

# Allocations

Understanding more,  
in the context of homelessness in  
Wales

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Commissioned by Community Housing Cymru, Welsh Government, and Welsh Local Government Association

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# EXECUTIVE SUMMARY

In March 2023, the Expert Review Panel tasked with reviewing the existing legislation on ending homelessness in Wales, indicated a need to understand more about localised social housing allocations processes. In response, this piece of work was jointly commissioned by Community Housing Cymru, Welsh Local Government Association and the Welsh Government's Housing Team. The research took place during April and May 2023, and key findings were presented in early June at an all-Wales virtual meeting of stakeholders, including representation from local authorities, registered social landlords (RSLs) and the third sector.

Stakeholders from local authorities and RSLs across Wales participated in this research in a range of different ways, creating a rich body of information to draw on. The research looked at allocations processes through 2 lenses: firstly, at an all-Wales level (through an anonymous survey); and secondly by focusing on 5 pre-selected 'spotlight areas', in which additional data was supplied, and focus groups and 1:1 meetings were held.

Four key themes emerged from across all datasets, creating a backdrop against which more granular findings should be considered:

- There is significant discrepancy between the existing supply of social housing stock in Wales, and the demand. This is particularly the case for 1-bedroom properties. There is a sense that the pressure building in the system because of this inherent mismatch is reaching boiling point;
- Allocations are a part of the 'ecosystem' of social housing, calibrated to take into account multiple factors when determining the best 'match' for a household with a home. Changes to these processes create impacts, potentially disrupting the 'flow' in the housing system at large, so it's important not to view allocations as a 'silver bullet' to the housing crisis;
- Rapid re-housing is generally felt to be the right approach in the current climate, but it needs infrastructure to support its effective delivery. There is a sense that people have increasingly complex support needs, and that support services don't have the capacity to cope in a timely way, to support sustainable tenancies and cohesive communities;

- Every household has particular circumstances, needs and preferences, whether they are technically 'homeless' and owed a duty by the local authority, or not. Taking all individual factors into account at the point of allocation builds sustainability, but it makes it hard to adhere to rigid policies and processes.

This report presents and frames the more granular data arising from the research, to illustrate stakeholders' thinking about how allocations processes interact with the drive to house more homeless households in Wales, and what might be improved.

Recommendations for further research are provided at the end of this report, indicating that it might be beneficial to take a much more detailed look at the data contributing to our current understanding of allocation rates, triangulating this with mapping of local processes.

5 brief spotlight area reports are presented at Appendix 1, each one highlighting a uniform set of key facts for each area, then giving a headline on their local approach, and finally taking a short 'deep dive' into their local allocations processes. Read in conjunction with the rest of the report (which brings together the findings from the spotlight areas with the wider all-Wales data) they provide an informative counterpoint, illustrating the differences and similarities across Wales, in response to the current crisis.

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I would like to thank all those who participated in this work, generously giving their time both for meetings and focus groups, and to put together the necessary data in response to submission requests. It has been a privilege to experience first-hand the knowledge, expertise, drive and professionalism of colleagues in the housing sector in Wales.

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# INTRODUCTION

## Context

At the request of the Minister for Climate Change (Julie James, MS), Crisis has convened an Expert Review Panel to review existing legislation on ending homelessness in Wales. The panel is considering evidence from services and people with lived experience of homelessness, alongside other expertise in homelessness practice, policy and research.

This piece of work on allocations processes is intended to support the panel's deliberations on the issue, as well as contributing to the wider volume of research to support evidence-based policy making. The work has been jointly commissioned by Welsh Government, Welsh Local Government Association and Community Housing Cymru.

This report presents the findings of the work, for the attention of the Expert Review Panel, during June 2023.

Colleagues from across the sector in Wales were brought together in early June at a virtual online all-Wales event, to debate the key findings. At this event, local authorities, housing associations, Welsh Government colleagues and other key partners took part in constructive workshop-style conversations, using the findings as a jumping-off point.

## Process and methodology

Data-gathering took place during a 6 week period from April - May 2023:

- **At an all-Wales level**, there was an opportunity for all housing association Housing Directors and local authority Heads of Housing across Wales, to submit responses to an anonymous survey. This aimed to capture qualitative feedback on the approaches to allocations in different parts of Wales, and ideas on what could change. The questions from the survey are available at Appendix 2. 45 responses were submitted: 23 from local authorities and 22 from registered social landlords (RSLs).
- **In 5 pre-selected geographical locations (the 'spotlight' areas)**, we sought to understand the approaches to allocations in more detail. In these areas, local authority and housing association colleagues participated in focus groups and 1:1 conversations, from which qualitative data was drawn. Participants in the spotlight areas were also

asked to respond to an additional data submission. The questions which formed the basis of this additional data request are available at Appendix 3. The spotlight areas selected for this more intensive work were:

- \* Carmarthenshire
- \* Cardiff
- \* Wrexham
- \* Neath Port Talbot
- \* SARTH Partnership (Single Access Route To Housing Partnership, across Conwy, Denbighshire and Flintshire)

Written pieces on each spotlight area are presented as a compendium at Appendix 1. All 5 pieces are presented in the same format and include: key facts; a headline encapsulating the area's position on allocations; and a short 'deep dive'.

## Scope

The brief for this work was to:

- Understand the rates of allocations to households at risk of, or experiencing, homelessness in the spotlight areas, and to understand any differences in definitions.
- Understand who else, other than those who are homeless or at risk of homelessness, is allocated social housing in Wales in the spotlight areas.
- Generate evidence on the barriers to allocating properties to homeless households. This could include (but is not limited to) barriers linked to the approach locally (for example choice based lettings, nomination agreements, pre tenancy requirements, residency requirements, political pressures), barriers in legislation/regulation/guidance, and wider barriers including stock condition, availability and supply, stock profile, availability and access to support service and wider preventative activity.
- Explore and capture proposals for change to legislation, funding, policy and guidance that would support the local approach to allocations to homeless households, and the opportunities and risks associated with this.

## Drawing on the data

This report presents the key themes and findings which emerged from across all the datasets. Where there were obvious differences between the findings arising from the all-

Wales anonymous survey and the data submissions or qualitative work in the spotlight areas, this is highlighted and made clear. Where there was striking convergence of the findings across both the all-Wales and spotlight-level data, this is also noted.

No individual participant or organisation is named in the presentation of the findings (apart from the spotlight areas, where relevant) and all verbatim quotes have been anonymised.

# WHAT WE HEARD: STAND-OUT POINTS

Some stand-out points emerged across all of the data, whether through 1:1 conversations and focus groups in the spotlight areas, in the anonymous survey submissions, or as free-text commentary in the additional data submissions from spotlight-area respondents.

Because they came through so strongly, they are presented here, as a backdrop to the more specific and granular points which follow.

## Supply/demand mismatch

- There's a finite supply of stock, and lists are increasing (seemingly exponentially);
- The pressure in the system is growing with no visible let-up;
- The issue will not be solved by revising allocations processes, although marginal gains might be made in some areas.

## The 'Ecosystem'

- Allocations policies are part of an ecosystem, and changes to them create impacts in other ways;
- Allocations processes are not a 'silver bullet';
- Allocating more to homeless households disrupts the 'flow' through social housing, creates different types of work, and drives new incentives into the system.

## Infrastructure for support

- Rapid re-housing is generally felt to be the right approach, but it needs infrastructure;
- There is a sense that applicants and tenants have increasing support needs, and services don't have the capacity to cope;
- Can we achieve rapid re-housing without the right bits of the jigsaw in place?

## Everyone is different

- Everyone is different. So when we ask: 'Who is being allocated social housing, if not those who are homeless?' the answer is complex;
- Taking needs, preferences, and circumstances into account builds sustainability and cohesive communities, but it makes it hard to adhere to rigid policy and process.



## VARIATION IN LOCAL APPROACHES

Whilst it wasn't the purpose of this research to exhaustively compare and contrast the similarities and differences in allocations processes across Wales, the data gathered inevitably highlighted some variations which are note-worthy, and are outlined in this section.

### Common housing registers

Of the 45 respondents to the all-Wales survey, 7 indicated they do not operate or belong to a common housing register. Across the spotlight areas, Wrexham and Neath Port Talbot do not use common housing registers, whereas Carmarthenshire, Cardiff and the SARTH Partnership do.

In the all-Wales anonymised survey, Question 5 asked 'what do you think works well about the current approach to allocations in your local area?' In response to this question, many respondents used the free-text area to specify that the common housing register is a strength.

The following examples from the anonymous survey data indicate more specifically what people feel the strengths of a common housing register are:

- Single point of entry for an applicant
- Clear, transparent and easy to understand
- 1 set of rules for everyone
- Ability to monitor allocations to ensure consistency
- Good common source of data to understand local need and respond accordingly
- Efficiency and lack of duplication
- Collaboration around improved customer service for applicants
- Consistency of service to the applicant

### Levels of nomination agreements

RSLs were asked via the all-Wales anonymous survey to indicate what level of nomination agreements they operate with their local authority. There was a wide range of responses in relation to this question, and respondents chose to articulate their local arrangements in various different ways (this was a free text question) so the responses do not give a categorical picture of the levels across Wales.

However, most seem to be operating a high level of nominations. 12 responses state that they have 100% nominations (although in cases where an RSL operates in multiple local authority areas, some say that the 100% agreement may be operational only in one of those areas). Not all of these responses specifically state that there is a nomination agreement in place (one simply says 'all our vacancies are allocated to applicants on the LA's register').

There is a notable exception in 2 cases, where the responses directly state that they have no requirement for nominations in place at all.

In many cases where a response states there is a 100% nominations agreement in place, this is accompanied by the flexibility to operate a certain number of lets outside of the agreement (referred to variously as 'management lets', 'management transfers' and 'transfer rights'). A number of these responses refer to a 10% agreed quota on this type of let, but 1 response mentions a 5% quota, and another indicates there is no limit on this type of let.

When looking at the spotlight areas, additional insight can be drawn around the potential correlation between higher levels of nomination and higher allocation rates to homeless households. For example, colleagues in Cardiff stated that they have at times achieved a 100% allocation rate to homeless households (although the 21/22 data on which this research drew indicated 60%, which is still the highest allocation rate across the spotlight areas surveyed).

There were some particular strategic and operational mechanisms at play in Cardiff which seem to point to their success in achieving high levels of allocation to homeless households, including:

- Strong partnerships (evident during the focus group) across RSLs and the local authority
- Participation in the common housing register
- A particular type of banding system, and use of homeless 'gateways'
- Agreements across the partnership to flexibly respond to periods of high need by implementing a 100% nominations period, but then returning to lower agreed levels once the period is over

There are of course particular geographical and demographic factors to take into account in Cardiff, not least that it is the capital city of Wales, and has the largest student population in

the nation. However, further in-depth consideration of their approach (particularly around the flexible nominations levels, and the banding and gateway systems used) might bear fruit when developing any thinking on consistent pan-Wales approaches to allocations.

