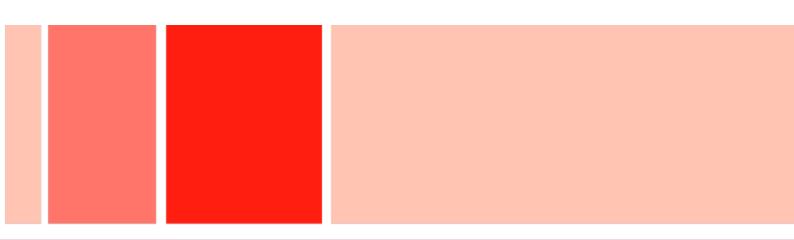




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Exploring the allocation of social housing in Wales



Mae'r ddogfen yma hefyd ar gael yn Gymraeg.

This document is also available in Welsh.

Exploring the allocation of social housing in Wales

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Views expressed in this report are those of the researcher and not necessarily those of the Welsh Government

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Acronyms

ASB: Anti-social behaviour

CHC: Community Housing Cymru **CHR**: Common Housing Register

GP: General practitioner

LDP: Local Development Plan **LHA**: Local Housing Allowance

LHMA: Local Housing Market Assessment

OT: Occupational Therapist

RSL: Registered Social Landlord

SARTH: Single Access Route to Housing

TA: Temporary accommodation

TACP: Transitional Accommodation Capital Funding Programme

VAWDASV: Violence against Women, Domestic Abuse and Sexual Violence

Glossary

Allocation

Selecting, offering and placing a household from the housing register into social housing either through the local authority or through a registered social landlord or housing association

Allocation rate per 1000 units

Number of households allocated to social housing for every 1000 units of housing stock over an estimated one-year period.

Applicant

The individual who has registered for social housing, potentially representing a larger household.

Housing First

'Housing First' is a recovery-oriented approach to ending homelessness that centres on quickly moving people experiencing homelessness into independent and permanent housing and then providing additional support and services as needed.

Housing Register or Common Housing Register (CHR)

A housing register is a list of all individuals who have applied for social housing, and key information about the individual.

A CHR is a list of individuals who have applied for social housing shared between one or more local authorities and RSLs, a common function of which is enabling people seeking social housing to make a single application for all housing in one area.

Nomination

When an individual – or shortlist of individuals – on a housing register is proposed by a local authority to be considered for a social housing allocation.

Nomination Agreement

An agreement between a local authority and a housing association where a target number of nominations is set.

Offer

When an individual or household is given the opportunity to accept or reject a social housing allocation.

Preferential banding system

This is a mechanism of an allocation scheme or framework to assess the needs of an applicant in order to prioritise the allocation of social housing, with households in the most urgent need being placed into priority or preferential bands. Banding systems operate in many parts of Wales – however, there is no standardisation and many areas have different requirements for each band, a different number of bands and different names or labels for the bands.

Rapid Rehousing

Rapid Rehousing is an internationally recognised approach which ensures that anyone experiencing homelessness can move into a suitable settled home as quickly as possible, rather than staying in temporary accommodation for long periods of time.

Registered Social Landlord

Registered social landlord (RSL) is the technical name for housing associations that are registered with the Welsh Government and are regulated to maintain a good standard of management.

Relationship Managers

Welsh Government civil servants who act to enhance the relationship between the Welsh Government, local authorities, and stakeholders by providing support and guidance to assist them in the development of their homelessness strategies and policies, whilst gaining an understanding of operational issues to inform Welsh Government policy development.

Stockholding and non-stockholding local authorities

Non-stockholding local authorities have transferred their stock to an independent Registered Social Landlord and therefore do not own or manage their own social housing stock. RSLs own and manage social housing in these areas.

Stockholding local authorities own and manage their own housing stock, but RSLs still own and manage some stock in these areas.

Section 66, 73, and 75 duties

These are part of the Housing (Wales) Act 2014 and are discussed in detail on the following page.

Tenancy

This term has the same meaning as occupation contract under the Renting Homes (Wales) Act 2016.

Tenant

A social housing tenant is the primary individual in a household who rents a social home from an RSL or local authority. This term has the same meaning as contract-holder under the Renting Homes (Wales) Act 2016.

Under-occupancy charge

A UK Government policy which charges social housing tenants who live in a home which is judged to have more bedrooms than necessary. It is often described as 'the bedroom tax'.

Glossary addendum: Explanation of duties in the Housing (Wales) Act 2014

This report frequently refers to duties owed by local authorities through the Housing (Wales) Act 2014. This report focuses on the duties owed to people experiencing homelessness or at risk of experiencing homelessness. These are:

- Section 66 of the Housing (Wales) Act 2014¹ provides that a local authority must help to secure that suitable accommodation does not cease to be available for occupation if the authority is satisfied that the applicant is threatened with homelessness and is eligible for help. This is often referred to as the 'prevention duty'. This duty is owed to people who are at risk of becoming homeless within 56 days for example, if they have received an eviction notice and contact authorities for help.
- Section 73 of the Housing (Wales) Act² provides that a local authority must help to secure that suitable accommodation is available if the applicant is experiencing homeless. It lasts up to 56 days. This is often referred to as the 'relief duty'.
- Section 75 of the Housing (Wales) Act³ provides that a local authority must secure suitable accommodation for eligible applicants experiencing homelessness. This is often referred to as the 'final duty'. This duty expires under conditions outlined in Section 67, including if an offer of accommodation is refused or if long-term accommodation is found.

The report describes people who are not owed one of the duties outlined above as being owed "no duty" or being "without a duty" under the Housing (Wales) Act 2014. In summary, these are people who are not considered to be experiencing – or at risk of experiencing – homelessness.

¹ Section 66 of the HWA 2014. More information at: Housing (Wales) Act 2014. Section 66.

² Section 73 of the HWA 2014. More information at: Housing (Wales) Act 2014. Section 73.

³ Section 75 of the HWA 2014. More information at: Housing (Wales) Act 2014. Section 75.

1. Introduction

Policy background

- 1.1 Social housing provides affordable and secure homes for people in need of housing and represents a key tool to prevent and mitigate homelessness in Wales. Social housing properties are made available through partnerships between the Welsh Government, local authorities, and registered social landlords (RSLs) with the goal of providing suitable housing to those who need it.
- 1.2 The legal framework that underpins the provision of social housing in Wales is the Housing Act 1996⁴, which lays the foundation for how social housing can be allocated by local housing authorities. In addition, the Housing (Wales) Act 2014⁵ was introduced to make provision for the standards of housing and to strengthen the prevention of homelessness, offer greater choice to prospective tenants and improve support services for vulnerable people.

In 2019, the Welsh Government published its strategy⁶ setting out its ambition to end homelessness in Wales by making it rare, brief, and unrepeated. The Ending Homelessness in Wales Action Plan (2021-2026)⁷ was launched in November 2021 – informed by the Homelessness Action Group's⁸ proposals to prevent and end homelessness in Wales. It reflects the changes anticipated to be required to prevent and end homelessness in Wales and make the shift to rapid rehousing. Following the recommendations of the Expert Review Panel's review of homelessness legislation from 2022-2023⁹, the Ending Homelessness White Paper¹⁰ was published by the Welsh Government and consulted upon. It sets out a range of proposals for changes to the law and policy with the goal of ending homelessness in Wales. It is based on the feedback of over 350 people with lived experience of homelessness and the social housing sector. All these documents recognise that

⁴ Housing Act 1996. Available at: Housing Act 1996.

