



## **Wales Safer Communities Network response to: A Call for Evidence on securing a path towards Adequate Housing – including Fair Rents and Affordability**

Closed 15 September 2023.

Response submitted via the online survey.

### **Introduction**

The Wales Safer Communities Network was established in January 2021 following the recommendations of the Welsh Government's Working Together for Safer Communities Review. The Network aims to become the strategic voice for community safety in Wales, working collaboratively to champion and support community safety partnership working, and influence the shaping and development of national policy and local practice.

Community Safety partners include Fire and Rescue Services, Public Health, Councils, Police, Probation and the third sector.

A separate response may be submitted by the Welsh Local Government Association (WLGA).

### **Network Response: September 2023**

**Q1. Do you think that the 7 factors of adequacy identified by the UN are something to aspire to achieving in Wales? If so, what mechanism or combination of mechanisms do you think are required to achieve the 7 factors of housing adequacy in Wales? (Please explain your reasons)**

The Wales Safer Communities Network feel that supporting the 7 factors of housing adequacy in Wales is a sensible approach to promoting safe housing for all. However, we recognise the absence of funding and would suggest this should be added as an additional factor. The Network would suggest that a combination of funding, policy programmes, strategies, and legislative measures should be utilised. Practical support to individuals will only be possible if there is suitable legislative direction with clear and jargon free guidance supported by evidence-based decisions and suitable resources and funding. Effective monitoring to ensure compliance and data collection is essential to understand gaps and/or barriers in service provision which can then be targeted.

**Q2. What considerations should be taken into account if we were to establish a minimum core for the 7 factors of housing adequacy?**

The Network feel that by adopting these as a minimum core then it would help shift the focus on the health and safety needs of tenants away from profit and portfolio sizes. Whilst the Network would be supportive of focussing on a minimum core to ensure focus, we would also suggest a level of flexibility to enable additional elements to be considered if trends and data analysis suggested that additional areas of concern ought to feature as a priority such as funding, given the current cost of living operating climate.

**Q3. What type of monitoring arrangements and/or enforcement measures should be available to ensure the delivery of housing adequacy? (Please explain your reasons)**

As a Network we agree that to effectively monitor and enforce housing adequacy will require a mixture of processes and procedures to keep resource requirements low but whilst also ensuring consistency and transparency. Changing the standards will need an holistic approach which can only work if practitioners are supported, if legislation is available and penalties are actively issued with education freely available. Regular assessments of landlords and properties through self-assessments and assessments carried out by a range of partners (not just the Councils but could include other public services such as Fire and Rescue services), spot checks, tenant surveys and having an accessible route for the reporting of any breaches.

**Q4. Are there any other considerations or potential implications of working towards delivering the 7 factors of housing adequacy you wish to highlight?**

The cost of living situation and the additional implications of poverty which may limit the opportunity for homes to be kept warm and with no other option but to dry clothes without the aid of machines may all have an impact on the home habitat and is unlikely to be under the control of a landlord. It is also worth noting that when it comes to social housing it involves many of the most vulnerable and therefore it may be appropriate to include an element around the protection of vulnerable adults and children from hate and exploitation.

**Q5. Do you agree with the proposal to define “fair” in its broader context? (Yes/No – Please explain why)**

Yes. Expanding fair rent to cover both fair and affordable would appear appropriate, especially with the current financial climate having a negative impact on socio-economic factors, with wages not keeping pace with inflation rates and real life choices between food and bills are having to be made by an increasing number of the population.

However, the Network recognises that what constitutes as ‘fair and affordable’ may not always be seen as ‘fair’ by all. For example, ‘cheaper’ areas to live may be used more readily by services or be more appealing to those on limited budgets. Leading to changes in communities based on levels of affordability, which may not always be seen as fair by the community and potentially lead to community tensions rather than community cohesion.

As a Network we can see the benefit in seeking more autonomy in affordable housing, and we welcome support for individuals and families struggling to meet their rent payments where there is sometimes a real risk of homelessness. Affordable housing should reduce the risk of people being stuck in abusive relationships where they cannot afford to leave and may help to limit financial control, in addition it may reduce exploitation or acquisitive crime.

Additionally, redefining ‘fair’ should help limit financial or sexual exploitation by some landlords or their representatives.

**Q6. What considerations do you think should be taken into account when defining what is meant by fair rents – and how might we avoid unintended consequences?**

The Network would suggest liaising directly with tenants, Housing Associations and Registered Social Housing providers to understanding the common difficulties. We note that within the consultation it is recognised that there will be variables between Council areas, and that consideration of local incomes will be taken into account and we would support this so areas are not disproportionately disadvantaged.

