social housing sector in areas where property values and the unavailability of private rented sector accommodation made meeting the needs of homeless households particularly difficult:

'In rural areas, we need to be mindful and respectful of the fact that many people are very connected to their communities. In our county, homeless applicants in the south of the county have to travel 40 miles to the nearest temporary accommodation option. Clearly this is not a feasible option for someone if they have children in the local school, family or support system locally or no transport options. We are in a difficult position of having to balance availability, cost and demand and need flexible options from our partners to ensure that they have models that support people to stay in their communities whilst being cost effective and reflective of local pressures.'



A regional approach

An example of positive partnership working is the Single Access Route To Housing (SARTH), which is a single scheme for 3 LAs in North Wales. The benefits of this approach are seen as:

- it is easier, fairer, consistent and clearer for people looking for accommodation;
- it enables participating LAs to have a better understanding of need across the region; and
- it is easier to operate for all partners and encourages stronger partnership working.

Homelessness and housing need

This is an area where responding to COVID-19 has had a huge impact. Our analysis found that under normal circumstances, the schemes used by at least 7 LAs in Wales do not place homeless applicants, or those threatened with homelessness in the highest priority banding. In some cases, LAs stated that they had created a separate band for homeless applicants and allocated quotas to each band to ensure that their needs are met.

Although this approach does allow greater flexibility in meeting a range of people's needs, Welsh Government guidance makes it clear that quotas should not interfere with providing additional priority to people in urgent housing need:

LA staff using quotas told us that they monitor the usage and some send monthly updates to housing providers to ensure that they fulfil their quota obligations. LAs noted that this can be very confusing for prospective tenants when they are told they are 'top of the list' but didn't get a home due to a quota limit. This raised a question for us around whether the needs of the system or the citizen drive how housing is allocated, and it comes into even sharper focus in light of the response to COVID-19.

One LA participant told us that the 'decision to place applicants in Band 2 was taken at a local member rather than officer level'. This gave homeless people a lower priority within the scheme than others - for example those with a local connection who were assessed as having a critical medical need, people with an Armed Forces background or those under-occupying their current social home. Again this raises questions around whether the banding and allocation criteria does support those in most need of being housed.

An LA in a rural area told us they were facing huge challenges in housing homeless applicants who were waiting on average 1078 days from the day they completed their application to the commencement of their tenancy despite the duty of the LA to house them. The LA explained that it had a severe shortage of 1 bedroom homes throughout the county. This inevitably raises questions around the effectiveness of how information about housing demand is used to guide the types of new social and affordable housing that is built. In light of the current context, it could be useful to find out how LAs have changed their practices and whether they have been able to house homeless people more rapidly.

What is the impact on people trying to find social housing?

Our research found that people approaching an LA to help them secure accommodation have to navigate very different systems depending on where they are looking and what they are looking for. Even where there are similar allocation schemes in place they may have different experiences because of how the scheme is operated.

For example, some schemes limit who can register whilst others encourage applications from all. Some try to personalise the service and minimise the initial paperwork whereas others require a prospective tenant to complete a detailed written application.



Website Information

Information available via websites varies from some that have quite a traditional public sector style and language with detailed policy and procedure documents to others that provide quite limited information set out in plain language. Where detail is provided, there is more information which could make it easier for someone to comprehend their likelihood of being able to access a home through this route. There are examples however, where the legal and technical language are likely to be a barrier. Where there is less detail, it may appear more user-friendly but it is not always clear what the likelihood of finding a home is, whether you are being treated fairly, or how you could question the organisation if you are unhappy with the service received.

Some LAs have tried to help people via their websites to understand the likelihood of finding accommodation of a particular type and/or in a specific location through the inclusion of information or software. Others don't provide any information that would help a prospective applicant make an informed decision prior to putting in an application.

Many websites provide information on a range of options of which social housing is one amongst others including the private rented sector, low-cost home ownership, housing co-ops, first time buyer initiatives, land trusts, intermediate rents etc. Although it isn't always clear how realistic or accessible these options are in reality, it is interesting to note that there are a range of options being put forward which raises the question of whether in the future, there might be scope to develop these options further in order to offer different solutions to people in different circumstances and reduce the demand for social housing.

It is also common for websites to be structured so that they signpost people to the appropriate information depending on their level of housing need, and in particular

whether they are likely to be accepted by the LA as homeless. Whilst this makes sense for the organisation and is understandable because of the legislative and policy context, we would question how clear this would be to someone who is not familiar with housing or legislative language.