⁵ Housing (Wales) Act 2014. Available at: Housing (Wales) Act 2014.

⁶ Welsh Government (2019), Strategy for Preventing and Ending Homelessness. Available at: <u>Homelessness</u> strategy | GOV.WALES.

⁷ Welsh Government (2021), 'Ending homelessness in Wales: a high level action plan 2021 to 2026'. Available at: Ending homelessness in Wales: a high level action plan 2021 to 2026 | GOV.WALES.

⁸ Homelessness Action Group. Available at: Homelessness Action Group | GOV.WALES.

⁹ Crisis (2023), 'Ending Homelessness in Wales: A Legislative Review'. Available at: <u>Wales Expert Review Panel.</u>

¹⁰ Welsh Government (2023), 'Ending Homelessness White Paper'. Available at: White Paper on ending homelessness in Wales | GOV.WALES.

- social housing allocations are a crucial tool for preventing and ending homelessness in Wales.
- 1.3 Local social housing administrative systems, available social housing stock, and local allocation policies vary hugely between local authorities across Wales which leads to differences in the prioritisation of housing needs, local partnership working, and data collection. As a result, the experience of tenants, applicants, and stakeholders can vary across local authorities. To support the Welsh Government's ambition to reform relevant legislation, it is vital to establish a detailed understanding of local structures, opportunities, challenges, as well as areas of best practice.

Research purpose

- 1.4 Alma Economics has been commissioned by the Welsh Government to explore the allocation of social housing across Welsh local authorities and RSLs. The research seeks to improve the understanding of the relationship between housing supply, nominations, allocations and the effective implementation of a Rapid Rehousing approach necessary to implement the Strategy for Preventing and Ending Homelessness in Wales¹¹. The work seeks to allow policymakers to
 - better understand the extent to which the needs of key groups in need of social housing, including those experiencing homelessness, are currently being met,
 - strengthen the existing understanding of available stock,
 - establish robust insights into local partnership working between local authorities and RSLs,
 - provide an overview of current successes, challenges, and best practice across local systems.
- 1.5 The work consists of two main pillars. First, the research sought to establish an improved quantitative evidence base of current social housing demand and processes through a primary data collection exercise with local authorities on the housing register, allocations, nominations and offers to social housing applicants. The second pillar consists of extensive fieldwork through qualitative interviews. We engaged with local authorities, RSLs, and stakeholder organisations including those representing service users or those experiencing homelessness. Interviewing these

¹¹ Rapid rehousing guidance. Available at: Rapid Rehousing: guidance [HTML] | GOV.WALES

- stakeholders allows for deeper insights into local policies, administrative structures, and future learnings.
- 1.6 This research is informed by a feasibility study¹² into researching social housing allocations, which was published by the Welsh Government based on research conducted by Alma Economics. The feasibility study interviewed a sample of four local authorities to understand the available data and gain insight into how allocations work. This further informed how fieldworks tools were developed and research was conducted for this body of work. This report furthermore builds upon a wide range of relevant literature, including Bec Woolley's (2023)¹³ report on social housing allocations in Wales which was commissioned by the Welsh Government, Community Housing Cymru, and the Welsh Local Government Association. Woolley's report primarily used a qualitative survey of housing associations and local authorities across Wales, which was supplemented by case studies of five geographic areas. The report is useful and includes many detailed quotations from the survey which complement this report. It found a severe lack of stock in social housing and described the social housing system as an 'ecosystem', in which policy should aim to maximise 'flow' while strongly considering unintended consequences. This report builds upon Woolley's report and recommendation for further research by interviewing more organisations and collecting detailed quantitative data on social housing allocations from local authorities.

Report structure

- 1.7 The remainder of this report is structured as follows:
 - Section 2 outlines the research aims and methodology, while also discussing this project's limitations.
 - Section 3 presents quantitative and qualitative evidence regarding how social housing demand is met by local authorities and RSLs across Wales, with a focus on household size, experiences of homelessness, and protected characteristics.

¹² Welsh Government (2023), 'Social housing allocations feasibility study'. Available at: <u>Social housing</u> allocations feasibility study | GOV.WALES.

¹³ Bec Woolley (2023), 'Allocations: Understanding more, in the context of homelessness in Wales'. Available at: White Paper on ending homelessness in Wales | GOV.WALES.

- Section 4 includes quantitative and qualitative findings regarding how allocations are made across Wales. It outlines the strengths and challenges of different allocation systems.
- Section 5 sets out the successes, challenges, and best practices in current systems. It highlights 'pillars of success' among partnerships with effective outcomes, the elements of allocations systems which often present challenges, the potential for policy and wider changes, and identifies best practices and recommendations.
- Section 6 outlines how data is currently used for decision-making in social housing allocations and the opportunities to improve this.
- Section 7 draws conclusions from the report as a whole.

2. Research approach

Research aims

2.1 This research focuses on two core components: (i) data collection and analysis at the local authority level, focusing on housing register data, nominations, allocations, and offers; and (ii) engagement with local authorities, registered social landlords (RSLs), and a variety of stakeholder organisations through semi-structured interviews. The data collection was undertaken between March and July 2024 with results being discussed throughout the following sections.

Methodology

Approach to quantitative data collection

- 2.2 The quantitative component of this research focused on addressing limitations and gaps in social housing data, building on what is already collected nationally. Official statistics includes information on social housing stock, including total number of stock and rents¹⁴ in each local authority, the number of lettings¹⁵, sales of social housing¹⁶, tenancies in rent arrears¹⁷ and number of vacancies¹⁸. However, there are no official statistics setting out the characteristics of those accessing the social housing system, including those who are waiting for social housing (households on the housing register) or the number of households allocated social housing. In addition, while the Welsh Government has data on homelessness levels from data collected on number of individuals in temporary accommodation and number of individuals who are sleeping rough, there is an unreliable and inconsistent understanding of social housing allocations to individuals experiencing homelessness. This research therefore sought to address these gaps through primary data collection to create a more comprehensive analytical picture of social housing allocations.
- 2.3 Primary data collection was conducted through a user-friendly spreadsheet which was sent to all 22 local authorities to complete. Each spreadsheet had 6 tabs, which

¹⁴ Welsh Government (n.d), 'Social housing stock and rents'. Available at: <u>Social landlord housing stock and rents | GOV.WALES.</u>

¹⁵ Welsh Government (n.d.), 'Social housing lettings'. Available at: <u>Social housing vacancies, lettings and arrears | GOV.WALES.</u>

¹⁶ Welsh Government (n.d.), 'Social landlord housing sales'. Available at: <u>Social landlord housing sales |</u> GOV.WALES.

¹⁷ Welsh Government (n.d.), 'Social housing rent arrears.' Available at: <u>Social housing vacancies, lettings and arrears | GOV.WALES.</u>

¹⁸ Welsh Government (n.d.), 'Social housing vacancies.' Available at: <u>Social housing vacancies, lettings and arrears | GOV.WALES.</u>

included: (i) details of the local authority, including having a Common Housing Register or nominations agreement, (iii) number of households on the housing register, (iv) number of households that have been allocated to social housing, (v) number of households that have been offered social housing, and (vi) number of households that have been nominated to social housing. All data in sections (iii) to (vi) included breakdowns by duty¹⁹ and other household characteristics.²⁰ All guidance and guestions asked can be found in Annex E. Templates were collected from March 2024 to July 2024, indicating that all data collected reflects a "snapshot" of social housing demand and allocations in this period, except for questions which ask local authorities to provide historical data. This includes asking about the number of households on the housing register a year previously. A total of 16 data templates were received, which were broadly representative of the true population both in terms of stock-holding local authorities and their rural-urban distribution. Authorities were determined to be rural, urban, valley, or other in accordance with StatsWales guidance.²¹ The sample representation is shown below in Table 1 and Table 2.

