

Social Housing Allocations Policy Consultation Report

Housing and Public Protection
Division
June 2024



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What is the purpose of the report?

The purpose of this report is to provide members with a summary of the responses to the Social Housing Allocation Policy Consultation and the potential impact of these responses on our proposed new Policy. It will describe how we designed and carried out the consultation and summarise the results received. It will also explain what these responses mean and how we will respond to them in amending our Policy. Finally, It will summarise the potential amendments we will make to our Social Housing Allocation Policy.

What is the context of the report?

In September 2022 we published our Rapid Rehousing Transition Plan. This plan contains a set of actions that will help us, together with our partners, achieve our vision for Rapid Rehousing in Carmarthenshire:

Working together to end homelessness in Carmarthenshire by providing homes and support at the right time.

One of the actions was to review our Social Housing Allocation Policy to ensure it is fit for purpose to meet current and future need.

The way social housing is allocated in Carmarthenshire is outlined in our Social Housing Allocations Policy (commonly known as 'The Allocations Policy'). We operate a common approach with other Registered Social Landlords (Housing Associations) who operate within the County (The Partnership). The Policy is framed in accordance with section 167(2) of the Housing Act 1996 which provides local authorities with the ability to afford additional preference to those in urgent housing need.

At its meeting held on the 20th of February 2023 Carmarthenshire County Council's Cabinet considered the findings of the Communities, Homes, and Regeneration Scrutiny Committee Task & Finish Group. The group recommended an Emergency Social Housing Allocations Policy for Carmarthenshire to address the unprecedented situation where the Council, as with all Welsh Local Authorities and Registered Social Landlords, was facing increased demand for social housing that was exceeding the level of supply.

The Emergency Allocation Policy included:

- Changes to those who we consider to be in urgent housing need.
- Allowing for allocations to be directly matched to suitable applicants who were in most need.
- Prioritising allocations to those with a community connection to a particular area of Carmarthenshire.
- Allowing us to give no preference on the register to particular groups of people.
- Requiring applicants to re-register every 6 months.

The Emergency Allocations Policy was approved by Cabinet at this meeting, together with the recommendation to provide regular update reports on its effectiveness.

Following these regular update reports we reviewed our approach to the allocation of social housing and sought views on the possible changes to our existing policy.

An extensive public consultation exercise took place between 8th March and 31st May 2024. A consultation workshop also took place in December 2023 with members of The Partnership.

What did the consultation entail?

The consultation exercise was part of wider exercise to move from our Emergency Policy agreed in April 2023 to a new Social Housing Allocation Policy for Carmarthenshire. We agreed to carry out a public consultation over a 12-week period to include local members, members of the public and partner organisations.

In Carmarthenshire we operate a Common Housing Register with our RSL Partners. These organisations, together with the Council, constitute 'The Partnership' The Partnership is made up of the following participating RSLs:

- Bro Myrddin Housing Association
- Caredig Housing Association
- Pobl Housing Association
- Wales and West Housing Association

Between December 2023 and January 2024, we held consultation workshops to consult in-depth with these partners. A summary of this consultation can be found in Appendix 3.

The public consultation was carried out by means of a questionnaire published on the Council website which we invited all stakeholders to respond to.

The areas we consulted on were:

- Changes to those who we consider to be in urgent housing need.
- Allowing for allocations to be directly matched to suitable applicants who were in most need.
- Prioritising allocations to those with a community connection to a particular area of Carmarthenshire.
- Allowing us to give no preference on the register to particular groups of people.
- Requiring applicants to re-register every 6 months.

The consultation questionnaire consisted of 14 questions relating to the themes above plus the opportunity for people to tell us anything else they felt important about the way in which we allocate social homes. The questions can be seen in Appendix 1.

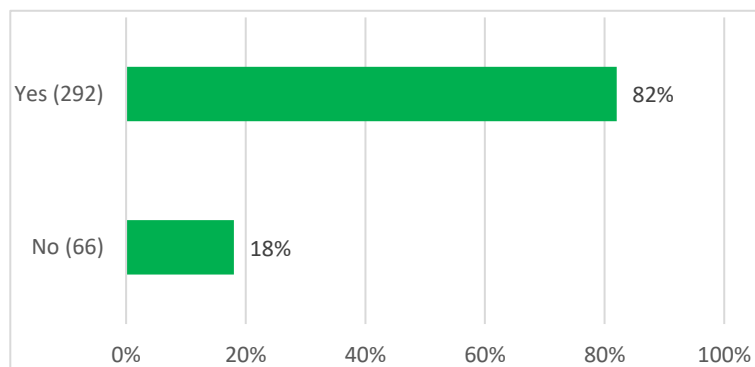
We carried out a widespread engagement exercise to maximise responses. We publicised the consultation in the press and on social media, through our Hwbs, in newsletters and via a mailshot to all those registered with us for social housing. We also wrote out to local and national partners to encourage them to respond. We provided alternative means to engage for those who did not feel comfortable responding online.

The consultation lasted for 12 weeks and received 367 responses.

What did the consultation tell us?

Preferring those in urgent housing need

1. Do you agree that highest preference should be given to those who we have a legal duty to help because they are homeless?



What does it tell us?

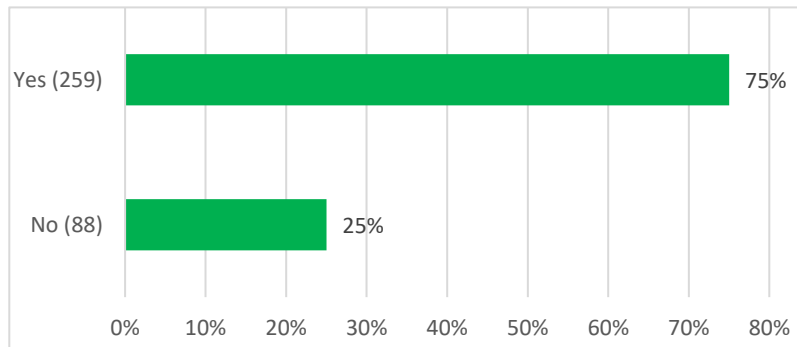
There was strong agreement that we should continue to prefer those in greatest housing need, particularly homeless applicants. However, there was concern that the revised Banding negatively affected those who were overcrowding, and consideration should be taken as to whether this group should be added into Band A.

What are the potential implications for the policy?

This means that our decision to prefer homeless applicants as those in greatest housing need is working and perceived by respondents as the right thing to do. We should continue to retain homeless applicants in Band A.

Whilst we have sympathy with the suggestion that those who are overcrowded should be placed into Band A we are mindful that this will increase the number of households within Band A and include households who are already in accommodation. We propose we should continue to place applicants who are overcrowded into Band B and monitor the number of these applications.