## Local processes and policies

In their spotlight conversation, Carmarthenshire colleagues particularly highlighted how vital local political support had been to their radical recent shift in allocations policy. They have achieved a huge amount of change within the space of less than a year.

In contrast, the anonymous survey data indicates different experiences in other parts of Wales. For example, one respondent states:

‘Political views (ie of Cllrs) can be a **barrier to a change** in policy.’

Another says:

‘**Local Connection is a big consideration for politicians.** Clearer direction on allocations policy and legislation for homeless would mean there would be no room for the “who deserves and who doesn’t” question... **homelessness is still sadly very stigmatised – often associated with ASB, bad tenants, rent arrears, drugs, criminality and MH issues.**’

There is also the issue of how local connection criteria are applied, depending on a household’s status (because of the legislative levers which are triggered when certain duties come into play) as indicated in both these responses to the all-Wales survey:

‘**Local connection (5 years) is a barrier**, until they work their way through the homeless system to s75.’

And:

‘**Local connection is always sensitive as we have a 5 year requirement for social housing, and yet those with a homeless duty are able to bypass this**, which can be seen as unfair. We already give preference and place homeless persons in an eligible band, in the main.’

As well as local policy-making being subject to local political processes, it also involves negotiation between the local authority and RSLs on the factors that will be taken into account when a household is matched with a property. This can be 'baked in' to the agreed allocations policy, or considered as exceptional, and dealt with through local lettings policies, sensitive let considerations, or management transfer quotas. RSLs will then have their own processes and systems for managing those exceptional matches.

During the focus groups undertaken, participants talked about how there is consideration during the allocation process of factors such as former tenant arrears, previous history of anti-social behaviour, and an individual's history of substance misuse. These considerations were discussed transparently, and understood to be a part of the way the processes operate locally. However, in the anonymous survey, some responses indicated that these factors present a barrier to allocations, and suggested that they are sometimes applied inconsistently:

**'Former tenant arrears - inconsistent assessment** of previous arrears some will be eligible based on large arrears and others with smaller arrears made ineligible.  
**Offending history** - some applicants made ineligible due to minor offences inconsistent approach. Sometimes reviews against ineligible cases do not take place for 12months reason for this is RSL wishes to evidence ability to manage a tenancy, regardless when managing in TA. Some applicants not offered specific property due to **utility costs making it unaffordable**. Requirement of adaptations and RSLs will only allocate to a ready adapted property. Cherry picking, current numbers in TA allow for a larger pool of applicants.'

One local authority response to the anonymous survey reflects:

'Whilst RSL partner compliance on the common waiting list is high, there are still areas where our housing approaches are not fully aligned. For example, there are small differences of criteria restrictions between some RSLs and the Council i.e. **maximum occupancy levels for specific property types.**'

Another states:

**'Local lettings policies** can get in the way. **History of rent arrears or ASB** can put them in a non-preference band where they would not get an allocation.'

And another says:

**'Requirement for an applicant to evidence that they are tenancy ready** and time spent in TA does not always count to evidencing this. Unrealistic expectations on the part of the RSLs in relation to an applicants history. **Pet policies** need to be relaxed more realistic."

In a few of the all-Wales anonymous survey data responses from local authorities, strong views were expressed on the degree of discretion RSLs have, and how they exercise this discretion, for example:

**'Not enough allocations via allocations process can allow cherry picking** and not necessarily allocating to most in need. Whole operational process varies per RSL so difficult for applicants.'

And:

'Reluctance of certain partner organisations to fulfil their homeless obligations with regard to TA and discharge of duty. **Reluctance to allocate homeless/ challenging applicants on a secure basis.** This may result in a divide between council and RSL properties with the LA housing majority.'

The array of differences in local process, brought about by political discretion, partnership negotiations, and local policy-making, can have a significant impact on how allocations processes are operating 'on the ground'. There are many points within the 'allocation journey' at which local policies have the flexibility to differ by area, and the impact of those differences, cumulatively, are likely to be significant. It is not possible from the scope of this research to indicate whether those impacts are positive, negative or neutral in terms of allocation rates to homeless households, but further detailed mapping might highlight how each decision point in the journey impacts on overall allocation rates.

# RATES OF ALLOCATION TO HOMELESS HOUSEHOLDS

Given the significant local variations of approach, it is very difficult to point to potential areas of correlation between approaches and allocation rates.

It's also important to caveat the allocation rates which appear in the spotlight pieces at Appendix 1. The scope and time constraints of this research did not allow for scrutiny of the data at the level of assessing the technical specifications guiding its extraction from each organisation's IT system, which categories of household were or were not included, and how households are categorised within that system in the first place. Only this level of detailed scrutiny would allow for confident direct comparison between each area's allocation rate.

With that caveat in mind, it is still interesting to note that rates of allocation to homeless households across the spotlight areas vary from 23% to 60%<sup>1</sup>.

Participants outlined many reasons why rates of allocation to homeless households are lower than 100%, and in some cases significantly lower. These are addressed throughout the body of this report, and include:

- The mismatch between supply and demand of available housing stock, particularly 1 bed lets and larger properties;
- Taking into account individual circumstances (including health, family connections, and history of trauma) in relation to the type of property available, its location, and the local community;
- The need to take into account local policies which affect the ability to make a match between an applicant and a property (from rules around local connection, to consideration of former tenant arrears);
- Consideration of whether support services will be in place to ensure a tenant is able to sustain the tenancy if a let is made.

In the qualitative exploration of barriers and challenges in the spotlight areas, there was no obvious correlation between those areas with a particularly low level of allocation, and

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<sup>1</sup> Data was requested from spotlight areas for the financial year 2021/22 (the latest full financial year of data available) - see Appendix 3, questions 3.2/3.3 and 4.2/4.3

associated 'outlying' or 'unusual' commentary around particular barriers and challenges which might preclude them allocating to homeless households. For example, every spotlight area raised the lack of 1-bed housing stock, as well as rising waiting lists and increased numbers of people in temporary accommodation, yet the allocation rates to homeless households still vary dramatically.

The spotlight pieces at Appendix 1 highlight the particular circumstances of each area in relation to their allocations processes. They present real variation of approach and focus, from Carmarthenshire where recent radical change has depended on local political support, to Wrexham who highlight challenges around phosphates and a ratio of 20:1 demand vs supply of 1 bedroom housing stock, to Neath Port Talbot where there is no common housing register around which partners can base their operational conversations and strengthen partnerships.

Nominations levels vary in each spotlight area. For example, across the SARTH Partnership, there has been a temporary 50% nomination agreement in place since 2020, which is now under review. It is within the SARTH Partnership area that we see the lowest rate of allocations to homeless households (23%) when using the 2021/22 data. Cardiff operates a flexible quota for lets to priority needs groups, and at times have reached 100% allocations to homeless households. However, with such a small data sample it isn't possible to draw a line of causality between higher levels of nomination and higher levels of allocations to homeless households.

Further research into each of the spotlight areas could fruitfully build on the initial research presented in this report. Areas for consideration might include a very detailed dive into:

- The figures contributing to their reported allocation rates, looking at exactly how they 'pull' the data from their systems, how they categorise applicants owed a duty and contribute those into the data count;
- Intensive scrutiny of their local policies around elements of the allocation process (such as how they deal with former tenant arrears, history of antisocial behaviour, and support needs relating to substance misuse), all of which contribute to who is allocated a property and who is not;
- Detailed mapping of the 'allocation journey' from the point of a property becoming available, to the point of a household taking up residence, highlighting 'decision points' along that journey.

## SUPPLY & DEMAND

Question 9 of the all-Wales anonymous survey asked: 'What are the main barriers to the allocation of housing to those who are homeless or at risk of becoming homeless?' (multiple selection of pre-determined answers was allowed). There was overwhelming congruence in the selections made by respondents, with the vast majority (42/45) citing 'supply of suitable housing' as a main barrier. Of those, 4 cited *only* this barrier (making no additional selection). 34 respondents indicated 'stock profile', although none of those cited it as the *only* barrier.

Certain themes also came through in the free-text responses allowed under the 'other' category. The following barriers, relating to supply of stock, were independently mentioned in multiple responses through the free-text function:

- Lack of 1 bedroom properties (3 responses mentioned this barrier)
- Lack of larger properties for housing large families (3 mentioned this barrier)
- Lack of adapted accommodation (2 mentioned this barrier)

Whilst the number of responses for each type of barrier is low, the similarity is interesting given there was no prompt and individuals were free to write whatever they wished.

A number of the free-text responses to Question 7 of the all-Wales survey ('Which kind of household/individual do you allocate housing to most frequently?') also illustrated the point around lack of 1 bed housing. For example, the following response:

'When considering the homeless cohort (almost 200 households in Temp & emergency Housing) 1 bed households account for approx. 84%, so **our take up on the 50% homeless direct lets (current policy variation) is a significant challenge due to this disparity between available homes and the local demand profile.**'

The lack of general needs 1 bedroom properties also came up in the focus groups and 1:1 conversations across almost all spotlight areas. In some areas, it was possible from the data to establish roughly what the ratio of demand to supply might be. For example, the Wrexham spotlight data<sup>2</sup> shows demand for 1 bed properties outstripping supply by 20:1.

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<sup>2</sup> Checked and verified with the local authority colleagues involved, using 2022/23 data



The strength of feeling around the mismatch between supply and demand was palpable in responses to the final question of the all-Wales survey (Question 13), with 2 particular responses highlighting the impact of the issue in the wider context of social housing in Wales:

‘There is a shortage of homes for households. We need more homes for social rent and more affordable homes to leave social rent for those most in need. **The stock type is critical as it is becoming increasingly difficult to accommodate larger families and younger single people** as these types of homes are in very limited supply and more difficult to increase supply due to planning and viability issues.’

‘**The demand for housing outstrips supply year on year. Whilst new properties are being developed still the demand grows.** Using the precious resource of social housing differently should be considered. Do we only accept applications from those in urgent need? Should we exclude those who can afford to buy their own properties? The expectations of people registering for housing is unmanageable - especially when supply is so limited. It would be an easier message to deliver if there were other housing options that could be just as effective. Unfortunately the PRS sector is difficult to secure due to the exceptionally high rents in all areas and the very low LHA rates available. This also makes it difficult to get landlords to work with the LA as they can get more money from the open market.’

When asked what the most important driver is in determining who they allocate housing to, survey respondents identified homelessness as the key driver in the majority of cases (23/45 responses). However, many of the free text answers also mentioned the stock supply as a major barrier to delivering on this priority driver. For example, one respondent stated:

‘Our choice based letting policy is based on housing need, therefore currently the main driver is addressing homelessness at the present time. However, **due to the very limited housing stock available, rehousing is slow and stagnant** with many individuals being in TA for over 18 months.’