Table 1. Data collection sample - Stock holding local authorities

Local Authority Type	Number of Local Authorities	Data Template Sample
Stock-holding	11 (50.0%)	8 (50.0%)
Non stock-holding	11 (50.0%)	8 (50.0%)

Source: Primary social housing data collected by Alma Economics from a sample of 16 Welsh local authorities.

Table 2. Data collection sample - Rural-urban classification²²

Local Authority Type	Number of Local Authorities	Data Template Sample
Rural	9 (41.0%)	6 (37.5%)
Urban	3 (13.6%)	3 (18.75%)
Valley	5 (22.7%)	3 (18.75%)
Other	5 (22.7%)	4 (25.0%)

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¹⁹ This refers to the duties owed to people experiencing – or at-risk of experiencing – homelessness, which are found in the Housing (Wales) Act 2014. This is described in greater detail in the Glossary at the beginning of the report.

²⁰ Characteristics include: size of household, number of bedrooms needed, age, employment status, disability status, ethnic group or race, sex and gender, sexual orientation. This is the same across data collected on the housing register, allocations, nominations and offers.

²¹ StatsWales (2008), 'Rural Wales – definitions and how to choose between them'. Available at: <u>Rural Wales:</u> definitions and how to choose between them | GOV.WALES.

²² StatsWales (2008), 'Rural Wales – definitions and how to choose between them'. Available at: <u>Rural Wales:</u> definitions and how to choose between them | GOV.WALES.

Source: Primary social housing data collected by Alma Economics from a sample of 16 Welsh local authorities.

Quantitative data analysis

2.4 Data templates were cleaned for inconsistencies or data errors and then organised into 6 different datasets by type of data provided, including (i) allocation details of each local authority, (ii) housing register, (iii) allocations, (iv) nominations and (iv) offers. Summary statistics, cross-tabulations and visual representations were then calculated for each dataset by (i) property or demographic characteristic, (ii) duty type, (iii) stock-holding vs non-stockholding local authorities, and (iv) rural-urban classification. Other metrics, including allocation rates per 1000 households, were also calculated using social housing stock data from StatsWales²³.

Data quality

- 2.5 There are several limitations regarding the quality of data provided through this data collection exercise. While the templates asked for information regarding demographic characteristics and offers and nominations, these were provided at very low completion rates to the extent that it was not possible to conduct robust analysis with this information. This was typically cited as too burdensome for local authorities to complete, as it would require significant manual reporting with a high probability of human error. Due to data quality concerns, this report does not include any demographic analysis. However, aggregate data on the number of households on the housing register and allocations had very high completion rates, with the majority of local authorities providing breakdowns at the duty level. Limitations with this data include:
 - Local authorities are only able to provide a current snapshot of the data they
 hold. This means they are not able to provide data for a specific period
 unless they happened to pull data at that time. In addition, data templates
 were collected between March 2024 and July 2024 which means there is
 some timeline discrepancy in the snapshot each local authority provided.
 Combined, these factors mean that the data comparisons were made over
 slightly different time periods.
 - All social housing data is based on the "main applicant", indicating that most characteristics information represents a single person instead of their full households. It also means that a single household represented could be a

²³ Welsh Government (n.d), 'Social housing stock and rents'. Available at: <u>Social landlord housing stock and rents</u> | GOV.WALES.

- single person or a family of four, leading to some inconsistencies in how the data is interpreted. In addition, some local authorities can provide breakdowns by duty, while others can only offer aggregate figures.
- There are inherent limitations to the data collected because it is administrative local authority data. This means there are likely variations between local authorities in how social housing data is managed, maintained, and processed for both the housing register and allocations data. Local authorities have different approaches to the updating of housing registers, nonetheless most conduct annual large-scale updates of housing register information. A household may apply to more than one local authority, or to more than one register within an authority where a CHR is not held, consequently some households are likely to be included on more than one register, resulting in some double counting. Therefore, caution should be taken when making comparisons across local authorities or across years. This will have no impact on allocations data and calculated allocations rates which do not use data from housing registers. Allocations data and calculated allocations rates will, however, continue to face the limitations inherent to local administrative data as discussed above.
- A further limitation to this primary data collection exercise is that no quantitative data was collected from RSLs. This means the data from three local authorities which do not operate a Common Housing Register may not include all applicants as some may apply to RSL registers rather than the local authority registers which were considered for this research. Nonetheless, data was collected from 8 non-stockholding local authorities which do provide insight into housing register and allocations data from RSLs in those regions. In addition, 17 RSLs were interviewed for this project, meaning that RSL perspectives are well-represented in qualitative findings.

Approach to qualitative fieldwork

2.7 Fieldwork with local authorities, RSLs, and sector stakeholder organisations sought to provide an improved understanding of local processes and structures for the allocation of social housing in Wales, as well as identifying examples of good practice across local authority areas. The focus throughout the interviews was the extent to which needs of applicants to social housing and current tenants could currently be met, stock levels available, local administrative systems and

- partnership working, as well as wider successes and challenges at the local level. The development of the fieldwork tools was conducted in close collaboration with the Welsh Government. Discussion guides are included in Annexe B-D.
- 2.8 Representatives from 22 local authority teams responsible for housing, allocations, or adjacent policy areas were invited to interviews. Contact details were shared with the agreement of interviewees through the Welsh Government relationship managers. A further 17 RSLs were recruited for interviews to shed light on varying local perspectives from crucial stakeholders. RSL contact details were shared with agreement of interviewees, either by local authorities, by Community Housing Cymru (CHC), and at other times by reaching out through online contact forms or publicly available email contact details. The RSLs interviewed for this project operate across north, south, east, and west Wales and in both urban and rural local authorities. They also include RSLs formed as a result of stock transfers and other RSLs. In addition to local authorities and RSLs, 10 stakeholder organisations' contact details were either shared by the Welsh Government, following agreement from interviewees, or via publicly available contact details identified online. In cases of non-response following initial invites, follow-up invitations were sent to maximise representation of sector stakeholders. An overview of all participating interviewees can be found in Annex A. The focus of this research was on local authorities and RSLS. However, to reflect wider perspectives, ten stakeholder organisations were interviewed – such as Crisis, Shelter, Tai Pawb, HBF, and TPAS. This means that while we did not engage with social housing tenants or people on social housing waiting lists directly, which should be recognised as a limitation of this research, we engaged with representatives who could provide some insights on these experiences.
- 2.9 Data obtained through the semi-structured interviews were entered into a coding scheme and subsequently assessed via thematic analysis. This approach allows the detection of common themes and overarching trends across interviewees, while also considering the different allocation systems used by individual local authorities.

3. Meeting social housing demand through available stock

3.1 The following sections detail the insights gained from the analysis of data collected from local authorities on the status of their housing registers, in addition to interviews with a range of stakeholders, including all 22 Welsh local authorities, 17 registered social landlords (RSLs), and 10 stakeholder organisations. For details on which organisations were interviewed, see Annex A. Interviews were conducted between March and June 2024 and held in both English and Welsh. Separate discussion guides were used for each stakeholder type which can be found in Annex B-D. Key topics covered included the extent to which needs of groups applying for social housing could be met, how local allocations systems worked in practice, as well as wider successes, challenges, and best practices.