- 2. Have we got the existing Banding groups right?
- 3. Are there any groups we have not considered?



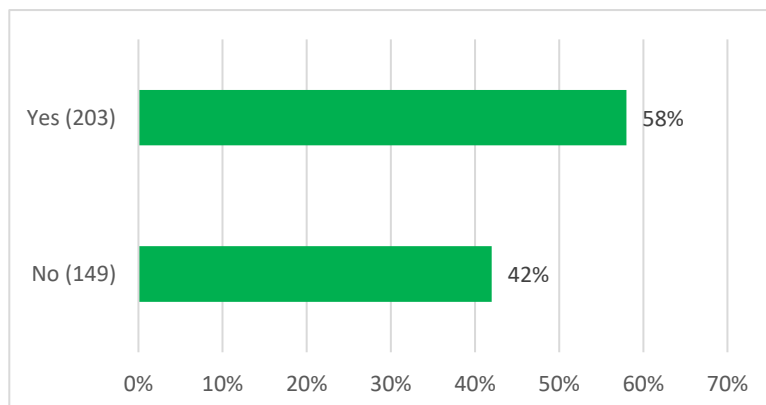
What does it tell us?

There was concern that we had overlooked some specific groups when identifying those in urgent housing need such as those experiencing domestic abuse, care leavers, and people with disabilities, and there may be a need to explicitly mention these groups within the narrative of the Banding.

What are the potential implications for the policy?

This means that our policy is not clear as to the preference give to applicants who present with the above needs. We should ensure that our policy is clearer for those experiencing domestic abuse and those with disabilities that are placed into Band A and we should add the category of “young people who would be homeless on leaving the care system” into Band A.

- 4. Do you agree that we should give no preference to people who have the means to meet their own housing need



What does it tell us?

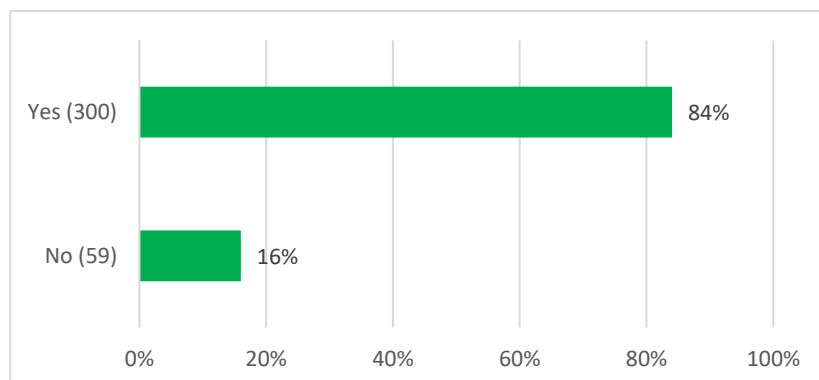
There was agreement, albeit not as strong, with the suggestion of not preferring those who had the means to meet their own housing need. Concern was raised over access to the private rented sector and people’s assets being tied up in depreciating property.

Clearly stipulating what is meant by the term “means to meet their own housing need” and a robust mechanism for evidencing this is crucial to give people the confidence that this test is being applied fairly and consistently.

What are the potential implications for the policy?

This means that our policy is right to include those with the means to meet their own housing need within the “No Preference” group. However, we should have clear operational procedures as to how we define and evidence this. The need for an assessment of this should be written into the Policy.

5. Do you agree we should give no preference to people who have behaved in a way which would make them unsuitable to be a tenant such as committing ASB or having large rent arrears?



What does it tell us?

There was very strong agreement with giving no preference on the register to those where there was evidence of serious antisocial behaviour and strong agreement to giving no preference to those with serious rent arrears. However, there was some concern that this should not be a “lifetime ban” but that applicants be permitted to evidence a change in behaviour to allow them preference again.

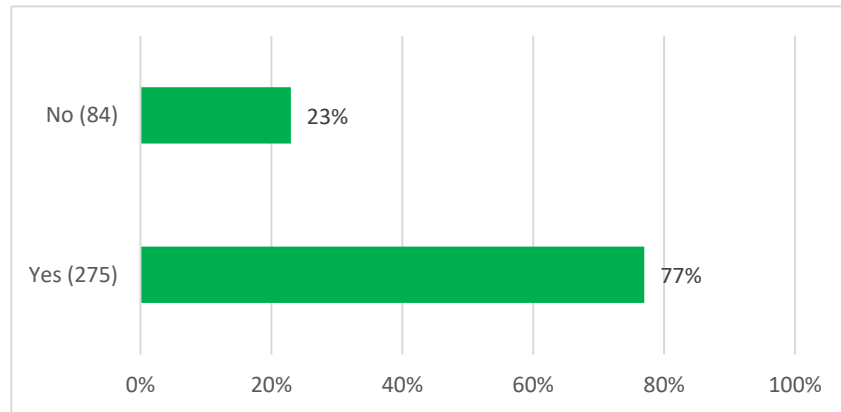
There was also concern that underlying causes for this behaviour may be missed and a trauma-informed, person-centred approach was called for by some respondents.

What are the potential implications for the policy?

This means that we are right to give no preference on our housing register to those who have behaved in a way which would make them unsuitable to be a tenant such as

committing ASB or having large rent arrears. However, we should be mindful that people are offered support to help them to address these issues and we should keep any decision to give no preference under review.

6. Do you agree we should give no preference to people who do not have a local connection to Carmarthenshire?



What does it tell us?

There was strong agreement with only giving preference to people who had a local connection to Carmarthenshire, although there appeared to be some misunderstanding of the rights of those who might be experiencing abuse or violence elsewhere and how local connection is exempt in these circumstances. Concern was raised as to the definition of local connection and that a broader interpretation might be necessary to include those who had been born, and previously lived, in the County but had moved away and needed to come back for a reason.

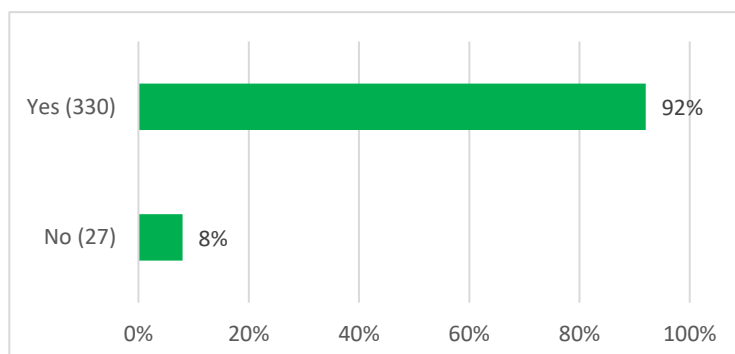
There were also concerns regarding the rights of those who live in towns and villages that border other local authorities. A co-operation agreement or shared application was suggested in these cases and should be explored.