Language

The language of eligibility can be bewildering for applicants. We found evidence of technical and complex language used to describe concepts such as reasonable preference, eligibility, intentionality, homelessness duties and legislation. Some LAs have published their allocation policy on their websites as the only way for applicants to understand how the system works, and many of these were over 30 pages long. We were also concerned to note allocation policies which had not been reviewed in the last 5 years raising questions about how relevant and fit for purpose they currently are.

Experience

People looking for social housing who contributed to this project outlined a range of experiences depending on where they were looking, the level of their housing need and the availability of the type of housing they needed. Respondents had waited between 3 weeks and 15 years to be housed. Probably unsurprisingly, frustration was expressed by those who had had to wait a long time to be offered a home they wanted but responses were generally positive about the advice and support provided by both LAs and HAs.



One respondent felt that the process was detrimental to their mental health and would advise others with anxiety to look in the private rented sector. The range of responses highlight the lack of consistency across Wales and for people in different circumstances:

'Just depends on banding but mine was really quick'

'I put my name down on list within 12 months I was in my flat'

'Only on the list for 3 weeks...quick and efficient'

'I have never had a problem with housing; whatever I need they have provided and been supportive'

'I had a lot of help/support with people to get on the list'

'the council and my local councillor were helpful'

'Good System but expect some issues... allocated a new build property in July 2019 but still waiting to move in'

'Keep bidding, be prepared to wait'

'Long wait...there are not enough 1 bed properties'

"if you suffer with any anxiety not the way the way to go would suggest private...It has made my anxiety and mental health issues much worse dealing with all the stress.'





3. Is it time to rethink how people access homes?

Clearly, the biggest issue facing those responsible for allocating social housing is the mismatch between supply and demand and the subsequent rationing process that allocation schemes have become. However, this work has also highlighted further questions alongside this – some of which take on a new potency in light of the COVID-19 pandemic.

Housing need and homelessness – who is social housing for?

This report shows that in terms of how homes are allocated, there is a differentiation between meeting immediate housing need and addressing other degrees of less urgent demand. Provision of housing to prevent homelessness is largely through two routes: social housing or signposting to the private rented sector both of which allow LAs to balance their duties to prevent homelessness, provide choice, make the best use of stock, meet what local communities want and promote tenancy sustainment.

Our research suggests that we have created an overly cumbersome and confusing allocation system. The current interpretation of housing legislation has established two groups of people and set them against each other – those with priority need and those without.

We recommend that Welsh Government and the Housing Sector, alongside communities, need to jointly clarify who social housing is for. If it is for everyone who wants it, we need a massive building programme, decoupled from private building with ongoing government subsidy to meet demand. If it is for people in housing crisis – and during the pandemic this is what it has become – then

the other housing options that at the moment are a smaller part of the offer need to be ramped up and expanded to meet the range of housing need and aspirations of the wider community.

This would also help the sector deliver on the recommendations of the Homelessness Action Group such as:

‘tenancy sustainment and rapid rehousing (including Housing First where appropriate) should be the default approach to support people who are at risk of homelessness or rough sleeping and brought about through a rapid rehousing transition process.’¹

With rising homelessness and rough sleeping very evident on our streets prior to COVID-19, it’s unsurprising that WG had been focusing greater attention on the contribution social landlords make to preventing and tackling homelessness. Extreme weather conditions and COVID-19 have since had an impact on what is expected of the housing sector both locally and nationally. It is likely the sector’s role in meeting the needs of those in housing crisis will become a greater priority not only during the crisis but longer term. Without a clear strategy on who social housing is for underpinned by appropriate funding levels and mechanisms, we run the risk of increasing tensions between those who have and those who do not have priority. And with calls for housing to be seen as a human right also gaining traction in Wales and attracting cross-party support in the Senedd, we would suggest that this fundamental question needs to be addressed.

It may well be the right time for the sector to also consider where our current approach fits with other Welsh Government policy drivers such as the focus on future generations.

¹<https://gov.wales/sites/default/files/publications/2019-10/homelessness-action-group-report-october-2019.pdf>



Research suggests that a key predictor of homelessness in adulthood is experiencing poverty and homelessness as a child².

The housing sector has managed to make a huge contribution to the public health drive of keeping people healthy and in safe accommodation by working in partnership. There is now a moment to deliver these changes in a long-term strategy focusing on ending homelessness for current and future generations across Wales.