Another wrote:

‘Our driver is to rehouse those in the most urgent need as identified in the code of guidance. These are generally homeless applicants owed a homelessness duty but

are also applicants living in supported accommodation as their moving will assist homeless individuals to be move into supported accommodation. **The focus is on allocating properties to the increasing number of households becoming homeless. However the availability of stock in the required areas are a challenge.**'

Another response makes it very clear that decision-making is driven by stock type and availability:

**'The availability of housing stock determines who we allocate to** i.e. single person or family. In most cases we currently look to allocate our vacant homes to homeless applicants unless a property will not be suitable due to it being a sensitive let.'

These comments illustrate a significant theme throughout this research: that whilst the driver may be to house homeless households, in a system with finite stock and such high demand, the ability to respond effectively to the 'driver' is seriously compromised.

# WHO IS BEING HOUSED, IF NOT HOMELESS HOUSEHOLDS?

Significant complexity emerged in response to this question. Participants mostly pointed to the fact that individuals may have high levels of need whether they are owed a homelessness duty or not, and that housing professionals are therefore taking into account the balance of need across their waiting lists, whilst being mindful that those owed a duty should be prioritised in line with local policies.

Increased complexity arises from the fact that the availability of a vacant property is very restricted, and when a property comes up, a whole range of factors must be considered in terms of its suitability for an individual or household on the waiting list. This not only relates to the property itself (number of bedrooms, whether it has steps up to the entrance, which floor of a building it is on, whether it is accessible internally, and other factors) but also relates to considerations of the wider community, block of flats, development site, or even local area it sits in.

The interplay between individual circumstances and an available property was illustrated by one focus group participant, who talked about someone's needs in relation to the area in which they might get housed:

'We have a property in a county lines heavy area so we obviously don't want someone with a heavy drug use history going into the property, as it would really trigger them. So **we go through the list over and over again, in order to try and get the right person into the property** (seeking references from 3 different departments...calling the departments to find out about the person because we can't see the full information on the shared system, such as information about drug use.'

In the focus group conversations, participants talked about the significant levels of need amongst people waiting to be housed, regardless of whether they are owed a duty by the local authority or not. Many identified overcrowding and sharing facilities as particular problems, with the sense that overcrowding is increasing:

'We have people on our register in housing need (you're only on there with identified housing need). **One of the biggest issues since covid has been overcrowding -**

around 300-400 people on the current register are in overcrowding. **Any one of them could present as homeless at any point.** But we're just talking [here] about people who are 'open to the homeless team'. All these [other] people have nowhere else to go.'

The need for people to move on from supported accommodation, or refuge facilities, was also cited as a pressure on available properties, which are then not available for housing those who are homeless.

Participants also talked about people having significant medical or health needs, or wider welfare reasons which mean they are in high need of being housed, even though they may not be 'homeless' at that time.

Whenever an allocation is made, housing professionals are working together to balance the individual needs, circumstances, rights, wants and choices against the stock availability, setting, and suitability. They are also taking into account the 'flow' through the system, and whether their allocation will free up another vacant property, to create another opportunity for yet another household to be housed.

The following example, from one of the focus groups, shows why an existing tenant might be housed when a vacant property becomes available, despite there being homeless households on the waiting list:

'We had an individual displaying anti-social behaviour and high levels of arrears. The police were there constantly, and we were having to pay to have security in place. We had to look at eviction, but the eviction was pulled on the day because we can't evict into homelessness. The neighbours were really upset and our team were having to deal with a lot of complaints. We couldn't see a solution. So, a property comes up, and we can see that **allowing a management transfer for this current tenant will alleviate the pressure on the community.** It's not an 'ideal fit' as the property might be in a high demand area, and there's another person on the waiting list who's in the private rented sector and at high risk. But **we also know we are freeing up an existing property by making the management transfer. So we solve 2 problems at once** (better community cohesion, and a free-d up property) when we house this existing tenant rather than someone from the list.'

When asked who they house the most, respondents to the all-Wales survey overwhelmingly stated 'families'<sup>3</sup>. The second most frequently selected responses were 'Aged 55+' and 'Single person (not high-risk/complex needs)'<sup>4</sup>. It is significant to note that in the free-text responses to this question, alongside their selections, respondents reflected on the fact that their allocations to these groups were often driven by stock availability. One response simply states:

'This is **linked to current housing stock profile.**'

Another says:

'**Around 5% of all social housing in the county is for single people under 55. Approx 32% of the applicants registered on the housing register require 1 bed general needs** accommodation. Whilst this is a stock profile issue and not a Policy issue, the challenges of demand across 2 beds and the impact of the bedroom tax make under occupying social housing a challenge.'

In relation to the frequent selection of 'Aged 55+', the free-text answers give some insight into the fact that the separation of stock specifically for this age group has an impact on the availability of lets, thereby reducing the lets to those under 55, who cannot be housed in those properties:

'**Older people tend to be housed much quicker** than other single/couples applicants (assuming they do not have significant mobility issues) as there is a **relative oversupply of older persons housing**. That said the expectations of older people is often to access bungalow type accommodation with access to gardens and these are not always in plentiful supply. Therefore those over 55's (our definition of older people) who are willing and able to live in flats will often be rehoused most quickly.'

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<sup>3</sup> This was a question with multiple pre-determined responses, from which participants could choose more than one response. 32/45 responses indicated 'families', of which 10 selected *only* the 'family' response (making no other, additional, selection)

<sup>4</sup> Both of these categories had 18 responses

## Who's 'homeless' and what's the focus on prevention?

As a part of the conversation around who is housed, some participants spoke about the fine line between those households owed a duty, and those at imminent risk of becoming homeless. One participant said:

**'Anyone in Band 1 could suddenly present as homeless...** So how does that work? If someone presents to homeless team, if they are already in housing, they're not at 'immediate' risk. [But] what is *immediate*? The Homeless Team is doing preventative work - if someone is getting into financial difficulty then they'll work with them. [But the] Homeless Team will only keep a case open for 56 days. The guidance needs to be clearer - who should the homeless team accept? When? At what point? Do we want more presentations into homelessness? Are we trying to prevent that? **We have to make sure the allocations policy fits in with the homeless policy.'**

On this topic, one of the responses to the all-Wales survey also stated:

**'Homelessness prevention duties also need to be extended,** as in the current climate 56 days is far too short to offer a solution in most instances.'

Another survey response talked about localised work being done to address this issue:

'Currently, cases that are threatened with homelessness are given additional priority on the general waiting list, but they are not managed through the dedicated homeless waiting list. As we are currently offering a high proportion of lets to the homeless waiting list, cases outside of this can be overlooked in favour of homeless applicants. We recognise that **this can result in cases becoming homeless before we have an opportunity to prevent homelessness by providing alternative accommodation.** We are currently reviewing this system and working to understand the impact it might have in moving these prevention cases onto the homeless waiting list, together with homeless households.'

## WHAT COULD BE IMPROVED?

All participants were asked how they felt the current rates of allocation to homeless households might be improved (both through the all-Wales survey, and during the focus groups and 1:1 meetings) and whether they thought the levers for change might lie with legislation, guidance or policy-making. When asked how things could improve, the following key themes emerged across all the datasets:

- Increased supply of housing stock, particularly 1 bed units
- Support for applicants & tenants
- Less discretion to let to non-homeless households
- Digitisation, both for the applicant, and between organisations
- Managing expectations about who will realistically be housed

### **Increased supply of housing stock**

A number of participants suggested that acting on the 'supply side' of the problem, through innovative approaches to developing new housing stock, was an important area for improvement. Although this was understood to be out of the specific scope of this work, participants mentioned the following areas for further exploration, as part of the focus groups and 1:1 meetings:

- Grant programmes to improve or alter existing properties so they become suitable to let, including loft conversions, extensions, allowing overcrowding where there is capacity for the expansion of homes;
- 'Innovative use' schemes developing non-traditional accommodation such as the use of shipping containers, pods and garages (and sharing good practice in these approaches across Wales);
- Relaxing the specifications around what kinds of housing can be let, recognising that a home, even if in need of some alterations, may be better than no home;

Participants generally felt they needed more flexibility and investment in order to tackle the supply-side of the problem in new ways.

## Support for applicants and tenants

The issue of increasing volume and complexity of support needs came through very strongly in both the survey and focus group data. The implication (sometimes explicitly stated) was that homeless households have higher and more complex support needs than non-homeless households, and that if more homeless households are to be housed, yet cohesive communities sustained, there must be increased support infrastructure to accompany that change.

Some local authorities indicated that RSLs may be unwilling to let to households with high levels of support needs:

‘Rapid Rehousing will be difficult for those with multiple complex needs as **engagement is a choice and whilst wrap around support is available, this does not always appease landlords** and we anticipate that many will still be reluctant to offer housing to those not engaging in support, as they have more tenants accruing rent arrears or displaying serious ASB.’

Whereas some RSLs indicated that support need costs must be met in order to sustain tenancies effectively:

‘An understanding and willingness on the part of the LA to accept that **support needs have to be paid for**. They could support far more through the Intensive Housing Management system (which does not come from their own or WG funds) and is there to support tenants at risk of not sustaining their tenancy which can be applied to the majority of those coming through as homeless.’

When asked in the all-Wales survey what could be improved, 17/45 respondents cited ‘support’ in their answers, referring to the complex needs tenants present with, the need to support people to establish and sustain a tenancy, and/or the need to engage with a wider range of statutory services. 4 of these specifically mentioned mental health services. The following 3 free text responses illustrate the points made around support:

‘...More needs to be done to strengthen support services available for applicants with complex needs and a **focus on strengthening and changing the temp accommodation offer** with funding for better quality temp accommodation where **support needs can be met while the applicant is awaiting a housing offer.**’



‘Support needs being identified early, appropriate timely support when needed (including health/mental health support) and **support to help address historical financial needs pre allocation.**’

**‘Increase the supply of supported housing for homeless applicants with complex needs. Also increase the Housing Support Grant funding** so that waiting times for tenancy support can be reduced and recognise that some individuals will have support needs long term in order to sustain a tenancy.’

Throughout the focus groups and 1:1 conversations, participants cited the need to engage with other sectors (particularly health and policing were mentioned) in order to secure the necessary support to build effective sustainable tenancies and cohesive communities:

‘Stronger partnership working with **statutory agencies - duty to cooperate** with RSL’s for agencies such as social care, mental health, health, Police and homelessness services for the most complex needs cases.’

## **Less discretion and flexibility**

When asked about areas for improvement, many local authority respondents to the all-Wales anonymous survey suggested that less flexibility should be given to RSLs to determine who they house. Some indicated that legislation might be necessary:

**‘Tightening up the duty of RSL’s to help alleviate homelessness** in some way both with regard to TA and allocations. More emphasis for RSL’s to prevent homelessness and have zero % approach to evictions. If housing first fully adopted then this needs to be rolled out to RSL’s as well as LA’s. Consequences need to be brought in (especially with the removal of intentionality).’