What are the potential implications for the policy?

This means that perhaps our policy is not clear on what we mean by local connection. The legal definition of local connection is clearly set out within the appendices of the policy, including the groups of people who are exempt from local connection. We should ensure the policy makes this clear.

Allocation Process

7. Do you agree we should match suitable properties to people to meet their housing need?



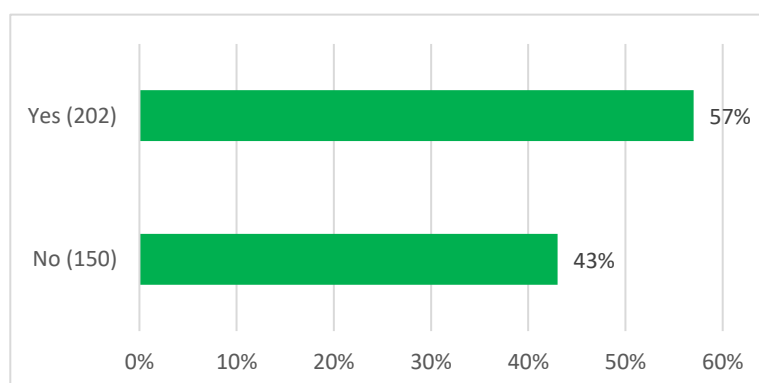
What does it tell us?

There was very strong agreement for the direct matching of properties with 92% in favour of this suggestion. However, attention needs to be paid to the suitability of any match made and the needs of each applicant taken into consideration when making a match.

What are the potential implications for the policy?

This means that our proposal to direct match properties to those in greatest housing need was the right one. We should include a link to the Welsh Government's Suitability of Accommodation Order, so people are clear what we mean by a suitable match.

8. Do you agree we should only advertise on Canfod Cartref properties when we are not able to find a suitable match on the register?



What does it tell us?

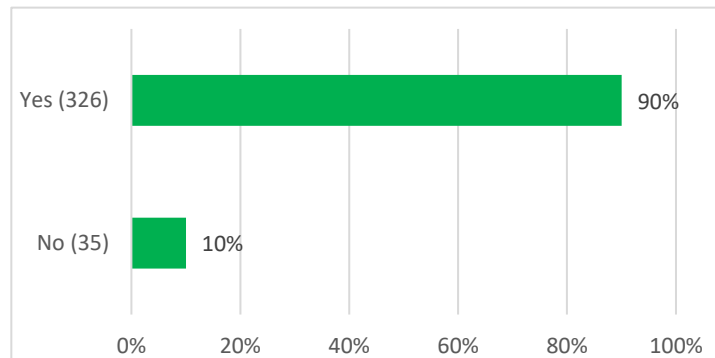
This response appears to contradict the previous one in question 7 which was strongly in favour of directly matching most properties.

What are the potential implications for the policy?

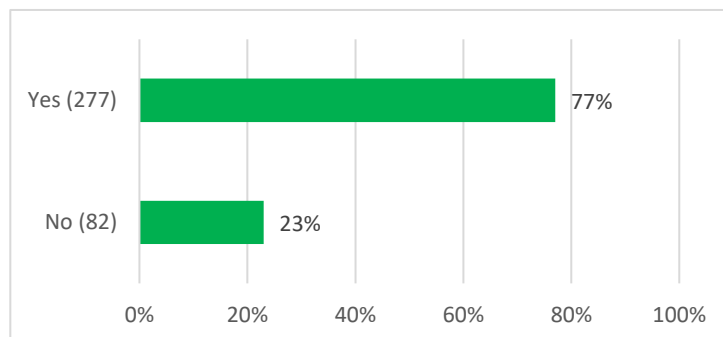
This may be because people still wish to see some properties coming through to advert and support the right to choose where they live. We should continue to advertise those properties that we cannot easily match to.

Local and Community Connection

9. Do you agree we should give priority to those seeking housing who live or have a local connection to Carmarthenshire?



10. For those seeking housing in a particular area/ward, should more priority be given to those with a community connection to that area/ward?



What does it tell us?

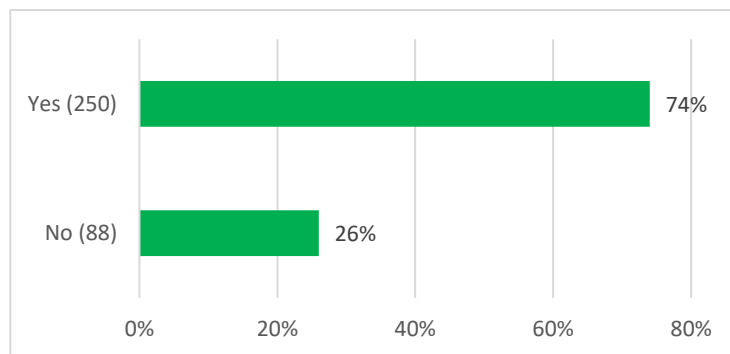
There is very strong agreement with matching by community connection area and the rationale for doing this. People believed applicants were more likely to sustain a tenancy if they were housed in an area that was close to family, support networks, employment etc. However, some applicants might be willing to live anywhere within the county and would be at detriment in having to state just one specific area. Concern was also raised about those who may wish to move **from** an area for a particular reason. The policy needs to reflect the needs of these individuals.

What are the potential implications for the policy?

This means that our policy is right to directly match most properties to people who have a community connection to the area in which the property is.

There is scope for allowing people to state more than one community connection area if they are willing to live in a range of places. When operating the policy, we need to be mindful of areas where people cannot or do not want to go for legitimate reasons.

11. Do you think we have grouped these Community Connection Areas about right or would you suggest any amendments to them?



What does it tell us?

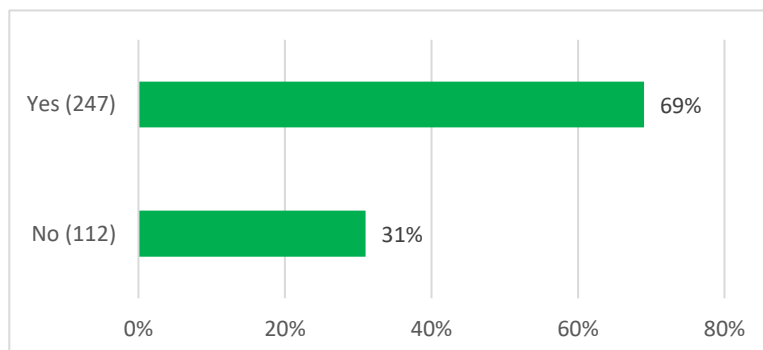
It was felt that the community connection areas were broadly correct but there was comment about the size of some and the random make up of others. A review of some of the community connection areas is needed and potential alternative options should be proposed within the revised policy.