Overview of the housing register

3.2 Local authorities were asked about the number of households currently on their housing register in the present period (between March and July 2024, depending on completion), and to compare against the number of households on the housing register a year previously. Housing register databases can only provide a snapshot of the current status of applicants, so many local authorities were unable to provide historical data unless they happened to download data previously. For example, one local authority could only provide historical data from 2022, which is why Figure 1 is labelled "1 year ago or longer". Of the 16 local authorities who submitted data templates, 10 were able to provide historical data, so that is the sample shown in Figure 1. From the sample of 10 local authorities in Figure 1, there is a clear upward trajectory in the number of households on housing registers from 2022/2023 to 2024, showing a 16% increase over time. It's important to note that there are likely data quality issues and the extent to which this increase is due to real changes or differences in data quality is not known without further assessment into each data system, due to the nuances of administrations from which the data was collected. However, given our qualitative findings this trend is likely to be reflective of real trends, even if the numbers are not fully accurate.

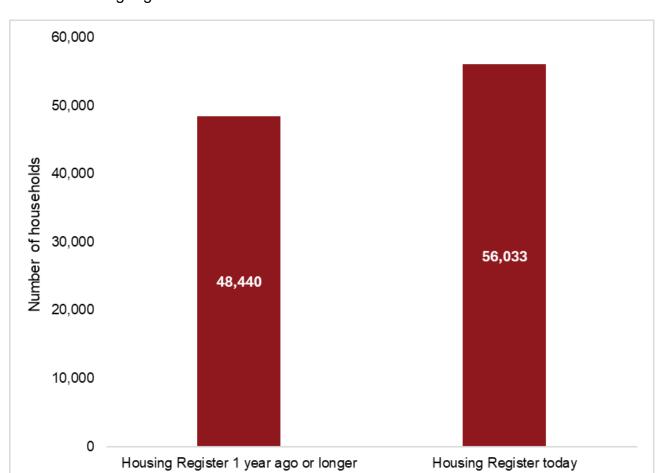


Figure 1. Total number of households on housing registers over time

Housing register data from 10 local authorities between 2022-2024

Source: Analysis by Alma Economics from primary social housing data collected from Welsh Local Authorities.

- 3.3 As shown in Figure 2, there is a higher proportion of households owed a duty in stock-holding local authorities (18.4%) compared to non-stock holding local authorities, where households owed a duty make up 8.1% of the housing register. This is notable for Section 66 duties, which make up 7.5% of the housing register for stock-holding local authorities but only 1.6% for local authorities without social housing stock.
- 3.4 Local authorities were also asked to provide breakdowns of households on the housing register by duty type as per the Housing (Wales) Act 2014, including no duty, Section 66, Section 73 or Section 75.²⁴ Out of the sample of 16, 2 local authorities could not provide full breakdowns of households by duty on the housing register. They report either needing to combine two duties (Section 66 and Section

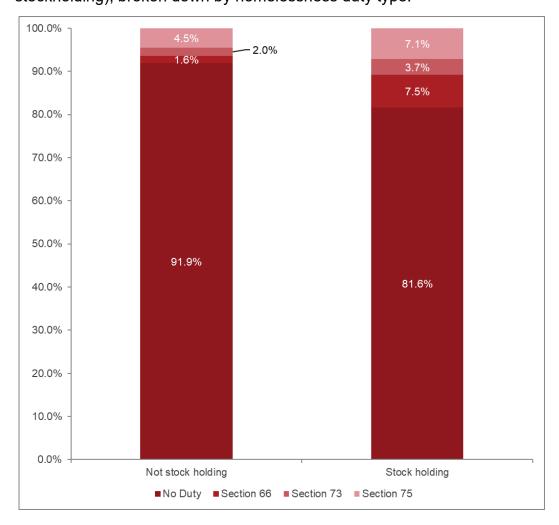
18

²⁴ These duties are explained as part of the Glossary at the beginning of the report.

73) or putting all households owed a duty ("homeless households") under Section 75 for reporting. For the former case, all cases were aggregated under Section 73. Though there are some discrepancies due to difference in reporting, the total number of affected households make up approximately 0.2% of the total sample, so the proportions are still largely correct, and therefore these local authorities are included in the sample represented in Figures 2 and 3.

Figure 2. Proportion of households by duty type on the housing register (stock-holding vs non-stockholding local authorities)

3.5 Housing register data from 16 local authorities (8 stock holding, 8 non-stockholding), broken down by homelessness duty type.



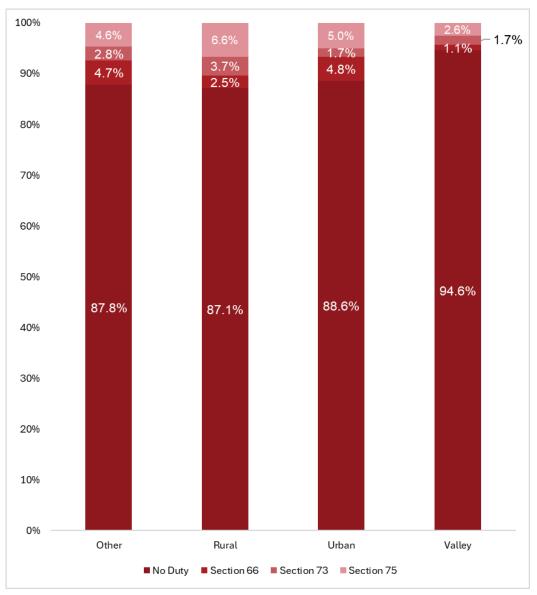
Source: Analysis by Alma Economics from primary social housing data collected from Welsh Local Authorities.

3.6 The proportion of households owed duties on the housing register also varies geographically across Wales, as shown in Figure 3. This demonstrates that Valley local authorities have a lower proportion (5.4%) of households owed a duty on their housing registers, compared to other geographic areas which average at

approximately 12%. Rural, urban and other areas have comparable proportions of households owed a duty on their housing registers. Note that, as mentioned previously, there is likely to be variation between administrative data systems across local authorities.

Figure 3. Proportion of households by duty type on the housing register (local authority rural-urban classification²⁵)

Housing register data from 16 local authorities (4 classified as Other, 6 classified as Rural, 3 classified as Urban, 3 classified as Valley)



Source: Analysis by Alma Economics from primary social housing data collected from Welsh Local Authorities.

²⁵ StatsWales (2008), 'Rural Wales – definitions and how to choose between them'. Available at: Rural Wales: definitions and how to choose between them | GOV.WALES.

Social housing demand for groups with reasonable preferences

3.7 Interviewees from local authorities, RSLs, and stakeholder organisations discussed the impact of how social housing is currently allocated to different groups. It is important to recognise that individuals and households may have multiple intersecting identities at once, and these may influence or intensify challenges. This section first focuses on people experiencing homelessness and then people at-risk of experiencing homelessness before turning to single people, larger families and people in overcrowded homes. The section's focus then turns to disabled people, people with multiple support needs, and groups sharing protected characteristics.