**‘There needs to be more power and enforcement around the duty to cooperate within legislation on RSL’s.’**

**‘Duty on RSLs** to co-operate with Homelessness Services. Tighten up reasonable offers.’

**'KPI's and targets for RSL's to accommodate homeless households;** Statutory obligation to adopt a 'no evictions into homeless protocol' to work in partnership for help with evictions if they do take place; ...more flexibility for direct lets to the RSL's; Increased accountability from the RSL's to assist local authorities with supply and demand to help prevent and alleviate homelessness; **Restrictions on Local lettings plans and sensitive lets.'**

'Provide a guide on the **quota of lets to be made to homeless households for RSL's** to comply with as a minimum.'

**'More restrictive rules around local lettings policies and sensitive letting arrangements.'**

**'More emphasis on the duty of RSL's** to take their fair share of homeless applicants – look at quota's?'

Some responses don't refer to legislative solutions, but still suggest reducing the variation in local policies:

**'More consistency in policies particularly around exclusion criteria** e.g. former tenant arrears.'

**'A reduction in the number of LLPs and sensitive lets** and more access to housing for those with complex needs/ debt levels.'

Other responses to the all-Wales survey suggest improvement may be driven through changes to the rules around discretion on 'local connection':

'The **removal of the Local Connection for people who have had a full homeless duty** (Section 75) accepted and placed in temporary accommodation. At the moment a homeless applicant could be in band 2 until they meet the 5 year residency rule, thus reducing the possibility of being allocated social housing. This then puts pressure on the homeless department to seek suitable accommodation within the private sector in order to discharge duty. Homeless clients who are victims of abuse are automatically placed in the urgent banding and deemed to have full

Local Connection regardless of the time spent in the local authority.'

'Our allocations policy already has a banding process which puts homeless customers as a priority for rehousing, however, there are local connection criteria, local workers schemes etc which means that **they are sometimes not always prioritised for some of the lets** - predominantly RSL properties.'

It is important to note that whilst these responses emerged strongly in the anonymous survey, an alternative view came through in the focus groups and 1:1 meetings. In those settings, some participants were very clear that the flexibility to match the right person to the right home in the right place, with a view to the wider ecosystem, was considered to be vital. One participant said:

'[We] work really hard to match someone. [We] won't just match someone to the number of rooms. [We'll] also look at all their other needs in order to achieve a sustainable let. **[We want to] make sure [we're] matching applicants appropriately.**'

And another said:

'Every day that someone is in temporary accommodation the cost is huge. [We] know that the local authority will want to support people out of temporary accommodation in order to get new people in, but **with a bit more caution and time taken, that one person might not skip back to the start of the cycle, but would rather be sustained.** People can sometimes be housed inappropriately, for example in the same area they initially had their crisis in. For some people this has devastated their lives. **[We] want to break the cycle, and help people break that cycle by putting them in the right place.'**

## **Digitisation, both for the applicant, and between organisations**

When asked what might improve the current allocations systems, a number of responses to the anonymous survey suggested customer-facing digitisation:

'**Better data for applicants to clarify timescales for rehousing** to encourage them to make decisions on housing type, tenure and location etc.'

‘Digital access to applicants should be improved to **register/update their information.**’

‘Digitisation of the application process / **single point of access** for housing help.’

‘**Managing customer expectations** by developing a digital platform which helps customers understand if they qualify for social housing and how long they will wait for an allocation.’

Other responses talk about data in the context of how RSLs and local authorities operate together as partners. This is presented both in terms of access to management information for monitoring and development purposes, and in terms of access to information about applicants for operational purposes:

‘We have very **regular data** (for our RSL and other RSLs) from one LA, but less so from some other local authority partners.’

‘More information including risk assessments which we currently do not receive which poses risks for our colleagues visiting 'blind'. This could be resolved by the LA allowing us to **access their system** as other LAs do. We do not have access to both their systems - need to change their systems as **extremely time intensive** and can take half a day to shortlist for 1 property.’

‘Access to information regarding homeless applicants in supported accommodation could be made easier so that we can **assess the suitability of offers more quickly**. Currently we have to contact the council to request this information and this can hold up the lettings process.’

‘...It is **not easy for us to receive statistics** of need in our operational areas.’

In the focus groups and 1:1 conversations, this theme of digital systems not adequately supporting the shared partnership processes of allocation also came through. In some areas, RSLs talked about having to contact multiple departments within a local authority to find out sufficient information about a household in order to match them with a suitable property.

Whilst these suggestions do not draw a line of causality between the improvement of digital interfaces and the allocation of more housing to homeless households, they indicate areas of the current system where gains in efficiency, transparency and communication might lead to overall improvements. There is, of course, the potential for this to have a positive impact on efficient, coherent, and united systems across local authorities and RSLs, which drive towards common goals; for example, the ambition to end homelessness.

## Managing expectations about who will realistically be housed

This was a strong theme emerging from the qualitative data gathered in focus groups and 1:1 meetings, and also came through in some of the written responses to the all-Wales survey.

Respondents articulate it in slightly different ways, but all are pointing towards the fact that if homeless households are to be given the highest priority, and the level of demand from this cohort is so large (and growing), then given the finite amount of social housing stock in Wales, is it reasonable to think that those in other cohort groups will realistically be housed? And if not, is it better to make this clear so that applicants' expectations are managed?

Some of the responses frame this in terms of communication with people on the waiting list about waiting times:

**'Many applicants with low priority do not have realistic chance** of housing and need alternatives to social housing such as PRS. Council need to set realistic expectations to applicants.'

Some suggest it might be better to restrict entry onto the register:

'There is a lot of waste in the system as people apply for housing and are accepted on the common register when they have no immediate housing need. It would be **beneficial if there was an ability to decline applications from people with no need** for housing as staff could focus more time in supporting people in need.'

Others suggest specific changes to the guidance:

'Meeting the **aspirations of the public** is also difficult as there is not enough supply of social property available to meet demand. We believe that the Government

**guidance code on letting and homelessness needs to be updated** to reflect the increasing pressures there are on housing registers particularly the growing challenge on housing the homeless. While the guidance code deals with **reasonable priority and extra priority**, it is now believed that that framework needs to be updated and modernised.'

## Focus on the longer-term

In a number of the focus groups and conversations, participants articulated their concerns about intervening in the short-term to deal with the current housing crisis, in a way which doesn't take account of the longer term.

For some, this was about the fact that interventions legislatively or on the supply side may take too long:

'Should there be a legislative response to this? ...**by the time the legislation gets implemented it will be way out of date!**'

'The development and delivery programme is struggling to keep up. [We're] stuck now with the legacy of 'trying to include everyone' which is where policy was a few years ago. So the current development plans can't keep pace....they're not focused on those in greatest needs. **Some of the plans developed now which were in concept 3 years ago will not be suitable for people in greatest need** - wrong type of property in the wrong area. [We] need to readjust the development programme to meet [our] priorities. **There will be another 3 years before the system responds. There's a lag.**'

For others, it was about the need to appreciate the long-term effects of allocating housing in a way which might not be optimally focused on the needs of the household in question:

'Does it really make a difference to the numbers? Probably not. Those tenancies will likely fail within the next 12 months. **In the numbers game it looks good on paper. But how many of those tenancies actually succeed for a 12 month period or more?** Can we evaluate the reasons for bringing those tenancies to an end? Was it ASB or something else? We need to closely analyse that.'

'[We'd] really like to do some longitudinal work to see how often people pop back up if they have been moved on quickly. **[We] want to know what the 'revolving door' rate is.** If [there's] an 80% recurrence rate then there's clearly an issue. If it's more like a 2% rate then things are working well.'

And for some, the 'ask' is for clarity around the long-term vision, so that the sector can get around the vision and work towards it in a cohesive way:

'When we're talking about homelessness what does it actually look like? We're only talking about people who've had a notice. That misses a lot of people. **The definitions are vital...The guidance needs to be clearer** - who should the homeless team accept, when, at what point? Do we want more presentations into homeless? Are we trying to prevent that? **We have to make sure the allocations policy fits in with the homeless policy**...Welsh Government need to be clearer on the message - what do they mean by 'homeless' and 'rapid rehousing'? ...**Everyone is interpreting it quite differently. This is where the gaps are! Everyone thinks they're going to do the right things but they are doing it all differently.**'

# CHOICE

The issue of choice pervaded many of the conversations held as part of this research. Operating with a finite supply of housing stock, and waiting lists which demonstrate demand significantly outstripping supply, 'choice' is something that housing professionals across Wales are still trying to offer, but are finding increasingly difficult to accommodate and administer:

'Social Housing is a last resort tenure at the moment - we once had an aspiration where it would be a tenure of choice - people would want to live there. But **the reality is that if people are in social housing now it's often because they have no other choice.**'

One participant summed up the inherent tension between trying to allocate housing purely in line with the legislation around 'suitability' whilst also trying to offer choice to increase the prospect of the let being sustainable:

**'Suitability is cut and dried within the homelessness legislation: 'does it meet needs in terms of size and availability?'** Housing professionals want to offer as much choice as they possibly can, but **the reality is that people in social housing don't have the same levels of choice**, and people on low levels of income don't have the same levels of choice. They are trying to operate within this reality. When we think about what makes a property suitable, we think about local connection, amenities, support networks, communal vs own entrances, a space outside and car parking etc - all the things that impact on the sustainability. But **housing option officers have to work within very constrained parameters of what is considered 'suitable'** and they have a huge number of people coming through the system who they have to try and house. So basic needs of shelter are met by that - working within the legislative framework and also having the ability to be innovative and meeting the choices and needs and preferences of applicants.'

## The impact of choice

Some participants talked about increased choice at the point of the allocation leading to longer-term sustainability, because ultimately people want to choose where they live:



**‘People who are in a really desperate situations still want to choose where they live.** It is difficult that people will get less choice (things which aren’t given priority or even credibility now under the new system). So we have moved backwards a bit here, but we can understand why that’s happening - it’s helping us discharge a duty. But remember that **this might have an impact longer term on sustainability...** people might want to move on quite quickly from the place they are allocated to (the reasons tenancies aren’t sustained are not just in terms of support and troubleshooting).’

## Local variation & the extent of choice

There is variation between local authorities in how much choice a household will be given. One participant noted:

‘Some local authorities are quite rigid on the number of areas that homeless households in particular can consider (or for a certain amount of time and after that you’re expanded out to other areas). This doesn’t feel right, and probably isn’t realistic in terms of people’s needs being met. **The interpretation of what’s reasonable in terms of choice is different from one area to another...it varies by local authority.**’

In some local authority areas, those owed a duty are given the same number of ‘area choices’ as others on the waiting list, such as the area in which this participant was speaking from:

‘We give people [X] area choices and we do it right up front, so we know straight away what people need and want. We’re mostly able to meet needs - there are only 2 instances in the last few years where people haven’t had their needs met. **We didn’t want to discriminate against homeless people - everyone applying to the list west to make [X] choices.** We know more about the individual right at the start - it’s about custom journey and customer choice.’