What are the potential implications for the policy?

This means that we haven't quite got the community connection areas right within the Policy. Three areas that have particularly caused concern due to their size are Llanelli West, Llanelli North/Rural, and Rural North. Therefore, we propose review the scope of these community connection areas to reflect more accurately with where people want to live. We will review the community connection areas in readiness for implementation of the new policy.

Offer of Accommodation

12. Are two suitable offers of accommodation reasonable for applicants who are not homeless but need to move?



What does it tell us?

Most people agreed that two suitable offers were sufficient although there was some discussion as to the suitability of offers and the need to ensure offers matched people's needs. Difficulties with age restrictions on some accommodation settings were also raised by respondents.

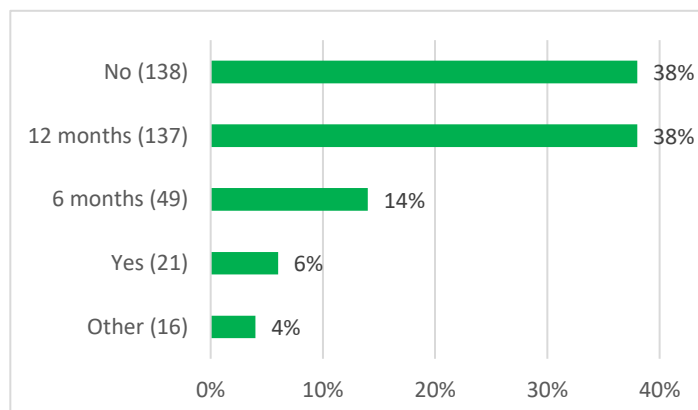
What are the potential implications for the policy?

We should retain the provision of two suitable offers of accommodation for applicants who are not owed a homelessness duty.

A link to the suitability standards as set out in The Homelessness (Suitability of Accommodation (Wales) Order 2015 may help to clarify for people what is required by law regarding suitability and a link to this should be provided within the policy.

Re-registering

13. Should we set timescales in relation to how often someone should have to re-register to remain on the housing register; for example, six months, 12 months, or a different timescale?



What does it tell us?

There is evidence that people are not in favour of a 6-month re-registration period. Although some people stated that the timeframe for re-registering should be shorter than 6 months, most preferred a longer period for re-registering or no need to re-register at all. People told us that re-registering takes time, and some people need help to complete a re-registration.

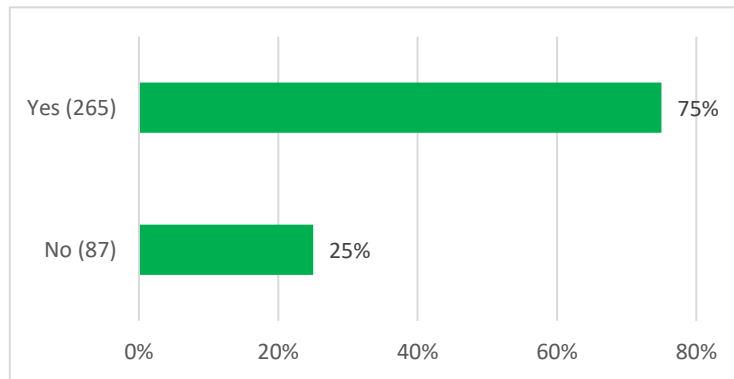
What are the potential implications for the policy?

We moved to a 6 monthly re-registration period because it enables us to regularly refresh the information we hold about people. This means that a person's application is more likely to be up to date when we make a direct match. When the information we hold about a person is not accurate or up to date it can mean that we make an unsuitable match, and any match is more likely to be rejected. This causes extra work for our staff and delays in properties being allocated.

Requiring people to re-register every 6 months keeps our register as up to date as possible and means that people who no longer need to be on the register are removed regularly. This allows us to focus on only the people who need our help because they are in housing need.

Although people felt that re-registering every 6 months might be too often, we propose this timeframe should remain.

14. We will write to you when it is time to re-register your application. Should we provide other options of communication to help people re-register?



What does it tell us?

Most people were happy with some form of written communication regarding re-registration, but people told us there needs to be consideration for those who struggle with literacy or have support needs.

What are the potential implications for the policy?

Where an applicant has identified a need for help on their application then efforts should be made to communicate with them via a telephone call or through a support worker prior to closing an application. This recommendation was also made by The Partnership when considering accessibility issues. The offer of help in the local Hwbs to assist people to re-register should also be made available.

What other general themes emerged?

Apart from the responses to the questions we asked about the main changes to the Policy, we also provided people with the opportunity to respond to anything else relating to the way we allocate social homes.

Some people shared their concerns around the perceived transparency of the scheme. This was particularly in the way allocations of specialist accommodation such as accessible homes or sheltered housing are made.

The issue of policies regarding pets in certain types of accommodation was also raised by respondents.

What are we going to do about this?

Although these issues are not part of the main Policy, they form the basis for many allocations and therefore need consideration and review.

We intend to explore with neighbouring local authorities the opportunities for joint applications or co-operation agreements for those who live in border villages.

We intend to look at our contracts considering the way they relate to pets and review what is reasonable to include within a contract with regards to people owning and keeping pets in their homes.

We intend to publish our sub-policy for the allocation of accessible homes as part of our Allocation Scheme.

We should review the allocation of age-specific accommodation and consider whether the age restrictions are appropriate or whether some might need raising or lowering in the light of evidence.

What are the next steps?

With 367 responses received and a majority in favour of all the proposals we are confident people are in favour of the way we allocate social homes in Carmarthenshire.

There is strong buy-in from partners and a wide understanding of the pressures on the system that have led to the need for these changes.

Following the approval of the Emergency Policy in April 2023 we have seen a large proportion of homes allocated to applicants who were homeless or in other urgent housing need. This has allowed us to better manage our temporary accommodation and successfully discharge our legal duties to homeless applicants. We have seen unsuitable matches and legal challenges decrease and relationships across The Partnership improve.

Following the outcome of the consultation exercise we suggest the following amendments will be considered to the allocation policy to reflect the views and comments expressed.

Potential Amendments to The Policy

- Explicitly mention those experiencing domestic abuse, care leavers, and those with disabilities within the narrative of Band A
- Define “means to meet their own housing need” within the body of The Policy.
- Make reference to the assessment of means within the policy.
- Ensure there is reference to applicants in the “No Preference” group being offered support and regularly reviewed.
- Review the definition of Local Connection for means of applying preference to include those who were born and have previously lived in the county but have moved away.
- Amend the community connection areas to make them more fit for purpose (See Appendix 4).
- Make it clear within The Policy that where an applicant needs to move away from a particular community connection area they can do so without detriment.
- Provide a link to the suitability standards within The Policy.
- Publish the Accessible Homes Allocation sub-policy as part of the Social Housing Allocation Policy.
- Include those amendments recommended at The Partnership workshop (Appendix 3).