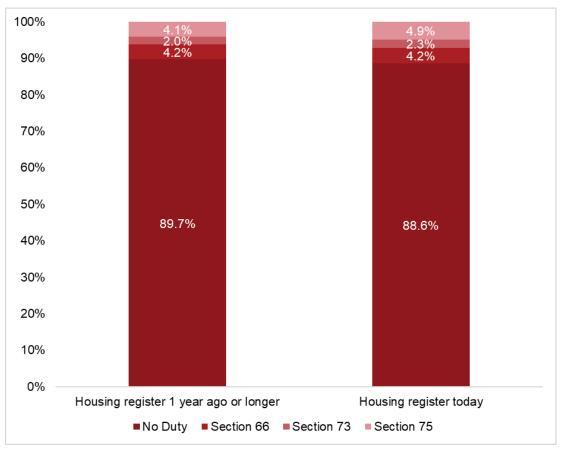
People experiencing homelessness

- 3.8 Representatives from local authorities, RSLs, and stakeholder organisations all agreed that the number of people presenting to local authorities as homeless has increased dramatically in recent years.
- 3.9 In our primary data collection exercise, local authorities were also asked to provide the number of households on the housing register currently and historically by duty type, this is shown in Figure 4. This data faces the same quality issues previously identified, where only some local authorities can provide historical data, with one local authority only able to provide data from 2022.²⁶ The sample in Figure 4 is further reduced as one local authority could only provide housing register data as a total, not broken down by duty type. Therefore, the sample for Figure 4 is 9 local authorities, compared to 10 in Figure 1.
- 3.10 As shown in Figure 4, this proportional increase in social housing demand for duty-holding households is being driven by households owed a Section 75 and 66 duty, where there has been a collective increase of 1.1 percentage points. Overall, the number of households owed a duty on the housing register has increased by 29% compared to historical housing register data where available.

²⁶ This is why Figure 4 states "1 year ago or longer", to account for historical data that is longer than one year old.

Figure 4. Proportion of households on housing register by duty type over time

Housing register data from 9 local authorities (reduced sample due to missing historical data for 7 local authorities)



Source: Analysis by Alma Economics from primary social housing data collected from Welsh Local Authorities.

- 3.11 Interviewees explained that people presenting as homeless are now more likely to have multiple support needs such as mental health challenges or substance use which require greater use of support services than before the COVID-19 pandemic. In the words of one local authority interviewee, "there are probably more people [seeking social housing] in higher levels of need now than we've ever seen previously and they are more complex in terms of their needs as well." Due to the increase in homeless presentations, people experiencing homelessness are placed and stay in temporary accommodation for longer periods of time. Some local authorities stated that people experiencing homelessness waited "a few weeks" for an allocation before the pandemic but now frequently spend 10 to 24 months in temporary accommodation before receiving an allocation for social housing.
- 3.12 Representatives of homelessness charities emphasised the negative consequences of spending long periods of time in temporary accommodation, arguing that poorquality temporary accommodation causes severe stress and poor mental health for

people who already face trauma from homelessness. In the words of one charity, "when people are waiting in temporary accommodation for social housing, they feel like their lives are on hold. You know, there's an uncertainty about their future and an insecurity about their present lives. They can't plan for the future." In addition, a range of interviewees raised the point that temporary accommodation can be located far away from support networks, workplaces or educational opportunities which effects the lives of those living there. Many local allocation systems were described as lacking clarity regarding when people will be allocated social housing, and therefore leave temporary accommodation, which contributes to stress. One organisation referred to a mother with small children in temporary accommodation, who described the experience as "like a prison sentence - but you didn't know when the end of your sentence was." Interviewees described a cycle of increasing challenges, whereby high demand due to the consequences of the COVID-19 pandemic and cost-of-living crisis has resulted in longer waiting lists, more time spent in temporary accommodation, and higher support needs across local authorities.

3.13 A wide variety of answers were provided when interviewees were asked to describe the barriers facing applicants experiencing homelessness. A minority of interviewees representing local authorities and RSLs stated that people with experiences of homelessness face very few barriers when applying for social housing, pointing to their preferential banding for applicants with Section 73 and 75 duties²⁷ and the support provided to complete applications for social housing. However, the majority of interviewees representing local authorities, RSLs, and wider stakeholder organisations stated that people experiencing homelessness continue to face serious barriers. These include: (i) challenges in understanding legalistic allocation systems and completing lengthy forms, especially when facing the stress and trauma of homelessness; (ii) challenges accessing digital services, especially when in temporary accommodation with limited digital access; and (iii) a lack of support to maintain a social tenancy following the first weeks of a tenant entering a property, especially for first-time tenants. Many interviewees stated that while histories of rent arrears or anti-social behaviour (ASB) often prevented allocations before the pandemic, attitudes were shifting to ensure these challenges do not prevent allocations but lead to more support. Some interviewees noted that

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²⁷ These duties are explained as part of the Glossary at the beginning of the report. See also 'Priority Banding System' in the Glossary for an explanation of banding systems.

rent arrears and ASB can still prevent allocations despite policy changes at a local and national level, but expressed optimism that new working practices and training of staff will ensure rent arrears and ASB are not barriers to successful allocations.

People at risk of experiencing homelessness

- 3.14 Interviewees in the large majority of local authorities explained that people at risk of homelessness received a lower priority for allocations than those who are already experiencing homelessness. An exception can be found in Carmarthenshire's Emergency Allocations Policy²⁸, which places people at risk of homelessness within the highest band alongside people currently experiencing homelessness. The ambition is to prevent homelessness to avoid the associated traumatic experiences, including traumatic experiences related to temporary accommodation.
- 3.15 Local authorities often view using mechanisms outside of the social housing allocations system as most suitable for those at-risk of homelessness. Therefore, instead of granting strong prioritisation for people at-risk of homelessness within social housing allocation systems (e.g. priority banding), "floating support" is often offered by local authorities to people at risk of homelessness. This refers to shortterm support by a professional to support people to maintain their tenancy, including by ensuring they have the skills to maintain a tenancy and receive the benefits they are entitled to.²⁹ Local authority representatives also stated that the Homelessness Prevention Grant and Housing Support Grant are used to clear rent arrears owed by tenants in the private rental sector who may otherwise be evicted. Local authorities described how they broker and underwrite re-payment plans between tenants and private sector landlords to prevent evictions. Local authority interviewees who outlined their preventative work viewed it as vitally important and often identified preventing homelessness as the more effective method to end homelessness when compared to substantially increasing allocation rates to homeless households. However, some local authority interviewees were concerned that private sector landlords were leaving the market because of increased mortgage rates and perceived unintended consequences of the Renting Homes (Wales) Act. As partnerships with the private rental sector can be a key part of homelessness prevention mechanisms used by local authorities, this can undermine prevention

²⁸ Carmarthenshire County Council, 'Emergency Social Housing Allocations Policy'. Available at: <u>Emergency Social Housing Allocations Policy</u>.

²⁹ Many local authorities and RSLs deliver this service. For example, see the details of Caerphilly County Borough Council's service: <u>Caerphilly - Caerphilly County Borough</u>

- efforts and increase reliance on social housing allocation systems to prevent and alleviate homelessness.
- 3.16 Interviewees explicitly welcomed the White Paper's³⁰ proposal to increase the 56-day 'prevention duty' period to 6 months, although some local authorities stated that they already work to prevent evictions into homelessness at this earlier stage.

 Interviewees raised concerns that cuts if there were to be cuts to the Homelessness Prevention Grant this would undermine these efforts.