But in other areas, those owed a duty have their choices restricted. Some participants thought this doesn’t feel right:

**'[We] want to see people given choice even if they are homeless - it shouldn't be the case that someone isn't give choice just because they are homeless.**

People understand that some areas might be triggering, and they need their support networks. People need to feel in control of where their home is going to be. **Choice enables you to think of your house as a home, rather than as a stopgap.'**

But others talked about it not being practical to offer as much choice to homeless households, in order to be able to house them:

'[We] struggle with choice. [We] work in a needs-based system where supply is very limited. [We] allow people to make area choices. They can choose one area but not more specifically than that (i.e. they can't choose one street). But **in homeless priority, [we] push the boundaries on suitability of dischargers' duty.** When considering someone who's homeless, [we] look at public transport, [we] look at income/expenditure for getting kids to school every day etc. **So it's a 2 tier service... you don't get as good an offer because of the decisions [we] have the power to make...[we] take the choice away because legislatively [we] can.** And there is still variation - in some areas you can choose between a house and a flat, and in other areas you don't have the choice...choice is really important for sustainability but it blurs the lines. **The reasons [we] have an allocation policy is to ration resources because there isn't sufficient housing - if there was sufficient housing [we] wouldn't need an allocations policy. Choice is always going to be limited.'**

The system of local authorities making 'reasonable offers' to households in order to discharge their duty to house them was one which every participant understood as necessary, but also some felt could be problematic:

'What about choice?...[the] policy says that **if someone is given 2 reasonable offers then their duty will come to an end.** And [they] are quite strict about that....This is good in some ways. At least they know where they stand. But...**what's deemed as 'reasonable'?** **Do you strike someone off the list because they don't perceive the offer to be reasonable?** If you work with clients around the offer, you're more likely to sustain. If someone perceives their offer as reasonable, have they got more hope of settling in? **Forcing someone into a certain location or propriety isn't sustainable.** Especially when people have real needs. Those

tenancies will likely fail within the next 12 months. **In the numbers game it looks good on paper. But how many of those tenancies actually succeed for a 12 month period or more? Can we evaluate the reasons for bringing those tenancies to an end?** Was it ASB or something else? We need to closely analyse that. If we are pushing people into tenancies **we need look at the whole picture longitudinally.** It's creating voids and costing RSLs and ultimately costing the system more money that could be better placed elsewhere.'

Another participant talked about the pragmatism of taking choice into account in relation to stock type and availability:

'We allocate based on property type and size of property. But we have some tenants who are downsizing from a 3 bed, who say they want a 2 bed so family can stay, but according to the policy they should only get a 1 bed. Does that create a barrier for our current tenants in order to free up their 3 bed house? **You have to look holistically at it in order for the allocations to be sustainable.**'

Some colleagues reflected on the fact that offering people choice inevitably decreases the number of options of housing available to them, meaning it takes longer for them to be housed. For example, one participant said:

'Choice Based Lettings had an adverse effect in some ways. **Some people owed a homelessness duty were sat on the waiting list for ages because they were waiting for a certain house on a certain street.** Temporary accommodation was getting entirely full and there was no movement in the system.'

And another reflected:

'[The] **Areas of Choice policy has a significant impact on how quickly a client will be allocated accommodation.** Currently, we require homeless applicants to choose [X] high availability areas. Whilst this is positive in ensuring that individuals have appropriate choice, **it can often delay a household from moving on.**'

## Managing choice

When there is choice built in at the point of allocation, some participants reflected on the impact that can have on 'refusals':

‘Choice based lettings systems...have **high engagement levels with applicants, so refusal levels are relatively low.** Applicants have more choice in their property type and location, and can see the outcome of allocations for other applicants.’

Some of the reasons why a property might be ‘refused’ were listed during the course of this research, and included the following reasons (free-text data taken verbatim from an RSL’s database):

‘Looking at refusal reasons, it’s things like: area/location, waiting list not being up to date so they don’t get the response from the applicant, change of circumstances, housed elsewhere, property not ‘suitable’ (which can cover quite a lot). Reasons also include: MAPPA restrictions, want a lift, property too small, no garden, don’t want bad neighbours, not ready to move, want a ground floor property, too far away from family, noise from the road. **It’s clear that there are higher priorities for those applicants than just having a roof over their heads - place is really important.**’

However, some people indicated that the way the process of ‘choosing’ is managed can be problematic in a number of ways, and it’s not as simple as the applicant independently exercising their choices in a vacuum. Some participants felt the system can be manipulated:

‘...[The RSL] choose[s] who is eligible and who is not based on criteria that are shifting and not always explicable. **They seem to be ‘cherry picking’. They aren’t communicating or putting in place clear criteria.**’

Others felt that the customer may be told they can exercise choice, but they are actually being guided toward a particular property:

‘...**Choice is being taken away from people in a bid to move people on. People are being pushed to make a decision, and that pressurises clients.** Just because someone’s in social housing doesn’t mean they have less choice than the rest of us. We might say there is choice - but **is there really choice built into the processes at play?**’

In both of these examples, there was a sense that the individual or household needing to be housed was/were not in the ‘driving seat’. Another participant reflected:

'Clients don't really know what they need to know until it becomes apparent something has gone wrong. **People need a guide to navigate the system.** Can we have some kind of support that you can link an applicant into?'

And another stated:

**'The traditional waiting list format doesn't always enable applicants to make informed choices.** [We need] better data for applicants to clarify timescales for rehousing to encourage them to make decisions on housing type, tenure and location etc. Some priority banding schemes can cause confusion for applicants at different points of the advertising cycle (ie: position altering on shortlist).'

Ultimately, this comes down to control, and one participant reflected:

'Control at the moment lies with the local authority. **Very little control lies with the applicant** because you submit to a list and then you wait and when you're told the property is ready you're told where it is...if you don't like it you have 2 more strikes and then you're off the list. All the personal control has gone, and this isn't comfortable. **People's choice is being removed at every turn.**'

Finally, some participants talked about the fact that it may be necessary to restrict choice in the short-term in order to get through the current crisis, and then return to a more choice-based system in the longer term:

'Over time [we'd] like to move back to choice-based lettings, but the reality right now is that it's not possible. **[We] need...to get back on an even keel.**'

# RISKS OF ALLOCATING MORE HOUSING TO HOMELESS HOUSEHOLDS

When asked what the risks and/or negative impacts might be of allocating more housing to homeless households, three clear themes emerged across all the datasets:

1. Creating perverse incentives for people to present as 'homeless'
2. Building less cohesive communities
3. Disrupting the 'flow' through social housing

The all-Wales survey specifically asked participants: 'If allocations to homeless households or those at risk of homelessness increased what would be the main negative impacts?' Much of the rich narrative qualitative data presented below came from the responses to this question.

## Creating perverse incentives

24/45 responses to the all-Wales survey pointed to the fact that applicants and wider communities may come to see homelessness as the only way into social housing, thereby creating a perverse incentive for them (and perhaps also agencies advocating on their behalf) to present as such. One response particularly expanded extensively on this point:

**'The appetite to prevent homelessness within some residents will be diminished** as homelessness is a perceived "route in" to social housing. Even with an extended 6-month prevention window for statutory work to sync with RHW 2016 notices, this may see prevention work viewed negatively by some residents and see minimal engagement in positive prevention activities **making the job of the Homeless Prevention Team tougher. Some advocates and professionals may also see this as a route to settled accommodation for their clients.**

**...whilst contrived notices can be thought to be rare there are occasions where it's clear a landlord has given a notice at the request of a tenant who has the perception that homelessness is already the gateway to social housing.** Also, family members in many instances already think that kicking 18yr+ olds out of the family home is a sure fire way to secure a social housing property. We've seen an increase in people accessing emergency housing for only a short

period and then returning to family not through positive actions such as family mediation or conflict resolution, but because social housing has not been provided immediately. Whilst both scenarios are not standard, and instances are small in number, **there is a risk of increase and additional pressure on an already stretched system.**

... potential for applicants to progress their housing application chances through a homeless presentation on the merits of it being unreasonable for them to remain in their current housing. **Additional homeless case management capacity and actions required when statutory services can only be funded through core funding and those budgets are incredibly stretched** would be a significant challenge. **Also potentially this dilutes the strength of the homeless legislation which is supposed to be the safety net in the most extreme circumstances.'**

This concern also arose as part of the discussions in focus groups and meetings, but it most extensively presented in the anonymous survey results.

## **Building less cohesive communities**

25/45 responses to the all-Wales survey talked about the risk of creating imbalanced communities, or communities where there is not the desired level of cohesion. In many of these responses, there was a focus on increased instances of anti-social behaviour, tenant arrears, and breakdown in sustainability of tenancies, all creating more work for the agencies involved, and detracting from the ability to house more people in a long-term sustainable manner and spend time on prevention and strategic planning. For example:

'If we are talking of a population of people who have higher support needs then we **risk damaging community balance**, resulting in people not thriving in these areas. At the very least homelessness itself is traumatic and we will run the risk of creating social housing communities with high levels of trauma.'

And:

‘If those being allocated also had high risk and or complex needs the negative impact would be on sustaining and creating cohesive communities and may require **more intensive housing support.**’

## Disrupting the ‘flow’ through social housing

2/45 free-text responses to the all-Wales survey question on the risk of housing more homeless households picked up on the importance of ‘flow’ through the system of social housing. This was a theme that came through repeatedly in the focus groups and 1:1 participant meetings. One of the all-Wales survey respondents articulates this well:

‘High numbers of lets to homeless households also leads to a **disruption in the flow of lets on the waiting list.** Since homeless lets do not provide a property in return (unlike lets to those who are downsizing or transferring to a larger property). It has been shown that letting properties to those who need to downsize can result in a chain of lets that can resolve the housing need for a number of households. **Letting to a homeless family does not free up a permanent let and letting high percentage to homeless households can result in a significant drop in properties becoming available to let.**’

Another responses echoes this, saying:

‘Reduce[d] tenant mobility within stock and the ability to house other applicants within our communities in housing need. **Reduction of tenant mobility reduces availability of properties - need to ensure throughput** of tenants from larger family sized accommodation.’



# BENEFITS OF ALLOCATING MORE HOUSING TO HOMELESS HOUSEHOLDS

Participants were also asked what the benefits would be of allocating more housing to homeless households. In the all-Wales survey, this was framed in terms of ‘positive impacts’ in Question 11: ‘If allocations to homeless households or those at risk of homelessness increased what would be the main positive impacts?’