These changes proposed will allow us to deliver a robust, fair Policy for the allocation of social homes that should see lettings to those in most urgent housing need increase and homelessness decrease.

Members are asked to consider the results of the consultation process and offer any further views on the future new Allocation Policy.

Appendix 1

Consultation Questionnaire Changes to the Social Housing Allocations Policy

The way social housing is allocated in Carmarthenshire is outlined in our Social Housing Allocations Policy (commonly known as 'The Allocations Policy'). We operate a common approach with other registered social landlords (Housing Associations) who operate within the county. The policy is framed in accordance with section 167(2) of the Housing Act 1996 which provides local authorities with the ability to afford additional preference to those in urgent housing need.

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The Emergency Allocation Policy included:

- changes to those who we consider to be in urgent housing need.
- allowing for allocations to be directly matched to suitable applicants who were in most need.
- prioritising allocations to those with a community connection to a particular area of Carmarthenshire.
- Allowing us to give no preference on the register to particular groups of people.
- requiring applicants to re-register every 6 months.

The Emergency Allocations Policy was approved by Cabinet at this meeting, together with the recommendation to provide regular update reports on its effectiveness.

Following these regular update reports we are reviewing our approach to the allocation of social housing and would welcome your views on the possible changes to our existing policy. We would be grateful if you could complete the questionnaire below to help us make an informed decision, and ensure the policy is as effective as possible.

Preferencing those in urgent housing need

The law tells us how we should prioritise some people. We have prioritised applicants as follows:

[Band A: Urgent housing need](#) (the law tells us we must prioritise these groups)

[Band B: Housing need: Reasonable Preference](#)

[Band C: Registered only](#)

[No preference group](#)

1. Do you agree that highest preference should be given to those who we have a legal duty to help because they are homeless?

Yes.....

No.....

2. Have we got these preference groups right?

Yes.....

No.....

If not, why?

3. Are there any groups we have not considered?

Comments.....

4. Do you agree that we should give no preference to people who have the means to meet their own housing need?

Yes.....

No.....

Comments.....

5. Do you agree we should give no preference to people who have behaved in a way which would make them unsuitable to be a tenant such as committing ASB or having large rent arrears?

Yes.....

No.....

Comments.....

6. Do you agree we should give no preference to people who do not have a local connection to Carmarthenshire?

Yes.....

No.....

Comments.....

Allocation Process

We would like your views on our [allocation process](#) and directly matching most allocations to people in housing need (See [Appendix Four](#)).

7. Do you agree we should match suitable properties to people to meet their housing need?

Yes.....

No.....

Comments.....

8. Do you agree we should only advertise on Canfod Cartref properties when we are not able to find a suitable match on the register?

Yes.....

No.....

Local and Community connection

We would like your views on if we should give priority to people who are resident to Carmarthenshire and whether we should give more priority to people who are resident in a particular area/ward.

9. Do you agree we should give priority to those seeking housing who live or have a local connection to Carmarthenshire?

Yes.....

No.....

Comments.....

10. For those seeking housing in a particular area/ward, should more priority be given to those with a community connection to that area/ward?

Yes.....

No.....

Comments.....

11. Do you think we have grouped these [Community Connection Areas](#) about right or would you suggest any amendments to them?

Yes.....

No.....

Comments.....

Offer of accommodation

12. Are two suitable offers of accommodation reasonable for applicants who are not homeless but need to move?

Yes.....

No.....

Please explain your choice.....

Re-registering

13. Should we set timescales in relation to how often someone should have to re-register to remain on the housing register; for example six months, 12 months, or a different timescale?

Yes.....

six months

12 months

Other (Please suggest)

No.....

Comments.....

14. We will write to you when it is time to re-register your application. Should we provide other options of communication to help people re-register?

Yes.....

What? (Please suggest)

No.....

15. Are there any other comments relating to the amendments to the Social Housing Allocations policy you would like to provide?

Comments.....

Appendix 2 Additional Comments made by consultees

Overall, a total of 367 responses were received to the consultation. The responses to each individual questions are given below with a brief summary of the comments provided where relevant.

Preferencing those in urgent housing need

- 1. Do you agree that highest preference should be given to those who we have a legal duty to help because they are homeless**

“Local homeless people should have first rights to accommodation” and “Homeless and disabled should be highest priority”.

- 2. Have we got the existing Banding groups right?**

The groups we devised to allocate people to the different Bands were as follows overleaf:

Band A - Emergency Eligibility

1. Homelessness: Additional Preference

- Applicants who have been assessed under Part 2 of the Housing (Wales) Act 2014 and a section 75 duty has been accepted

2. Homelessness: Reasonable Preference

- Applicants who are homeless, and housing will relieve their homelessness (Section 73 Housing (Wales) Act 2014)
- Applicants who have a substantiated threat of homelessness and housing will prevent their homelessness (Section 66 Housing (Wales) Act 2014)
- Applicants who would be owed a homelessness duty as they need to move on from supported housing

3. Urgent Housing Need: Additional Preference

- Applicants who we owe a homelessness duty as a result of violence or threats of violence likely to be carried out and who as a result require urgent rehousing, including:
 - victims of domestic or other abuse
 - victims of hate incidents.
 - witnesses of crime, or victims of crime, who would be at risk of intimidation amounting to violence or threats of violence if they remained in their current homes.
- Applicants who need to move due to high risk or life-threatening medical/welfare grounds which will not improve until more suitable accommodation is offered. This will require an assessment by an appropriate professional
- Applicants who need to move to suitable accommodation because of a serious injury, medical condition, or disability which he or she, or a member of their household, has sustained because of service in the Armed Forces
- Applicants who are currently occupying a property where there is a statutory requirement to vacate due to a prohibition order/demolition order/compulsory purchase order
- Applicants who are currently under-occupying social housing in Carmarthenshire and needs to transfer to a smaller property due to the current property being unaffordable and remaining would result in hardship

The Housing Act 1996 Section 167 gives full detail of situations where applicants should be given additional preference and/or assessed under Part 2 of the Housing (Wales) Act 2014 and we will assess applicants in accordance with this legislation fully.