Consistency

Consistency in how people access housing was a strong theme running through this research, especially when thinking about ‘Who is social housing for?’ and consequently eligibility within different allocation schemes. Whilst there is a need for local housing supply to be reflective of local circumstances, is it fair that this means people have a very different experience depending on where they are looking for a home? A better approach would be one that ensured each person’s experience and level of service is relatively consistent, irrespective of which local housing provider they are approaching.

Resources

Whatever approach is adopted, there is a balancing act that the sector is grappling with in trying to facilitate a fair and transparent allocations system whilst dealing with unprecedented housing pressure and demand. Many LAs, in particular where stock transfer has taken place, have experienced a lack of resources into the strategic housing function. Throughout our discussions, LA participants outlined the resource limitations they experienced. One told us that they had between 3-4 weeks’ backlog of application

forms waiting to be assessed, with only half a post-holder’s time dedicated to this. Similar conversations took place around the need to invest in new technology and the lack of resources available to achieve this.

The position seems clear: there isn’t enough resource going into the system now – if government locally and nationally truly wants to meet its housing and homelessness policy commitments, and if we are to be ready and prepared to deal with future pandemics or other external shocks, this needs to be addressed.

Implications of COVID-19

The pandemic has challenged the sector around how and who it houses and supports. The usual policies and working practices were largely abandoned during lockdown in order to meet a public health crisis. Local and devolved government worked closely and creatively with housing and homelessness organisations using rooms in hotels, student accommodation and hostels to provide 800 places for homeless people, many who had been sleeping on our streets previously.

Many have questioned why it took a pandemic to make this happen and the challenge now is how long-term housing and support solutions for people can be found.

Most economic and political commentators are predicting we are at the beginning of a deep recession and we run the risk of more people facing homelessness. With this in mind, what lessons can be learnt from the sector’s response to COVID-19 that could be used to future-proof our allocation systems? What did we do differently during the pandemic that we didn’t do before to move towards eradicating homelessness?

²https://www.feantsaresearch.org/public/user/Resources/magazine/2019/Winter/Homeless_in_Europe_Winter_2019_-_Article_8_-_Homelessness_and_childhood_adversity_Charlotte_Grey_and_Louise_Woodfine.pdf



The response during the pandemic shows what together government and housing providers can do. In light of COVID-19 and to meet the challenges ahead, does there need to be a complete overhaul of what the housing sector offers and how people access it? Do we know what people want and need from housing in a post-COVID-19 world? Outdoor space, digital connectivity and work space within the home had a significant impact on the quality of life of different households during lockdown, their mental health and wellbeing. The ONS released data that showed a correlation between the spread of COVID-19 and various measures of poverty and further links have emerged between both levels of overcrowding and the prevalence of Homes of Multiple Occupation with the spread of the disease. This clearly demonstrates the connection between housing and public health, adding urgency to the call to unite health and housing from a policy perspective.

While there has been an issue of empty properties arising from a ban on viewing properties, many providers adapted to offer contactless allocations from filling out application form to getting the keys, alongside virtual viewings. Early discussions suggest that greater efficiencies have resulted which can be built on for longer-term service provision. Being able to continue business as usual during pandemics or other extreme circumstances may need to be the norm.

Digital - the way forward?

Part of the solution lies in increasing our use of web-based approaches. There are significant differences in access across Wales and this needs to be overcome, but many of the participants we spoke to saw the further digital enhancement of their allocation processes as key to improving allocation management over the long term.

Yet at the time this research was conducted, only 9 out of 22 LAs provided applicants with the option to complete their housing application online. The majority offer a telephone service, followed by an interview with the Housing Options Team.

Approaches to moving to digital shared with us include:

- Merthyr Tydfil County Borough Council has introduced a daily online advert to ensure that there is no wasted time between a home becoming available and advertising it to applicants. This will enable the system to become far more efficient, reducing rent loss from empty properties by enabling applicants to be re-housed as quickly as possible. The local authority is now looking to launch a mobile phone / tablet friendly version of their application form to ensure that the process is as easy as possible for applicants to apply.
- Ceredigion County Council told us that all social housing applications are now completed online and whilst support is in place for applicants who may be digitally excluded, there has not been a demand for this locally.

Current estimates suggest around 94% of adults own a mobile phone and around 86% of 12-18 year olds regularly use a mobile³. This would suggest the benefit of being able to access the allocations process digitally but using a mobile phone would enhance services and make housing providers more able to continue to function during crises such as COVID-19.