Overwhelmingly, the survey responses pointed to the likely positive impact on reduced stays in temporary accommodation. 28/45 responses said that reliance on temporary accommodation would decrease, and many went on to mention the impacts that such a reduction would have on stretched budgets, which could then be utilised for other areas of housing work. For example:

**‘Short term reduction in B&B usage and resultant positive impact on General Fund budget.** Reduced use of temporary accommodation and number of LA properties used as TA – 1 in 3 currently used for this purpose. **Reduced void expenditure for LA** as homeless clients will not have to move on from LA temporary accommodation provided in it’s own stock and in doing so reduce the need for subsequent works to get properties ready for re-letting.’

Another response states:

‘Reduction in the need for temporary accommodation. **Ability to re direct these funds to more effective homeless prevention measures.**’

Many responses cited improved health and wellbeing for the homeless individuals and families involved:

‘Prevention of people moving to temporary homes. **Family separation being avoided. Less stress and strain on applicants. People having permanent housing earlier with all its associated benefits. Help alleviate health issues and other related social impacts** (for example children accessing education or reduction in offending). Income maximisation and access to support to help with unemployment.’

Some responses linked this individualised positive impact to a potential impact on wider support services, including budget pressures:

‘Positive impact on homeless client wellbeing through reducing time spent in emergency/temporary accommodation and **resultant reduced demand of more costly subsequent support interventions from other Council & Statutory Services.**’

Another states:

‘This would obviously decrease pressures on homelessness and temporary accommodation however dealing with these issues would have **a range of social benefits for a range of services from health to education.**’

Yet another response on this point says:

‘The obvious impact would be for the homeless applicants themselves. Enabling them to have the **safety and security of a home and providing the foundation for a future with improved prospects in respect of health, wellbeing, education, employment opportunities** etc. A **decrease in costs to services** such as health, social care, policing and third sector organisations which can all bear the cost of homelessness for different reasons.’

One response linked the pressures of sourcing temporary accommodation with the wider ecosystem of social housing, and suggested:

‘This would ideally reduce the average length of stay in temporary accommodation which we know can have significant negative impacts on households **The high number of households who become homeless are temporarily housed in a wide variety of accommodation but some of this is social and PRS stock which ultimately reduces the amount of homes available for permanent homes.** Our target should be to find a permanent home for anyone threatened with homelessness before it occurs or with the shortest possible stay in temporary accommodation.’

## SUGGESTED AREAS FOR FURTHER RESEARCH

Throughout this work, some areas seemed to suggest themselves for further research, and are therefore noted below.

### **Longitudinal work on sustainability**

A couple of the participants in spotlight areas particularly advocated for some longitudinal research on the outcomes for tenants who have been rapidly re-housed. This request emerged from discussions around sustainability, and the fact that some housing professionals working in the system currently in Wales are concerned that there is not sufficient support and infrastructure to sustain tenancies into the longer term for those with complex needs. Participants suggested that it's not possible to have a full and accurate picture of the long-term outcomes of rapid re-housing (both in terms of cost and benefit, financially and socially) without gathering this kind of data, systematically, from the outset.

### **Correlation between demand/supply ratio and allocation rates**

One of the key barriers emerging from this work was the dearth of 1 bedroom general needs properties, proportionate to the levels of 1 bed need on local authorities' waiting lists. It may be fruitful to do some further quantitative research on this particular factor, to see if there is a correlation between localised disparity of 1 bed stock supply and demand and any differences in the rates of allocation to homeless households. It is unclear the extent to which the lack of 1 bedroom properties impacts on the inability to house more homeless households. However, participants suggest it is a key factor, so further targeted work on understanding the scale of the problem may inform solutions which could have a significant impact.

### **More detailed consideration of data from the spotlight areas**

Further research into each of the spotlight areas could fruitfully and quickly build on the research presented in this report. Areas for consideration might include a very detailed dive into:

- The figures contributing to their reported allocation rates, looking at exactly how they 'pull' the data from their systems, how they categorise applicants owed a duty and contribute those into the data count;
- Intensive scrutiny of their local policies around elements of the allocation process (such as how they deal with former tenant arrears, history of antisocial behaviour,

and support needs relating to substance misuse), all of which contribute to who is allocated a property and who is not;

- Detailed mapping of the 'allocation journey' from the point of a property becoming available, to the point of a household taking up residence.

Correlation of the outputs from these areas of exploration might be set against the localised rates of allocation to homeless households, and start to indicate more specifically which approaches have the greatest impact on achieving higher rates. This could, of course, be performed across all 22 local authorities in Wales, but this would increase the size of the work and therefore the time needed to undertake it. Having progressed to a deeper understanding of the spotlight areas already, through this current research, a good foundation has been laid to dig deeper in those areas in particular.

## CONCLUSION

Allocations processes are a means of rationing the finite resource of social housing in a way which is as fair and consistent as possible whilst also allowing enough flexibility to account for significant variation in individual circumstances. This research has allowed for some exploration of the challenges inherent in operating allocations processes 'on the ground' in Wales, in a climate where demand for social housing is increasingly outstripping supply.

Many people involved spoke about the fact that nuanced individualised allocations are essential, and that processes must take a household's needs, wants, and preferences into account. Most people feel that offering real choice, no matter someone's current 'status' in relation to homelessness, and no matter their history, is the most likely way to create successful long-term tenancies and settled and cohesive communities. But the vast majority of participants also talked about the significant challenges in relation to the supply of social housing stock in Wales. In the context of this limited supply, many people called into question the extent to which offering 'choice' is currently possible.

It was evident throughout conducting this piece of work that there is a real willingness to find collectively owned solutions to the current housing crisis. However, many people expressed feelings of helplessness in the face of a system under such intense pressure, with limited visible routes to increase supply or reduce demand.

Any changes to allocations practices will need to be accompanied by interventions aimed at increasing supply or stemming demand. Many people shared the view that allocating more social housing to those owed a duty, without considering the impact on others who are in need, or without considering the wider ecosystem of how housing operates, may have detrimental impacts.

Local authorities and RSLs across Wales are all allocating social housing in different ways, and there appears to be huge variation in the rates of allocation to homeless households, based on the current available data. Because local practices differ so extensively, and each area has such a different set of opportunities and challenges (demographically, geographically, politically, and operationally), it's not possible to identify which elements of local allocations processes are particularly successful in increasing allocation to homeless households. The areas outlined in this report for further research suggest how we might get closer to some answers on this question.

However, there is clearly some good practice happening right across Wales, with colleagues working together to find new ways to address this complex problem. The spotlight on Carmarthenshire shows radical change within the space of a year, in which political support at a local level has enabled local authority officers and their RSL partners to work with the people on their waiting lists to proactively find new solutions. In Cardiff, the flexible approach across all partners, to increasing and decreasing allocations to homeless households in response to need, seems to be assisting them in achieving sometimes 100% rates of allocation to homeless households. At the all-Wales event where key findings from this research were presented, colleagues from across the sector shared their own areas of good and emerging practice, and came with a real appetite to work together towards improvements.

Throughout the research, participants presented ideas for how legislation and guidance might contribute as a part of the solution. They reflected on the fact that addressing the current crisis will likely demand some short-term interventions, but we must also stay focused on whether those are the right solutions for the longer term. People often returned to the need for clarity of purpose around the long-term strategic direction for social housing in Wales, and the need to design the system of allocations with that long-term vision in mind.

At the heart of any solutions, it will be essential to have a clear answer to the question: 'Who is social housing in Wales for?' If there is only enough social housing for a certain proportion of those presenting into the system, and the demand from homeless households is increasing to the point where it outstrips supply, then allocations processes which mandate the prioritisation of homeless households over all others will create a system in which social housing is provided only to households who are owed a duty. Participants warned against this, suggesting that it will drive perverse incentives into the system for people to present as homeless in order to be housed, and that there may be wider negative impacts on community cohesion and the natural 'flow' through social housing stock.

Those who participated in this work were keen to find innovative and collaborative ways to improve the status quo. There are strong partnerships on which to build, and a significant depth of expertise, as well as a willingness to change and learn from others. The overriding 'ask' is for clarity around the long-term vision for who social housing in Wales is for, an aligned set of planned responses which build clearly towards that vision, and sufficient time

and investment to be able to meaningfully collaborate around achieving those huge leaps forward.

# APPENDIX 1: COMPENDIUM OF 5 SPOTLIGHT PIECES

## Neath Port Talbot Spotlight

### Key facts

- The Council is non-stockholding since 2011, and operates a shared allocations policy with its stock-transfer RSL, Tai Tarian. A Nominations Agreement is in place with the other RSLs operating in the area.
- RSLs operating in the area: Tai Tarian, Coastal, Linc Cymru, Caredig, Pobl, Aelwyd, First Choice
- Tai Tarian holds 9053 units of stock
- Total social housing stock in the local authority area: 12,836 units
- Total allocations by Tai Tarian in 2021/22: 531. Of which 216 were made to homeless households (41%)<sup>5</sup>
- 200 households in temporary accommodation (TA) as at 13 April 2023. Average length of stay in TA during 2022/23 = 88 days

### Headline

Neath Port Talbot is a non-stockholding authority, since it transferred all stock to Tai Tarian in 2011. The shared allocations policy, developed at that time and still in place now, is subject to 3 yearly reviews in partnership between Tai Tarian and Neath Port Talbot County Borough Council. The policy is banding-based (Urgent, Gold, Silver and Bronze bands). There is no common housing register, although conversations around developing one have taken place recently in the context of the Rapid Re-Housing strategy. At present, there seems to be limited appetite to progress a common register, and the strategy may instead pursue a common applications process in the first instance, with a view to progressing towards a common register in the longer term.

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<sup>5</sup> Because there is no common housing register, and the local authority is non-stockholding, there is no overarching figure available to indicate the total number of allocations made in Neath Port Talbot during 2021/22 (and of those, how many were made to homeless households).



## Deep Dive

Neath Port Talbot's Housing Options team have seen a large increase in presentations to the service over recent years, with homeless presentations rising from 2079 in 2020/21 to 2650 in 2022/23.

Applicant and tenant support needs across Neath Port Talbot are reportedly high, and the partners gathered together in this research indicated that complexity of need is increasing. The economic situation is having a significant impact on people, and with the rising cost of properties and PRS landlords exiting the sector, tenants are tending to stay in their social housing let, thereby decreasing the 'churn' of properties becoming available for allocation.

Finding the balance between creating a sustainable tenancy, and managing a successful allocation, can be hard. Some RSLs indicate that applicants going through the local authority's 'move-on panel' struggle with the process and paperwork, and the criteria put in place by the panel (including stipulations around recent substance misuse) can be a barrier to people moving into a property. Other RSLs indicate that they may have a void property, but the referrals and nominations they receive could be for applicants with much more significant mental health needs than they (the RSL) have the expertise to support with.