Band B – Housing Need: Reasonable Preference

- Applicants who need to move, as their medical/welfare condition will not improve. The assessment is not based on the medical condition alone but how their current accommodation affects their health. This includes applicants living in a mobile home, caravan or converted vehicle
- Applicants who need to move to provide or receive support and care as they cannot carry out day to day activities alone i.e., washing, cleaning, and getting in and out of bed
- Applicants who are currently under-occupying social housing in Carmarthenshire and want to transfer to a smaller property
- Applicants who want to move from an adapted home that they no longer require. This would then benefit another household who requires this specialist type of property
- Applicants occupying insanitary or overcrowded housing or otherwise living in unsatisfactory conditions
- Applicants who need to move to a particular locality in Carmarthenshire County Council, where failure to meet that need would cause hardship to themselves or others

Band C – Registered Only

- Applicants who have no housing need based on the information they submitted on their application

No Preference Group

- Have the financial resources available to meet their housing costs
- Have been guilty, or a member of their household has been guilty, of unacceptable behaviour serious enough to make them unsuitable to be a tenant of the Council AND in the circumstances at the time their case is considered, they deserve, by reason of that behaviour, not to be treated as a member of a group of people who are to be given preference
- Do not have a local connection to Carmarthenshire, as defined at section 81 of the Housing (Wales) Act 2014, unless they are exempt from the local connection criteria as set out in Appendix Three

Several comments were made relating to additional preference needing to be given for those with disabilities. It appears that the current policy may not be as explicit as it could be in identifying this cohort as having additional preference with many respondents stating disability as a missing group. Applicants who need to move to suitable accommodation because of a disability are already placed into Band A.

There were also comments relating to both overcrowding and under-occupying as being issues that should have greater preference on the register. Only applicants who are currently under-occupying social housing in Carmarthenshire and need to transfer to a smaller property **due to the current property being unaffordable and remaining would result in hardship** are placed into Band A. All other applicants who are under-occupying are placed into Band B. All applicants who are occupying overcrowded housing are placed into Band B. A suggestion was made to:

“Have proactive systems in place to monitor overcrowding and offer transfers etc”.

with another respondent stating:

“Applicants who are currently under-occupying social housing in Carmarthenshire and want to transfer to a smaller property. Should be given higher priority to increase flow”.

3. Are there any groups we have not considered?

There were some comments relating to the specific needs of those experiencing domestic abuse, people who have left the armed forces and young people, particularly care leavers. It was felt that the preference on the register for these groups should be specifically stated. Regarding care leavers, there was feedback that a more planned approach should be taken when moving from the care of the local authority into independent living, and that they should be explicitly named in Band A.

4. Do you agree that we should give no preference to people who have the means to meet their own housing need?

Although the response to this question was not as definitive there was still agreement with the sentiment with 58% of respondents agreeing that there should be no preference on the register for those with the means to meet their own housing needs.

“There are plenty of people who apply that have enough income or savings to rent privately or buy. It should be screened like a means test”.

However, there was some concern over what this might look like in practice and how it might be applied.

“Yes, however the policy is rather vague as to the criteria. Is there a financial threshold that the council will publish from time to time? Also, should there be something about availability of those means? e.g. some older people might live in terrible conditions in owned assets which however cannot be sold due to those conditions”.

Looking at each case on its merits and having a person-centred approach was cited in several comments,

“Providing this is looked at with each case and their reasons are taken into consideration”.

One such example of this was provided by one respondent,

“My husband and I work full time, but both have disabilities. We can't buy a house due to me having poor credit as a result of fleeing domestic violence. We can't rent as there are no wheelchair adapted rental properties. We shouldn't be penalised because we work for a living”.

This was particularly a concern for people with additional needs such as those needing adapted properties or those recently evicted from the private rented sector.

There was some concern over what was meant by “the means to meet their own housing need” and how this might be assessed. Careful consideration would need to be taken with how this was implemented.

Many people, however, did not agree with this sentiment and thought that social housing should be available to all regardless of means as a matter of fairness and equity,

“If I have the means to pay for social housing and not be a burden on the social security then why shouldn't I be given an opportunity”.

Others conflated this statement with the state of renting in the private rented sector, the high price of rents, security of tenure, and the lack of suitable PRS accommodation:

“People like ourselves who have been given notice to quit our tenancy after 20 years because the landlord is selling the property, we are up to date with the rent and no arrears”.

5. Do you agree we should give no preference to people who have behaved in a way which would make them unsuitable to be a tenant such as committing ASB or having large rent arrears?

There was very strong agreement with this statement. Comments showed that this was particularly the case regarding ASB but less so regarding rent arrears.

There was some concern that reasons behind rent arrears would not be taken into consideration and there may be mitigating factors which had led to this situation. Several people stated mitigating factors which might lead to rent arrears and the need to understand and address these factors. There was also a call to define what was meant by “large” rent arrears.

“There may be deep rooted reasons for these issues, they should be offered support not punishment or they will end up homeless causing greater issues and costs.”

“I would like you to ask WHY these people are behaving in such a way or have large rent arrears and go upstream a lot more to address those issues”.

It was also felt that being placed into a “no preference” band should not be an indefinite consequence of such behaviour but that such a banding be monitored and reviewed to allow people to change their behaviour, especially if it was a consequence of mental illness, learning disability, or trauma.

“A lower band (temporarily and subject to review) would be reasonable, but giving no preference at all seems harsh”.

Are there any rules around timescales for ASB? What if it was committed 10 years ago? There might be indirect equality impacts on those with mental health issues or learning disabilities where the behaviour was caused by those e.g. ASB might have been caused by a temporary mental health issue but continued despite support? We would recommend that these types of exclusions are monitored and reviewed regularly, including breakdown by protected characteristic. Also, that the policy is applied in a trauma informed way, there could have been unmet support needs which have now been resolved. Criteria as to what constitutes large rent arrears should be available and published from time to time”.

6. Do you agree we should give no preference to people who do not have a local connection to Carmarthenshire?

Again, there was strong support for this suggestion particularly with respect to sustaining the Welsh Language and community cohesion.

“Definitely and most importantly! This should be top priority! This would help keep the Welsh language alive in Carmarthenshire and local schools can plan for the children that already live in the villages and towns of Carmarthenshire.”

“Mae'n hanfodol i'r Cyngor ddiwallu anghenion pobol lleol yn gyntaf onibai bod gwir frys ar rai yr ydynt yn ddi-gartref. Mae'n rhaid i ni flaenoriaethu ein pobol lleol a sicrhau bod ein cymunedau yng allu parhau a'r iaith Gymraeg yn ffynnu ac nid o dan fygythiad gyda pobol yn symud mewn i ardaloedd a newid iaith ein cymunedau. Rydym angen sicrhau ein bod yn gallu cartrefi ein pobol ifanc lleol yn arbennig er mwyn iddynt aros i fyw yn Sir Gar os ydynt yn dymuno”.

There were some concerns raised about how this might affect people who were born and raised in Carmarthenshire but had moved away and wanted or needed to come back to the county.

“Not necessarily, people may have lived there in the past and need to return due to a change in circumstances and require support”.