³<https://www.statista.com/statistics/300378/mobile-phone-usage-in-the-uk/>



Monmouthshire Homesearch

Monmouthshire Housing manages the online Homesearch service for Monmouthshire LA which provides a common housing register for the 5 social housing providers operating in the area. The website provides a broad range of information and includes policy information and adverts. With partners and tenants, they are currently completing a wholesale review of their processes. Conclusions reached include:

- Customers felt allocations could be more transparent and some found the different offers and approaches (older people's housing, local lettings etc.) confusing.
- There is scope to reduce jargon and streamline processes.
- Based on customer feedback, they are looking to move to collecting basic information to begin with and then further details at allocation stage.
- They are considering whether they can have one process for all types of homes on offer including intermediate rent.
- They ask people to engage with them digitally but then don't respond in the same way so are looking at using automated text messages etc to provide more immediate feedback. For example, to say that an application has been received.
- They are considering moving all parts of the process to being carried out digitally - currently some parts require forms being printed off.
- Although the organisation feels it is clear that people need to bid, some respondents didn't know this.
- The organisation currently receives around 200 calls a week from people who have forgotten their bidding number. By automating this, they hope to free up staff time to work with anyone who needs more support through the application process.

- They are looking to introduce a live chat function which may be more accessible to younger people and people for whom English is not their first language.
- They want to make the complaints and appeals processes more transparent.
- The aim is for the new approach to be able to accommodate Housing First and rapid re-housing initiatives.

Joining things up

To get to a position where allocations systems are as effective as possible and integrated into cross-policy areas - particularly public health - how we offer and manage homes needs to be looked at via a whole systems approach. Allocations cannot operate in a silo and policies and decision-making around housing need should look at the interrelationships between where new social housing is built and how Social Housing Grant (SHG) is allocated.

One LA that took part in the research highlighted that there were areas within the county that had severely low demand and the current allocation system could not cater for these areas. The authority also had a relatively small waiting list and a high percentage of existing social housing. On the other hand, there are some areas in Wales that have unprecedented demand, yet this is not reflected in how much SHG is awarded to LAs. Our concern is that the calculation for how SHG is allocated does not reflect the level and nature of housing need and this may contribute to pressure on allocation systems.

Although this research did not explore this area in great detail, it is suggested that this is given more thought and analysis.



4. What next?

COVID-19 has brought into sharp focus the immediate health implications of a housing system that has led to a situation where we have people living in unsafe conditions (including rough-sleeping, sofa surfing and overcrowding). Health and housing services working together to provide safe and decent homes to people is important not only for their wellbeing but the health of the whole country.

Recommendations

1. We recommend a wholesale review of how social rented housing is allocated in light of lessons learnt from the pandemic as a matter of urgency. This review needs to consider the impact of inadequate housing on health and wellbeing across all tenures through the lens of housing's contribution to public health.
2. The review should be led by Welsh Government and needs to engage citizens, local government, housing and homelessness organisations, health bodies as well as other relevant agencies and bodies.
3. A more consistent approach needs to be taken across Wales to how social rented housing is publicised and accessed to make it simpler and fairer for citizens wherever they live in Wales.
4. Data collection needs to be consistent and part of a long-term strategy to make sure that across Wales we can be confident that we are meeting the needs of people whose health and wellbeing is at most risk through inadequate housing. We support the recommendation of the Homeless Action Group in relation to continuous recording of data¹.
5. Now is the time to refocus Social Housing Grant so that it can be allocated where severe housing need is evidenced and where housing is going to be allocated to people who are in severe housing need/homeless or at greater risk to future pandemics because of their housing situation.
6. We need to see social rented housing allocations within a wider "one housing system" approach. The broader range of housing options developed by Local Authorities and Housing Associations such as low-cost home ownership models, intermediate rented accommodation, land trusts, housing co-ops etc. need to be properly supported to reduce the pressure on social rented housing and enable the housing sector to meet a wider range of housing aspirations.
7. Allocation processes need to modernise so that people can find out about and access a home without personal contact, on-line using a mobile phone.

¹https://gov.wales/sites/default/files/publications/2020-03/homelessness-action-group-report-march-2020_0.pdf



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Chartered
Institute of
Housing
Cymru

Meet the team:



Catherine May

Tyfu Tai Cymru manager, CIH Cymru

E: catherine.may@cih.org T: 02920 741138



Matt Kennedy

policy and public affairs manager, CIH Cymru

E: matthew.kennedy@cih.org T: 02920 741137



Matt Dicks

director, CIH Cymru

E: matthew.dicks@cih.org T: 02920 741131



Sharon Dean

customer support coordinator, CIH Cymru

E: sharon.dean@cih.org T: 02920 741131

Tyfu Tai Cymru -
Because Housing Matters