Single applicants

- 3.17 Interviewees often stated that the number of single applicants on housing registers has increased dramatically in recent years. Interviewees from local authorities and RSLs stated that single people with a reasonable preference often have experiences of homelessness or supported accommodation. Partly due to the trauma of experiencing homelessness, interviewees stated that single applicants require additional support more often compared to other household sizes. This means that it is important to consider both the barriers facing people with experience of homelessness and those facing people with multiple support needs when considering how social housing allocation systems meet the needs of single applicants.
- 3.18 Interviewees strongly agreed that the main reason for lower allocation rates to single people is a severe lack of social housing properties with one bedroom. RSLs also warned against allocating many single homeless applicants in one small local community for example, a block of one-bedroom flats or the same housing estate as this was seen to increase the likelihood of tenancy management issues and unsustainable local community outcomes with adverse impacts on neighbours, including other social housing tenants.
- 3.19 Several interviewees argued that the under-occupancy charge³¹ prevents the allocation of two-bedroom properties to people who only qualify for one bedroom because the potential tenant would fail affordability tests. A few local authority interviewees stated that they mitigate the cost of the charge to allow allocations of single people to two-bedroom properties. A further group of local authority interviewees reported that they are considering mitigating the charge for the first time in order to allocate their properties more flexibly. Meanwhile, another group of

³⁰ Welsh Government (2023), Ending Homelessness White Paper. Available at: White Paper on ending homelessness in Wales | GOV.WALES.

³¹ Also known as the 'bedroom tax'. Please see more information in the glossary.

local authority interviewees did not view this approach as a suitable option, with some stating that this is because their local allocation policies forbid the allocation of two-bedroom properties to people with a one-bed need.

3.20 In some instances, affordability checks – including those surrounding the under-occupancy charge – are conducted at relatively late stages of an allocation process. Some interviewees from stakeholder organisations raised the emotional impact of this – as it can lead to disappointment at late stages of the allocations process and futile bids under choice-based letting schemes.

Large families

- 3.21 Representatives of local authorities and RSLs stated that allocations for smaller households that require a two- or three-bedroom property are often effective. In this instance, allocation policies and reasonable preferences were seen to determine the time these households spend on waiting lists.
- 3.22 However, a large majority of local authority and RSL interviewees were concerned by a lack of four-bedroom and larger properties in their local area. This was a particularly strong theme in areas with older terraced stock, especially in the valleys in south Wales. Interviewees suggested that the consequence of a lack of four-bedroom or larger properties is that larger families experiencing homelessness spend long periods of time in temporary accommodation and other families face severe overcrowding.
- 3.23 Increasing the supply of four-bedroom and larger properties was identified as crucial to reducing waiting times for social housing among larger households.
 - People in overcrowded properties
- 3.24 Some interviewees representing RSLs especially those operating in urbanised parts of south Wales stated that overcrowding is a "hidden issue" and a "crisis" in Wales in social housing and the private rental sector. A few RSLs noted that overcrowding is frequently overlooked since it does not result in immediate financial costs for local authorities (unlike homelessness, with its cost felt through temporary accommodation) and its consequences may be viewed as less urgent. As a path forward, RSLs often suggested that local authorities and the Welsh Government should support and fund the development of more four-bedroom or larger properties to remedy the "overcrowding crisis".

- allocation policies as drivers of overcrowding in social housing. These factors were seen to prevent families from being allocated properties that are slightly larger than they require in the short term, even if this is the most suitable allocation over the medium and longer term. Social housing can become overcrowded as households require more bedrooms because of new or growing children. This increases strain on the allocations system by encouraging families to re-apply for social housing allocations through housing registers or by requesting internal management transfers to larger properties. More flexible allocation policies and funding to mitigate the under-occupancy charge may allow more sustainable allocations, which allow children to remain in one home and reduce unnecessary re-applications for social housing.
- 3.26 Charities working to prevent and tackle homelessness also raised concerns over how the needs of people in overcrowded housing are met. One charity referring to evidence from the 2021 Census³² argued that overcrowding has a disproportionate impact on Black, Asian, and Minority Ethnic communities in Wales. Overcrowding was also identified as a challenge in cities across Wales, especially for larger families arriving to Wales under different humanitarian resettlement schemes. The charity representative argued that loft conversions often funded through the Welsh Government's Transitional Accommodation Capital Funding Programme (TACP) are an example of best practice in alleviating overcrowding and preventing homelessness.

Disabled people

3.27 Interviewees from almost all local authorities described long waiting times for disabled people needing adapted properties. The root cause of delays was identified in the challenge of adapting existing properties to meet the needs of disabled tenants. RSLs operating in the south of Wales raised this issue most frequently, given that they often operated in areas with older, terraced housing stock.

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³² According to the 2021 Census, across Wales, 21.1% of people within the "Black, Black Welsh, Black British, African, or Caribbean" high-level ethnic group experience overcrowding. 24.6% of people within the "Gypsy and Irish Traveller" ethnic group experience overcrowding. 15% of people within the "Asian, Asian Welsh, or Asian British" ethnic group and 4% of people within the "White" ethnic group in Wales experience overcrowding. More information is available at: Ethnic group differences in health, housing, education and economic status in Wales (Census 2021) [HTML] | GOV.WALES.

- 3.28 The rapid development of new-build properties which are designed and located to be more accessible, interviewees stated, could be the answer. However, RSLs noted that planning restrictions and limited land availability can prevent and slow these developments. In addition, RSLs raised the difficulty of reallocating adapted properties once a contract ends, as it can be challenging to make the best use of properties with specific adaptations. This was described as resulting in properties either remaining empty or RSLs having to remove previously installed adaptations at additional costs.
- In addition to recognising the lack of stock and long waiting times for disabled applicants, stakeholder organisations stated that disabled people are often required to repeatedly describe their needs to officials throughout the allocation process. This was seen as contradicting best practice for a trauma-informed approach. Some partnerships fund dedicated Occupational Therapists (OTs) within local authority housing teams to undertake trauma-informed and person-centred assessments to ensure the needs of disabled people are met, and adapted properties are allocated most effectively. Other local authorities reported using dedicated registers of adapted properties to ensure more data on adaptations and accessibility could be used when determining allocations. Both examples were seen to reduce the need for disabled people to repeatedly explain their needs to officials, and both are discussed further in section 5.29.

People with multiple support needs

- 3.30 Local authority and RSL interviewees described an increase in the number of people registering for social housing with multiple support needs over recent years. Interviewees explained that many people with multiple support needs have experienced homelessness, require adapted housing, and are often single applicants. Partly due to the lack of suitable properties, interviewees suggested that people with multiple support needs tend to be among the applicants who have already been on social housing waiting lists the longest. Stakeholder organisations warned of the emotional toll of long waiting times which can exacerbate support needs. According to some RSLs, long waiting lists can also pressure people to accept allocations which are far away from their support networks, which may in turn exacerbate the demand for support services once an allocation has been made.
- 3.31 While recognising that some people with support needs benefit from allocations near their support networks, some stakeholder organisations argued that local

connection rules can also prevent people with multiple support needs from being able to move to a social property in a new community for a fresh start. In some instances, interviewees argued that the chance for a fresh start with adequate support services in place is the best option for sustainable tenancy outcomes.