“I very nearly didn't meet the criteria because I had been out of area for 12 months and because my family that did live in the area had passed away even though I had lived in Carmarthenshire for 17 years prior to this. So again, I think it's more the criteria needs to be looked at”.

There were some comments relating to how this might affect people who had experienced domestic abuse or threats of violence and needed to find a safe place to live. Although the law is very clear on these exemptions the policy may not currently be clear enough.

“I think many people have reasons to want/need to move. Domestic violence, abuse within family or friends. A lot of people end up hurt, suffering or dead if they are unable to relocate and create a new life for themselves”.

The rights of those who live in villages that border other local authorities was also raised and the need for co-operation between authorities was suggested as a way forward:

“I would agree, but I would like to see formalised partnership agreements with neighbouring local authorities. For example, someone who has lived just over the other side of the Teifi in Llandysul (Ceredigion) should be considered to have a local connection to the rest of the town (Pontwelly). This is the same in other towns split by the Teifi such as Lampeter and Cwmman and Newcastle Emlyn and Adpar”.

Although most respondents felt that housing stock within the county should be primarily for local people there was some sympathy for the needs of the wider population and the rights of individuals to choose where they live:

“Carmarthenshire people should come first, but that doesn't mean we should exclude other people”.

Allocation Process

7. Do you agree we should match suitable properties to people to meet their housing need?

There was very strong agreement that we should match suitable properties to applicants.

However, there were some caveats mentioned alongside this response. Many respondents referred to their own situation and time spent on the waiting list stating that those not in Band A would wait significantly longer for an allocation.

“I have been on list for 2 years and are nowhere near getting a property”.

Some people felt that the system was not transparent and that allocating by community connection area limited someone's chances of being allocated a property if they were willing to move anywhere.

“I do not feel this is a transparent process. I also feel that applicants will consider accommodation outside of their community connection areas”.

There was a recognition that allocating in this way meant there were much fewer properties going to advert and this affected people's choice.

“It will leave a significantly lower number of properties on the Canfod Cartref list. People who need to move will be prevented from ever being allocated a suitable home”.

“I agree to an extent, but I also think people in need should have the right to choose where they would like to live too not just having to wait on a match and having no idea what is going on or when they are going to get a property”.

There were several comments relating to the suitability of matches and applicants being expected to accept properties that they did not feel met their needs.

8. Do you agree we should only advertise on Canfod Cartref properties when we are not able to find a suitable match on the register?

This response appears to contradict the previous one which was strongly in favour of matching most properties. It may be because people still wish to see some properties coming through to advert and support the right to choose where they live. Without further narrative it is difficult to comment further.

Local and Community Connection

9. Do you agree we should give priority to those seeking housing who live or have a local connection to Carmarthenshire?

Again, there was strong support for preferring local people for housing allocations. The benefits of support networks and community links was cited as reasons why people should be accommodated locally.

“Yes, this is part of strengthening community. I was homeless and with mobility issues, being close to my son is essential for my mental wellbeing, but also building on community networks and growth in opportunities”.

Similar arguments were provided to those given for question 6 with people stating why they believed preference should be given to those with a connection to Carmarthenshire (notwithstanding the legal reasons for exemption). However, people also stated the need for flexibility where towns and villages straddle borders.

“In the main, yes. Though flexibility should be allowed e.g. those who live on the border etc.”

10. For those seeking housing in a particular area/ward, should more priority be given to those with a community connection to that area/ward?

There was less agreement for allocating by community connection than for by local connection to Carmarthenshire.

The benefits of staying in a community area were shared including links to local schools and support networks:

“Because for some moving area would also mean moving a child's school which is not good for children to keep moving schools”.

“Yn sicr. Mae'n hanfodol i ni gefnogi ein pobol i ddod nol neu aros yn eu cymunedau ac i deuluoedd ifanc fedru cael cefnogaeth eu teulu yn lleol os ydynt yn dymuno hynny. mae hyn hefyd yn hanfodol i sicrhau cymuned ffyniannus a dyfodol llewyrchus i'n diwylliant a'r iaith Gymraeg. mae'n cymunedau angen pobol leol i aros neu dychwelyd iddynt”.

However, others felt that limiting allocations to community connection areas was restrictive and didn't allow for personal choice or movement to relocate for a range of reasons.

“What about those wanting to live close to transport links? Motorway, train station? At a time of financial difficulty this should be considered”.

It is worth bearing in mind that some persons may deliberately seek housing in a place that they have no community connection with. Legitimate reasons for wishing to do this might be to remove themselves from locations with persons who may be dangerous to them (e.g. abusive former partner) or to remove themselves from local areas for health reasons (e.g. a substance user may wish to move away from their area so that they can no longer access their dealer in an effort to stop their substance use). It is arguable that persons with reasons such as these should be supported”.

The need to support these choices should be considered within the policy alongside the allocation of a community connection area to those who have none:

“Not all locals have a connection to a ward or specific area, but they should not be discriminated because they have no local connection to the ward”.

11. Do you think we have grouped these Community Connection Areas about right or would you suggest any amendments to them?

Although most people responded positively to the current community connection area groupings there were some comments suggesting that these were potentially not the right groupings.

Some felt that they appeared random and did not entirely fit:

“Sawl plwyf/ward eithaf 'random' wedi ei rhoi at ei gilydd, e.e. os byddwn am cael ty cyngor yn Cynwyl Elfed, byddwn byth yn ystyried un yn Llanybydder”.

Whilst others felt that they were geographically the wrong size:

“The rural north and rural west a very large areas between locations. There's a big difference saying between Llangfihangel and Cenarth”.

“Some are wide geographical areas, others are smaller areas. The current system can be restrictive when some applicants are flexible over where they wish to live, and this causes delays in rehousing in some areas”

Offer of Accommodation

12. Are two suitable offers of accommodation reasonable for applicants who are not homeless but need to move?

Most people felt that two offers were sufficient in the current climate for people in housing need if these offers were suitable offers.

“Ydy o dan yr amgylchiadau prinder cartrefi presennol. Byddai'n dda, os nad oes ty cwblw addas ar gael, bod modd edrych ar eu sefyllfa ymhen amser rhag ofn y gall ty mwy addas fod ar gael”.

“2 suggestions are ample gives people enough choice especially if they are in great need”.

Many people referred to the suitability of the offer and stressed the need for allocations to be made in line with applicant's needs.

Although some people stated that the number of offers should be open-ended, most felt that restricting the number of offers was fair in a system where resources are limited.

“I do not see why there should be a limitation to choose”.

“If people are in desperate need for housing the 2 offers of housing is more than enough”.

“I've been waiting over a year and haven't received a single offer. I'd probably accept the first one I was given. I think most people are the same if their need is great”.

Comments around the allocation of “sheltered” and “over 55” accommodation were also made with some feeling that this demarcation was unfair and limited access for people with specific needs. In response to this question one respondent stated,

“People under 55 age and can't get a bungalow and is on full PIP”.