Among this complexity and high need, the allocations system in Neath Port Talbot is quite fragmented, with no single 'route in' for applicants looking for social housing. The main stockholding RSL (Tai Tarian) operates a choice-based lettings process under a shared allocations policy with the local authority, and the other 6 RSLs in the borough operate under a nominations agreement. Nominations have stood at around 50%, until recently when RSLs one by one have started to increase their nominations levels (with one RSL coming up to 100%).

As in many areas across Wales, there is a high demand in Neath Port Talbot for 1 bedroom properties, and a very limited supply, particularly in areas where applicants would prefer to live. The void rate for Tai Tarian (the majority stockholder) is around 500-600 per year, with larger properties more likely to incur a void.

Some of the RSLs operating across multiple boroughs indicated that they find the lack of a common housing register in Neath Port Talbot to be inefficient and confusing for applicants. It also creates a vacuum in which meaningful partnership could thrive if there were a common register to coalesce around.

Despite this, some RSLs urged caution around the introduction of a common register, suggesting that flexibility and discretion around the management of allocations must be retained in order to allow for long-term sustainable tenancies and cohesive communities. RSLs were clear to state that this is not a 'numbers game' - choice, preference, and a deep understanding of applicant and tenant needs, is essential if people are to be housed effectively.

Partnerships mostly seem strong and positive in the area, and partners say they come together around important strategic conversations as well as matters of operational urgency. There are also some direct links being made between the RSLs operating in the area, on specific issues such as supporting applicants who are victims and survivors of domestic violence, or arranging the letting of adapted properties.

During the course of the research, RSLs commented on how positive and fruitful it was to be gathered together discussing allocations, and some solutions started to evolve even during the short time we spent together in a facilitated conversation. There is an overall sense among partners that more of this would be welcomed.

## Cardiff Spotlight

### Key facts

- The Council operates a common housing register, with 8 RSLs participating
- RSLs operating in the area: Cadwyn, Cardiff Community, Hafod, Linc Cymru, Newydd, Taff, United Welsh, Wales & West, Aelwyd (not a part of the common register)
- Local authority is stockholding (13,629 units)
- Total social housing stock in the local authority area: 25,742 units
- Total allocations in 2021/22: 1001. Of which 601 were made to homeless households (60%)
- 1584 households in temporary accommodation (TA) currently. Average length of stay in TA (for households under a duty) = 262 days

## Headline

Cardiff's flexible quota approach to its segmented waiting list, operated through the common housing register with its 8 RSL partners, means that lettings to homeless households can reach 100% at certain times. With over 25,000 units of housing stock, the biggest privately rented sector both in percentage and absolute terms, and a large student population, Cardiff has some differences which set it apart from other parts of Wales.

## Deep Dive

Social housing in Cardiff is allocated via a common housing register, operated by the Council, with 8 RSLs participating. The Council operates a banding scheme, ensuring that people with the greatest housing need are given additional priority in order to be housed first.

Applicants joining the waiting list select which areas they wish to live in (for homeless applicants, a minimum of 4 areas need to be selected in 'high availability' areas). The waiting list is split into 4 sub-groups:

- Immediate
- Homeless
- Beneficial
- General

Targets are applied to inform what percentage of lets is available to each sub-group. In response to housing demand, a flexible quota is operated towards lets to priority needs groups (such as homeless applicants). In response to recent demand, this has meant lets to homeless households increasing from 60% in 2021 to as much as 100% for certain periods of time. The let quota currently operates at around 80%, with lets prioritised from family temporary accommodation providers in addition to other housing needs.

Cardiff has the highest proportion of privately rented accommodation in Wales in both percentage terms (>20%) and absolute numbers (the large student population may account for this to some extent). This means that disruption in the privately rented sector has more potential to interrupt Cardiff's housing supply. Non-fault Notices to Quit were up by almost 100% last year, and there is an average shortfall across all PRS property types of around £400.

Total social housing stock in Cardiff comes in at 25,742 units, with a good mix of property sizes across this portfolio, with the highest proportion of stock being 2 bed properties.

Despite the high levels of social housing stock, Cardiff currently has a waiting list of 7791 households, with 679 on the 'Homeless' waiting list, and 87 with an 'Immediate' priority.

For homeless households, the Council operates 3 homeless accommodation gateways (one for single people, one for families, and one for young people). In 2021/22, the Council placed a total of 2033 households into these 3 gateways, and the number of homeless presentations since that time has risen steeply.

Due to a lack of move-on options, the average journey length across all gateways has now increased, and at the present time all gateways are close to being fully occupied. Demand on temporary accommodation has therefore risen rapidly, leading to increased use of hotels as interim accommodation.

Partnership working between the local authority officers and their RSL colleagues is strong and fruitful, with the common housing register seemingly working well as a vehicle for coherent lettings. There is a challenge with the local authority being large and therefore having many different departments, which some RSLs struggle to navigate within short timeframes. And some partners indicate that the data system underpinning the processes needs to be updated, and more data shared, to make for more efficient day-to-day working.

But there is a general feeling that the segmentation of the register makes for effective allocations, freeing up accommodation and prioritising those most in need. The relationships built around the register and the system are the key to success, with multiple partners coming together to adapt their approaches very quickly in response to demand, and everyone having an overview. Organisations meet to discuss exclusions or MAPPA cases, which RSLs say doesn't happen in every area of Wales. Colleagues operating in Cardiff say they talk to each other, and put in place fair and transparent processes, looking to find solutions to difficult problems.

# Carmarthenshire Spotlight

## Key facts

- Current policy: Direct Matching based on need
- RSLs operating in the area: Caredig, Pobl, Wales & West, Bro Myrddin
- Local authority is stockholding (9267 units)
- Total social housing stock in the local authority area: 12,487 units
- Total allocations in 2021/22: 68.74 per 1000 units of stock. Of which 33.32 (per 1000 units of stock) were made to homeless households (48%).
- 257 households in temporary accommodation (TA) as at end March 2023.  
Average length of stay in TA = 14 weeks

## Headline

The local authority has made a significant shift in allocations policy during 2022/23. Moving from a choice-based lettings system, direct matching is now in place, and outcomes are being monitored.

## Deep Dive

The allocations process in Carmarthenshire has been through significant change in the past year. Proactive, targeted action has been taken to amend the allocations policy to prioritise people in housing need, which makes better use of social housing stock.

Up until late 2022, the local authority was operating a choice-based lettings system ('Canfod Cartref'), with the waiting list sorted into categories of: 'Band A', 'Band B' and 'Registered Only', based on urgency of circumstances and type of housing need.

Given the limited supply of housing stock available (typically only 900 properties available for allocation per year), all eligible applicants were able to bid for properties and priority was given to Band A households. However, where Band A applicants did not bid, those homes would be allocated to either Band B or 'registered only' households. The bidding system caused confusion for many applicants, and with hundreds of bids being placed to most available properties, the reality of those in other bands being housed was low, and decreasing.

During 2022, with the supply of housing outstripped by demand at a rate of 5:1, local authority officers undertook a full review, which showed:

- 4337 households on the housing register, the largest proportion of whom (60%) were in no housing need;
- 327 households on the waiting list owed a full duty (a rise of 9% since the previous year);
- Projection of more than 2000 people presenting as homeless by the end of the year (more than 20% higher than pre-pandemic levels);
- Significant demand for 1 bedroom homes (68% of people owed a section 75 duty need a 1 bed property);
- Lack of TA to meet rising demand (average length of stay in TA =18 weeks);
- Unprecedented levels of section 21 notices being issued, with landlords issuing 50 per month (up from a pre-April 2022 level of 1-2 notices per month).

Analysis cited additional pressure coming from immigration and asylum policy including:

- Ukraine Resettlement (a total of 92 households (257 individuals) arriving into the area as at August 2022 through both the Homes for Ukraine and Super Sponsor Scheme routes);
- Notice from the Home Office of a further 141 asylum seekers due to enter the area through the Dispersal Scheme;
- Additional households seeking housing due to the Welsh Government's 'no-one left out' approach to those with no NRPF.

Officers recommended an exceptional and urgent response: development of an emergency interim Social Housing Allocations Policy. Whilst the policy was being put in place (October 2022 - April 2023) discretion was given to the Head of Housing and Public Protection to directly allocate the majority of properties to meet the most urgent and acute levels of need.

Proposals for the new Allocations Policy indicated a move away from choice-based lettings to direct matching:

- Homes matched to people in the greatest need first. Homes only advertised on Canfod Cartref if they could not be matched;
- Applicants owed a Housing Duty given a reasonable offer; all other applicants given 2 Suitable Offers.

The initial proposals for change sought to go further, but legislation disallowed the closing of the housing register to those with no discernible need and/or the ability to financially meet their own housing needs.

The changes were accompanied by significant work on a public awareness campaign, engagement of local members, and partnership with the RSLs operating in the area.

Carmarthenshire's Head of Housing and Public Protection and the Housing Hwb team have clearly indicated that full local political support was essential to achieve this significant shift in policy and practice. Without this, the extent of proactive change would not have been possible.

The RSLs who have been most closely engaged so far report dramatic changes, and say the focus on the new policy has increased partnership working. Twice-weekly meetings, focusing on the applicants going through the system, have positively built relationships. Some RSLs have already increased the nominations of their stock to the local authority, with one RSL now nominating at 100%. Trust has been built, and people are 'getting round the table' to enact change. Local authority colleagues are keen to get all RSLs involved, working together to really understand every single person on the list, their needs and circumstances, so they can prioritise those most in need.

It was clear in the discussions with those operating in Carmarthenshire that there is respectful and focused partnership at play. Everyone has a different perspective, and it can be hard to find the middle ground, but the ability to 'see things from other people's point of view' is key to the process.

The Emergency Social Housing Allocations Policy went live on 5th April 2023. Quarterly data returns from the intervening system, operated by the Head of Housing and Public Protection, already show an increase in direct matches, and a decrease in the length of time people are waiting to be matched after being placed into a particular band (down from 20 weeks in the first quarter's data to 16 weeks in the 2nd quarter).

# Wrexham Spotlight

## Key facts

- The Council does not participate in a common housing register. A nominations agreement is in place, and is currently being reviewed and revised.
- RSLs operating in the area: Adra, Clwyd Alyn, First Choice Housing, Grwp Cynefin, North Wales Housing, Wales & West Housing.
- Local authority is stockholding (11,065 units)
- Total social housing stock in the local authority area: 13,611
- Total allocations in 2021/22: 865. Of which 237 were made to households owed a homelessness duty by the council (27%)
- 278 households in temporary accommodation (TA) as at end March 2023.  
Average length of stay in TA = 22 weeks

## Headline

Wrexham operate a banding-based system in a nomination agreement with the 6 RSLs in the area, which is currently being reviewed. As a Home Office dispersal area, bordering with England, and experiencing the impact on new-build development brought about by recent phosphate control regulations, the borough has some very specific pressures on social housing. As in many areas, demand is significantly outstripping supply, particularly for 1 bedroom properties.