- 3.32 Many RSL interviewees outlined a lack of support services commissioned by local authorities when housing people with multiple support needs. Such support, if offered by local authorities, is often only available for the first days and weeks of a tenancy. After this, in the words of a homelessness charity, "it has to reach absolute crisis point on the verge of eviction before people can get a chance of accessing mental health support services."
- 3.33 Some interviewees representing RSLs described the roles of the housing officers within housing associations as having become "unofficial social work", which was seen to undermine workforce morale and retention. This was perceived as particularly challenging following discharges from hospital and prison. In the words of one local authority, "we expect RSLs to be able to manage cases that health are saying they have no provision for and yet we're putting them into our community and expect people with no experience [to take responsibility for them] sometimes there will be specialist support services, but, the expectation on RSLs is huge and I think we need to recognise that."
- 3.34 Subject to personal circumstances, applicants with multiple support needs may be unable to live in certain areas or types of properties due to local lettings policies. Interviewees identified extreme cases where prison leavers with MAPPA³³ arrangements cannot be allocated social housing within a local authority, but also lack the local connection requirements to be allocated housing elsewhere. This can result in lengthy periods of staying in temporary accommodation.

Groups sharing protected characteristics

3.35 This section focuses on groups with protected characteristics that have not been discussed in detail previously. It is crucial to consider that applicants for social housing may have multiple intersecting protected characteristics and face unique challenges. This section presents interviewees' views on the experience of allocations among older people, young people, LGBTQ+ communities, survivors of VAWDASV (Violence against Women, Domestic Abuse and Sexual Violence), and

³³ Multi-agency public protection arrangements. More information available at: <u>Multi-agency public protection</u> arrangements (MAPPA): Guidance - GOV.UK.

- Black, Asian, and Minority Ethnic communities. We will also consider Welsh speakers within this section.
- Many representatives of local authorities stated that they held a relatively high 3.36 proportion of social housing exclusively for older people. However, some of this accommodation is unsuitable for disabled older people due to accessibility challenges (e.g., bungalows built in hilly areas or with step access). Local authority interviewees also identified bedsits as less popular among applicants and stated that they are often being replaced with other forms of retirement accommodation. Another challenge identified by RSLs is that an increasing number of people being allocated accommodation built for retirees are older people still in work or in receipt of Universal Credit. Previously, as RSLs explained, most tenants in these properties would have received stable pensions which could be relied upon to cover rental costs. However, RSLs expressed concerns that current older tenants, who are in work or in-receipt of Universal Credit, may no longer be able to afford the rental costs of sheltered accommodation should they face benefits sanctions or unemployment. In addition, some RSLs raised the longer-term challenge of an ageing population which would increase demand for older person's accommodation in the future.
- 3.37 Young people were seen to face major challenges accessing social housing. A stakeholder organisation interviewee noted that Local Housing Allowance (LHA) is capped at the lower 'shared accommodation rate' for those under the age of 35³⁴ and that this has a major impact on the social housing which is affordable for young people, especially those with no access to familial support such as some care leavers or estranged LGBTQ+ young people. The difference between the shared accommodation rate and the one-bedroom rate can vary widely between areas. For example, in south-east Wales, this difference amounts to £65.34 a week in Cardiff, £46.00 a week in Torfaen, and £2.90 a week in Caerphilly at the LHA rates for April 2024 to March 2025.³⁵ This suggests the under-35 cap has a varying impact in different areas. More broadly, a homelessness charity referencing research from Crisis³⁶ noted the average age at which a single person first experiences

³⁴ More information on the 'shared accommodation rate' available here: House of Commons Library, Housing Benefit: Shared Accommodation Rate (2022). Available at: <u>Housing Benefit: Shared Accommodation Rate - House of Commons Library</u>.

³⁵ Guidance on Local Housing Allowance Rates. For details, see <u>Local Housing Allowance (LHA) rates |</u> GOV.WALES.

³⁶ Crisis, 'Nations apart? Experiences of single people across Great Britain' (2014). Available at: Experiences of single people across Great Britain | Crisis UK.

homelessness is 22 years old. Consequently, the interviewee emphasised the opportunity to break the cycle and trauma of homelessness by prioritising early intervention and the allocation of younger people into sustainable social housing tenancies.

- 3.38 LGBTQ+ people, according to some stakeholder organisations, can feel forced to out themselves as LGBTQ+ repeatedly throughout the allocation process in order to receive a suitable offer. For example, an interviewee from a stakeholder organisation stated that elements of the allocations system "lack understanding of the distinctive causes of why young people who are LGBTQ+ may be coming into contact with the [social housing] system – meaning they are potentially being made to out themselves by housing officers and support workers to gain access to services" or face "people asking questions in inappropriate ways, with not too much purpose." In addition, interviewees suggested that allocations and temporary accommodation in properties with shared facilities can be inappropriate for some LGBTQ+ people – especially trans people who are in the process of transitioning. Interviewees identified supported accommodation for LGBTQ+ people, such as Tŷ Pride in Denbighshire, as an innovative and successful scheme which should be expanded. In addition, interviewees from stakeholder organisations identified local connection requirements in allocation policies as a barrier for LGBTQ+ people who wish to move away from areas which trigger trauma. Interviewees from these organisations welcomed the recognition of found families in the Ending Homelessness White Paper³⁷ as a positive step.
- 3.39 Survivors of Violence against Women, Domestic Abuse, and Sexual Violence (VAWDASV) often receive strong prioritisation in allocation systems. However, they also face barriers. Interviewees from stakeholder organisations stated that local connection requirements are perceived as a barrier by some survivors. By law, local connection rules must not allow applicants to be referred back to an area where they or a member of their household will be at-risk of abuse. Effective implementation of this does, however, rely on strong partnerships between local authority areas. Interviewees furthermore suggested that survivors often do not understand the social housing allocation processes and find the process complex and overwhelming. Because of this, urgent management transfers and direct nominations are sometimes used to quickly allocate survivors. It was also noted that

³⁷ Welsh Government (2021), 'Ending homelessness in Wales: a high level action plan 2021 to 2026'. Available at: Ending homelessness in Wales: a high level action plan 2021 to 2026 | GOV.WALES.

trauma can limit the areas in which people are willing to accept an allocation of social housing. A trauma-informed and person-centred approach is therefore crucial when allocating housing to VAWDASV survivors.

- 3.40 As discussed in section 3.26, interviewees outlined that Black, Asian, and Minority Ethnic people are more likely to live in overcrowded housing. In addition to this, interviewees discussed the importance of ensuring culturally appropriate cooking and washing facilities are available to social housing tenants. An interviewee from the wider housing sector raised a Tai Pawb (2024) report³⁸, which suggests communication and language barriers, including inaccurate translations, can undermine access to social housing and homelessness services for Black, Asian, and Minority Ethnic communities in Wales.
- 3.41 Services for Welsh speakers, interviewees from stakeholder organisations suggested, seem to have improved in recent years. Interviewees explained that more Welsh speakers can now access social housing and homelessness services in their preferred language. Many RSLs stated that their websites and advertisements for properties are always bilingual and some RSLs in Welsh-speaking communities primarily operate in Welsh. To strengthen the provision for Welsh speakers, some stakeholder organisations and RSLs suggested that applicants for social housing should be able to express their preference to be allocated a property in a Welsh-speaking community and nearby Welsh-medium schools for families with children.