Re-registering

13. Should we set timescales in relation to how often someone should have to re-register to remain on the housing register; for example, six months, 12 months, or a different timescale?

There is strong evidence that people are not in favour of a 6-month re-registration period. Although some people stated that the timeframe for re-registering should be shorter than 6 months, most preferred a longer period for re-registering or no need to re-register at all.

“Some people may have found accommodation but not removed themselves from the register, so re-registering is a good idea”.

“I think every 2-3months so people who are truly homeless will get housed faster and people who are just trying to move won’t bother re-registering every 3 months”.

“I think 12 monthly reviews to re-register is adequate”.

Along with a reconsideration of the timeframe for re-registering respondents also felt that there needed to be more help for specific groups to be able to re-register when required to do so.

“The important factor here is communication and the ability to re-register process being easy”.

“12 months would be preferred although the policy should also include an option to automatically re-register for those who are considered unable to do it themselves or find it particularly difficult (e.g. people with learning disabilities, people with support workers, people who have specific accessible communication requirements etc) –automatic re-registrations and automatic bidding are standard for some vulnerable groups”.

14. We will write to you when it is time to re-register your application. Should we provide other options of communication to help people re-register?

Many people understood the phrase “we will write to you” as meaning by letter. Other forms of written communication were suggested such as email and text message. Some people stated that communication by phone call would be helpful, particularly for vulnerable groups, as they may struggle to access technology and/or have issues with literacy.

“Phone call to help people not tech savvy and rely on family to help with this. It's easily overlooked. A phone call to go through the application will give the applicant support and independence to not need to ask for help and subsequently lose out”.

The use of the Hwbs in assisting people to complete this task was also mentioned to enable more people to comply easily.

“Letter with an appointment to the hub to help people re register who can’t use the internet or understand how to do it properly”.

Anything Else

15. Are there any other comments relating to the amendments to the Social Housing Allocations policy you would like to provide?

The transparency of allocation of accessible homes was raised, including what evidence was required:

“I would like you to show more consideration to how you allocate properties that are disabled accessible for people who are not just over 55 or permanent wheelchair users. I see so many accessible properties on Canfod Cartref that are only over 55's and not all of them are in care facilities. Also, not all disabled people are permanent wheelchair users but that doesn't mean that they don't have a high need for accessible accommodation. Especially in cases where a great deal of medical evidence, including OT assessment, has backed up the need for the accessibility”.

Consideration of the bedroom needs of single parents was mentioned as something that needed to be taken account of when allocating accommodation:

“I'd like to see put in place that if you have children that you see regularly and stay with you at that time but don't live with counted as needing a bedroom when you apply for housing”.

Properties that allowed provision for pets was also a concern for people when waiting to be allocated accommodation:

It's not right that we should have to surrender our pets to have a place to live my dog is well trained flea'd and wormed all the time and I need her for my anxiety and depression she gets me outside and keeps my mind away from the negative thoughts”.

Age restrictions on some accommodation was also an issue for some people, believing it discriminated against them unfairly:

“Yes. Stop the age discrimination associated with accessible housing. Why do persons over 55 get all the bungalows?”

A helpful functional comment relating to the citing of “Persons subject to immigration control who are eligible for an allocation of social housing” was made:

“Appendix A – these classes of people change quite regularly (and will probably change again soon) – wouldn't it be better to provide a link to a government source which is updated regularly?”

And finally, the importance of the opportunity for choice and control over one's home was made by one respondent:

“Yes, one last thing. When looking through housing, I notice that the media often just shows the frontage. I think this belittles the needs of the homeless because just because we are homeless doesn't mean we shouldn't get to see photos of the inside of the property to make choices on what would be the most beneficial for us. Remember, if a person can settle in a place comfortably, they are less likely to be homeless again”.

Appendix 3 Summary of responses from Partnership

In Carmarthenshire we operate a Common Housing Register with our RSL Partners. These organisations, together with the Council, constitute 'The Partnership' The Partnership is made up of the following participating RSLs:

- Bro Myrddin Housing Association
- Caredig Housing Association
- Pobl Housing Association
- Wales and West Housing Association

Between December 2023 and January 2024, The Partnership met to discuss the content of the Emergency Policy and provide feedback on its effectiveness and fitness for purpose. The following is a summary of the recommendations from those discussions:

- Update the list of “Persons subject to immigration control who are eligible for an allocation of social housing” to ensure it is up to date (2.3).
- Ensure that the definition of “guilty of unacceptable behaviour serious enough to make them unsuitable to be a tenant of the authority;” is accurate and relevant to restriction from the register (2.4).
- Stipulate that evidence is required for unacceptable behaviour which would give a person no preference on the register and that such behaviour will be regularly reviewed to ensure an individual is not “barred for life” (2.9).
- Provide for accessibility needs when requiring applicants to re-register. (3.9).
- State contact details for where to provide relevant evidence (3.10).
- Refer to the joint-working approach between Housing and Children’s Services when working with homeless 16- and 17-year-olds in a legally compliant way (3.14).
- Include those in any Homelessness Duty (s66, 73 and 75) within Band A (3.16).
- Rename Band A to “Urgent Housing Need” (3.17).
- Clarify the statement to provide evidence from an appropriate professional for medical/welfare grounds (p.12).
- Add any other homeless person into the scope of Band B (p.13).
- Include all social housing tenants (not just council tenants) in the unacceptable behaviour definition within the No Preference group (p.13).
- Stipulate allocations will be into suitable accommodation (4.3).
- Re-order those allocations which are exempt from direct matching to make the list fit for purpose and allow for reporting by partners on such allocations (4.7).
- Include those in Band B for prioritisation of direct matches (4.8).
- Replace the words “tenant” and “tenancy” with “contract holder” and “contract” to align with Renting Homes (Wales) Act (5.6 & 5.9).

Appendix 4 - Revised timetable for approval of final policy

May 2024	<ul style="list-style-type: none"> Analyse feedback and Prepare Final Policy
June 2024	<ul style="list-style-type: none"> Legal – Barrister Checks
July 2024	<ul style="list-style-type: none"> Communities, Homes & Regen Scrutiny Committee discussion – 8th July 2024 Final Version for Political Process
August/September 2024	<ul style="list-style-type: none"> DMT – 23rd August 2024 CMT – 19th September 2024
October/November 2024	<ul style="list-style-type: none"> Scrutiny – 1st October 2024 Pre-Cabinet – 14th October 2024 Cabinet – 4th November 2024
December 2024	<ul style="list-style-type: none"> Council – 11th December 2024
January 2025	<ul style="list-style-type: none"> Members Session Staff Training
February 2025	<ul style="list-style-type: none"> Policy Live