## Deep Dive

The local authority in Wrexham currently holds a homelessness caseload of over 800, and at this time there are around 260 households in temporary accommodation, with very limited move-on options.

Council-owned social housing stock totals 11,065 properties, with a further 2546 affordable units owned by the 6 RSLs operating in the area. The large majority of these are 'general needs' properties, with a smaller proportion of sheltered housing, supported living for people with learning disabilities and veterans of the armed forces.



However, despite the levels of stock being comparatively high in a Wales-wide context, there is very limited turnover at present. The availability of 1-bedroom properties is particularly challenging. Figures show us that that demand for 1-bed properties is outstripping supply by 20:1 at this time (during 2022/23, only 124 1-bed properties became available; the total number of households on the waiting list at the start of the year was 4325, and the data shows that around 58% of applicants to the register have a 1-bed need).

The allocations system in Wrexham operates in such a way that households work their way up the list, within the band they have been placed in. Whilst on the waiting list, each household with a homeless duty has a Housing Options Officer who contacts them weekly to stay connected with them and review their circumstances. When a property becomes available which might be suitable for them, the local authority will contact them directly to talk to them about whether the property will suit.

A number of factors influence the decision to match a particular property to a particular household; for Wrexham County Borough, local community connection is still a very important consideration.

There are 3 specific local lettings policies in place between the Council and RSLs active in Wrexham at the present time. One of these relates to a rural community and gives very high priority to households living in the immediate vicinity; the other two are based on stipulations requiring applicants to have no history of substance misuse, alcohol misuse, or risk of vulnerability within the past 2 years.

Currently, homeless households are not prioritised into Band 1. Homeless households are placed in Band 2 of the waiting list, which operates in date-order, therefore the household will join the bottom of the list within Band 2 at the point they officially become homeless.

The allocations, housing options, and local lettings agency teams within the local authority have been brought together over the past year, and are now co-located and sharing the same public-facing reception. This has had a real impact, as when someone presents as homeless they are now automatically open to all of those teams for support.

With the changes brought about by the pandemic, and the subsequent economic pressures, the local authority is now in the process of reviewing its nomination agreement. A

number of RSLs currently have individual arrangements in place with the Council, which need to be considered in the context of the local authority's housing strategy. Rapid Re-housing has not yet been adopted by the Council.

Partnership meetings with RSLs were working well before the pandemic, and re-kindling these effective partnerships will now be a key part of the local authority's plan, building on its restructured team.

## SARTH Partnership Spotlight

### Key facts

- Conwy, Denbighshire and Flintshire operate the Single Access Route To Housing (SARTH), a partnership allocations policy, which includes all RSLs operating across the 3 local authority areas. Following large scale voluntary transfer (LSFVT) in 2008, Cartrefi Conwy manage what was Conwy council housing. Council housing is retained in Denbighshire and Flintshire.
- RSLs operating across SARTH: Wales & West, Clwyd Alyn, North Wales Housing, Grwp Cynefin, Adra, Cartrefi Conwy
- Total social housing stock in each local authority area:
  - \* Conwy: 6107 units
  - \* Denbighshire: 5358 units
  - \* Flintshire: 9919 units
- Total allocations in 2021/22:
  - \* Conwy: 264. Of which 113 -were made to homeless households (43%)
  - \* Denbighshire: 364 Of which 91 were made to homeless households (25%)
  - \* Flintshire: 23% of lets were made to homeless households<sup>6</sup>.
- Households in all forms of temporary accommodation (TA) as at end of March 2023:
  - \* Conwy: 319
  - \* Denbighshire: 189
  - \* Flintshire: 169
- Average length of stay in TA:

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<sup>6</sup> The contributory data for this percentage figure is available on request from colleagues at Flintshire local authority, as it could not be provided in time to appear in this report.

- \* Conwy: 114 days
- \* Denbighshire: 65 days
- \* Flintshire: 130 days

## Headline

The SARTH partnership has been in place since April 2015, with changes to the allocations policy made via the SARTH Steering Group, which comprises membership from all partners. Each local authority operates a distinct common housing register (although Denbighshire and Flintshire shared the administration of their registers between 2017 and April 2023). Allocations are based on a banding system (Bands 1-4), with homeless households generally placed into Band 2 (with local connection), unless the application involves domestic abuse/domestic violence (in which case, the applicant enters into Band 1 when full homeless duties are accepted) or there is no local connection (the applicant enters into Band 4). Within each band, priority is given in date order. SARTH partners have been operating a 50% direct lets process to homeless households since 2020, and this persists into 2023, with a decision to be made soon on future levels.

## Deep Dive

The drive across the SARTH partnership to create a coherent system for applicants, and find joint solutions to complex problems, is a huge strength. Whilst all partners have different roles to fulfil, the ability to coalesce around a centralised partnership policy supports relationship-building, and there is continued enthusiasm and commitment from partners for this approach. Participants in this spotlight research talked about the will, drive, and passion from the people involved.

In addition to the SARTH Steering Group, an operational group meets regularly and finds practical ways to work together, bringing in expertise where necessary, including the recent addition of a colleague from mental health services. With the introduction of the homeless Direct Let Policy during the pandemic (with 50% lets now being made available for direct matching to homeless households), the operational group meets very regularly (at one point, weekly), discussing specific delays for individual applications, supporting each other to speed up the process, and sharing as much information as possible. This approach to operational transparency is clearly very positive, surfacing issues such as banding decision appeals, and highlighting areas for jointly improving practice.

However, participants in this research were also clear that whilst the partnership has significant positive outputs, it does not mean that allocations are made in exactly the same way in each local authority area. Despite the use of a common policy over many years, there is still significant variation in allocation rates to homeless households, as well as other differences in practice. The complex day-to-day operation of allocating social housing (taking into account available stock, choice and preference and needs of applicants, and the drive to build sustainable communities into the longer term) is coupled with local geographical, demographic, political and cultural differences, which all lead to variation.

Across all 3 areas, there are significant pressures on social housing on the Northern coastal strip, and they have limited 1 bedroom stock (particularly for people under the age of 55) and housing for larger families (4+ beds). The allocations policy allows applicants a choice of area when they enter onto the register, but the pressures of discharging the duty to homeless households, coupled with the limitations of stock availability in certain geographical areas, means that choice is realistically very limited as the more robust consideration of 'suitability' under the Housing Wales Act 2014 is applied.

The partnership is having extensive discussion at present about choice for applicants, and the holistic nature of making an allocation in order for it to sustain into the longer term. This discussion recognises that the knock-on impact of letting housing that doesn't meet people's personal preferences and nuanced individual needs, means that sustainability can be compromised.

The reality of finite housing stock and the rising numbers of homeless presentations means that pressure on temporary accommodation across SARTH is high, with a total of 812 households in temporary accommodation at the end of March 2023. Applications to social housing have grown in recent years and the impact of the economic crisis is evident, both in this rise and in the support needs that households are presenting with. In the context of the dearth of suitable housing stock, this increased demand for housing and associated support is bubbling up with no obvious way for the pressure to be released. There is a significant disconnect between housing applicants, homeless profile and local supply. When focusing specifically on the homeless cohort in Flintshire, 84% of those households who were homeless and accommodated by the Council have a 1 bed need. The majority are under 55 years of age, so need general needs housing, but only a tiny percentage (less than 7%) of the available stock locally fits that brief.

There is a shared concern across the SARTH partners who engaged in this research, that the drive to house those officially classed as 'homeless' (in the technical terms of the local authorities' duties) will skew resources away from others in need, who are perhaps in overcrowded or otherwise precarious accommodation, and may become 'homeless' at any moment. Losing focus on this wider picture, in order to meet short-term aims of housing those owed a duty, would be to the longer-term detriment of an effective social housing system.

The risk to all partners involved in this pressurised environment is very high, with a saturated temporary accommodation portfolio where housing is not optimal for its residents, limited move-on opportunities into a long-term let, and high support needs for housing provider partners to manage once an allocation has taken place. The partners share a concern that increasing the prioritisation of homeless households over those with other needs, without interventions which meaningfully increase the provision of suitable stock and address tenant support needs, will simply create greater unmanageable pressure.

## APPENDIX 2: ALL-WALES ANONYMISED SURVEY QUESTIONS

1. What is your organisation?
2. Does your organisation belong to or operate a Common Allocations Policy?
3. Does your organisation belong to or operate a Common Housing Register?
4. If you are a housing association, what level of nomination agreements do you operate with your local authority?
5. What do you think works well about the current approach to allocations in your local area?
6. What do you think could be improved within the current approach?
7. Which kind of household/individual do you allocate housing to most frequently?
8. What is the most important driver in determining who you allocate housing to? E.g. availability of housing stock, addressing homelessness, alleviating broader housing need, nominations.
9. What are the main barriers to the allocation of housing to those who are homeless or at risk of becoming homeless?
10. Thinking about the legislative and policy framework, what changes would help the approach to allocations to homeless households?
11. If allocations to homeless households or those at risk of homelessness increased what would be the main positive impacts?
12. If allocations to homeless households or those at risk of homelessness increased what would be the main negative impacts?
13. Do you have anything further to add?

## APPENDIX 3: SPOTLIGHT AREA ADDITIONAL DATA SUBMISSION REQUEST QUESTIONS

1. Your approach to allocations in your area (for example any partnership arrangements, common housing register or allocations framework, bandings, agreements and targets).
2. A summary of the operating environment in your area. For example; overall population, stock availability/type, rates of homelessness, whether you currently hold a waiting list. If possible, this summary should also highlight the scale and characteristics of the population being supported in emergency temporary accommodation.
3. In areas where a Common Housing Register exists the following data over the 21/22 financial year will be required:
  - 3.1. Any relevant nomination agreements or shared approach under a common allocations policy
  - 3.2. Number of GN lettings made to homeless households from the common housing register per thousand units of stock (if unavailable, how many lettings from the top band)
  - 3.3. Number of General Needs lettings in this area, not from the common housing register per thousand units of stock.
  - 3.4. Number of nominations refused or not made and reasons.
4. Where no common housing register exists, the following data over the 21/22 financial year will be required:
  - 4.1. Any relevant nomination agreements or shared approach under a common allocations policy
  - 4.2. Number of General Needs lettings.
  - 4.3. Number of General Needs lettings made to homeless households
  - 4.4. Number of General Needs lettings not to homeless households. Details of the basis on which these lettings were made.
  - 4.5. Number of General Needs lettings in this area.
  - 4.6. Number of nominations refused or not made and reasons.

5. You will also be invited to a virtual focus group in April for providers in your area to explore the following:
  - 5.1. The barriers to allocating properties to homeless households.
  - 5.2. Ideas for change to funding, policy, legislation and guidance that would support higher levels of allocations to homeless households.
  - 5.3. Unintended consequences, risks and opportunities of change to current legislation and policy.



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