One of the unintended consequences of fair and affordable housing, as already mentioned above, is that making some areas more financially attractive, they become more attractive to services such as probation and migration services who are looking to house people nationally whilst managing tight budgets. This may however increase the number of people from different ethnic and cultural backgrounds. The impacts can be mitigated through ongoing community cohesion activities and services and partnership working between the community, Council, Police and services looking to house people in the area.

**Q7. What considerations do you think should be taken into account when defining “local incomes” – and how should it be defined?**

We would suggest the average income of Council areas would be the easiest way to work out local incomes. Individuals may not work in the area they live it likely that where they live is likely to be where they shop and spend free time.

**Q8a. What measures should be used to assess affordability, and why?**

We would suggest that using the 30% rule as a base, cross referencing this with the localised average income may assist in understanding what the average rent payments should look like. As a Network we would always recommend liaising with local providers to understand the specific local areas as each will be different.

**Q8b. Do you agree that 30% of a household’s income is an appropriate indicator of affordability? Yes/No – If no, please explain why and what alternative value could be used).**

Yes. Please see 8a above.

**Q9. Can you provide any additional data or evidence which has not been considered? (Please provide details)**

The Network have no additional data or evidence to provide.

**Q10. Do you agree that better data on incomes and affordability is necessary to inform policy interventions – and how could this data be obtained?**

It may be appropriate to have up to date information where possible due to the additional challenges caused by the increased in the cost of living which is potentially placing more individuals and families into poverty. Census data may provide an initial baseline but we are aware more people may be having to take on second or third jobs and that the constant increase in prices is not being matched in pay rises across all sectors.

**Q11. What data do you consider needs to be captured on rents and relevant affordability factors, at what scale, and how often?**

Whilst as a Network we are not involved in data collection, we would suggest having annual data would be helpful. At a minimum we would suggest you need to have Wales specific information on the number of rental properties in a given area, the agreed rental charge and the number of occupants along with information on incomes and of disposable income.

**Q12. Are there other considerations and potential impacts (including other data sources) you wish to highlight in regard to the current and future private rental market?**

The Network has nothing further to add at this time.

**Q13. What other sources of data on rent might we draw on to inform policy development and future monitoring and evaluation?**

The Network would suggest you consider speaking to local foodbanks about the rates of take up in given areas, similarly with debt or financial advising charities, and we would also suggest liaising with women's domestic abuse organisations to get a better understanding of women who may be caught in abusive relationships and have no resource to enable them to leave.

**Q.14. Do you think there should be a requirement to provide rent information to Rent Officers? (Yes/No – If no, please explain why)**

Yes. If there is a duty to collect it, then there should be a duty to provide the information. This will also assist in monitoring/ exposing levels of exploitation (such as inflated costs, or under cutting costs for poor quality accommodation, or even sex for rent agreements).

**Q15. How do you think such a requirement could be enacted and enforced?**

We would suggest supporting legislation needs to be introduced, with clear guidance regarding the duties on landlords with powers to issue fixed penalties by Rent Officers for breaches of statutory responsibility. It could be one of the requirements placed on Registered Social Landlords and private landlords through Rent Smart Wales to provide detail.

**Q16. Should such a requirement apply to all landlords or only some, perhaps larger, landlords? Why?**

The Network feels that this should apply to all Landlords for the reasons outlined in question 14. Whilst we do appreciate this will add an administrative burden to only apply to some would be remiss and could lead to oversights and possible exploitation of system or enable the hiding of small groups with criminal or exploitative intent.

**Q17. What do you consider to be the advantages and/or disadvantages of first, second, and third generation rent control measures?**

The Network does not hold any opinion on the advantages or disadvantages of first, second and third generation rent control measures.

**Q18. What factors should apply to determine if a rent control measure is required?**

The Network do not have any thoughts on the factors, other than that when implemented the safety and wellbeing of tenants should be considered and priorities taken to avoid harm, abuse or exploitation.

**Q19. Who should be responsible for determining if a rent control measure is to be introduced?**

As a Welsh Network we feel it is important that the decisions on rent control are made by elected officials representing the interests of the Welsh populous, where this is not possible then a national body such as Rent Smart Wales and in some instances it may require the action of the Welsh Government.

**Q20. How could compliance with a rent control measure be monitored and enforced?**

Clearly the response to this will depend on the chosen control measure. However, we refer back to question 15. We suggest that sufficient and clear guidance for landlords and tenants is paramount they should be aware of penalties for failure to comply.

**Q21. Do you have any views on the models for rent control measures?**

The Network do not have any views at this time.

**Q22. Do you have any further evidence or observations that you wish to provide?**

Housing is an important element for community safety, it can enable community cohesion and improve the health and wellbeing of individuals. Housing related support can be important in the prevention of homelessness and in assisting health and wellbeing and whilst not forming part of ensuring adequate housing is available it can be an important element in ensuring successful tenancies occur in appropriate housing.

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