Mismatch of stock and need

3.42 Interviewees from local authorities, RSLs, and stakeholder organisations claimed that Wales lacks social housing stock, identifying a severe shortage of some types of housing stock. This shortage was described as differing across house sizes, possibilities for adaptations, and location. Some interviewees argued that the availability of stock, not reasonable preferences or local allocation policies, was the main driver which determines when and whether people are allocated properties from social housing waiting lists. One local authority interviewee explained that "a lot of focus ends up on banding and the how the hierarchy of the banding looks, but what actually drives preference is how long it takes somebody to be re-housed, and that is driven by the availability of property." A local housing officer interviewee also

³⁸ Tai Pawb, 2024. The experience of housing in Wales of people from ethnic minority communities. See: Report: the housing experiences in Wales of people from ethnic minority communities - Tai Pawb

said: "All the work we did initially around identifying reasonable preference categories and our local need has gone out the window. We assumed that if we put them in there, people would move through the system. [...] That was the whole ethos of having the highest band, knowing they would go through the system quite quickly. But that doesn't happen anymore." Another local authority interviewee agreed but also stated that the lack of stock means that changes to allocation policies can only make a difference at the margins: "Obviously, the ultimate issue is there's not enough housing. You can do what you like with the allocation scheme, but there are not enough houses at the end of it."

3.43 This 'Mismatch of stock and need' section will focus on the perspectives of local authorities, RSLs, and stakeholder organisations from the wider housing sector on the availability of social housing stock compared to need. First, the provision of social housing stock by size, accommodation type, and location will be discussed. Subsequently, efforts to assess the need for social housing, including through use of data, will be summarised.

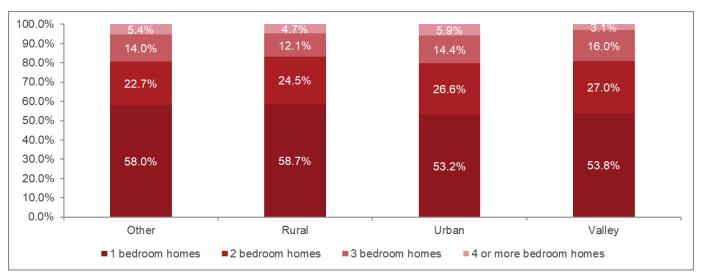
Size of accommodation

- 3.44 All interviewees recognised the mismatch between social housing stock and need varies by the size or number of bedrooms of properties. However, the most pronounced shortage identified by interviewees was of one-bedroom properties. This is further validated in the data provided by local authorities, where one-bedroom properties are the most in-demand property on housing registers, regardless of geographic location. This relationship is displayed in Figure 5, where one-bedroom properties make up over 50% of the number of bedrooms in demand on the housing register, with the highest being 59% of the housing register in rural local authorities.
- 3.45 21 of the 22 local authorities and a majority of the RSLs interviewed raised the severe lack of one-bedroom properties as a major challenge. Representatives of rural and semi-urban local authorities raised the severe shortage of one-bedroom properties in the strongest language. One local authority in the south-Wales valleys described the lack of one-bedroom accommodation as being at "crisis-level". Notably, several rural local authorities described a relatively large supply of one-bedroom properties that can only be let to older people (usually defined as people over the age of 55) under current local policies. In some cases, local authorities even reported challenges in filling such properties. Some local authorities therefore described local efforts of re-designating some properties restricted to older tenants

to make them available for general needs applicants – subject to local planning and political decision-making.

Figure 5. Number of bedrooms in demand on housing register by local authority classification³⁹

Housing register data across 15 local authorities by rural-urban classification (3 Other, 6 Rural, 3 Urban and 3 Valley).



Source: Analysis by Alma Economics from primary social housing data collected from Welsh Local Authorities.

- 3.46 Local authority and RSL interviewees highlighted barriers to increasing the supply of one-bedroom properties. These included a lack of land available for new developments in urban areas, difficulty obtaining planning permission for large developments of one-bedroom properties, and the higher financial cost for RSLs to develop one-bedroom properties compared to two or three-bedroom properties. In addition, some RSLs and local authorities expressed a focus on ensuring that clustered developments of one-bedroom properties whether in flats or estates are let to a variety of tenants. RSLs explained that they thought it crucial to promote sustainable tenancies and communities in which people with different support needs live as neighbours. At times, this motivated the use of "local lettings policies" to achieve this goal. This was seen by RSLs to prevent a concentration of support needs in one area, which could create tenancy management issues. More general challenges with development are discussed in section 3.57.
- 3.47 Interviewees presented a mixed picture of two-bedroom and three-bedroom properties. In some instances, they described an "abundance" of two-bedroom and

³⁹ StatsWales (2008), 'Rural Wales – definitions and how to choose between them'. Available at: <u>Rural Wales:</u> definitions and how to choose between them | GOV.WALES

three-bedroom properties. However, some local authorities representing cities stated that they face the most demand and longest waiting lists for two-bedroom properties, with particularly high demand for two-bedroom houses. A relatively large supply of two and three-bedroom properties relative to demand was most common in rural local authorities and the south-Wales valleys. RSLs with older stock stated that their portfolios include many two-bedroom flats and three-bedroom houses which could be more challenging to let due to a lack of demand relative to supply.

- 3.48 Some RSLs with many two-bedroom properties raised the impact of the underoccupancy charge on their two-bedroom properties as important, noting that many
 of these properties were developed when couples and single people could be
 allocated two-bedroom properties if necessary. Interviewees argued that the underoccupancy charge has contributed to the creation of an artificial decrease in
 demand for two-bedroom properties and a corresponding increase in demand for
 one-bedroom properties. Some interviewees stated that the under-occupancy
 charge led to growing families being allocated properties that will soon become too
 small given their needs. Instead, they encouraged allocating additional bedrooms
 for some families who seek larger properties to avoid overcrowding. In sum, some
 interviewees stated that the under-occupancy charge should be considered an
 important factor in explaining the higher demand for one-bedroom properties
 relative to two-bedroom properties in many parts of Wales.
- 3.49 Interviewees also emphasised a shortage of properties with four or more bedrooms throughout Wales. This challenge was described as particularly severe among RSLs and local authorities with older stock, especially those in the south-Wales valleys which have limited land available to develop larger properties. Demand for four-bedroom properties also appears to be proportionally higher in urban local authorities, as shown in Figure 5. The lack of larger properties was noted as a key driver of the challenges facing larger families and those suffering from overcrowding in social housing and temporary accommodation, discussed in section 3.21-26. The development of larger properties was reportedly underway in many local authorities. However, interviewees identified two key obstacles. The first was seen as a lack of suitable land available for development and challenges in obtaining planning permission. The second challenge was noted where large properties can be uneconomical for RSLs due to low Local Housing Allowance rates and the potential for lengthy voids between tenancies for particularly large properties (such as those

with 6 or more bedrooms). Wider challenges with property developments are discussed in section 3.57.

Property type

- 3.50 Interviewees also identified different levels of demand by property type. This section discusses the demand for houses, flats, and bungalows before turning to the limited supply of adapted properties and relative oversupply of accommodation restricted to older people.
- 3.51 Interviewees from local authorities, RSLs, and stakeholder organisations agreed that the demand for houses exceeds the demand for flats. Particularly strong demand was reported for houses with access to a garden which were often reserved for families with children. Among flats, many interviewees stated that ground floor and accessible flats are in the highest demand and basement flats in least demand. The demand for bungalows was seen to vary by area. Some local authorities observed that people who are interested in downsizing from larger flats or houses often state a strong preference for a bungalow. In some instances, this potential for downsizing to free up larger properties is encouraging local authorities to develop new bungalows. In other areas, however, bungalows are no longer seen as a development priority due to a lack of available land and concerns that bungalows are a less effective use of land when compared to higher-density housing options such as flats and houses.
- 3.52 As discussed in section 3.27-29, there is a shortage of adapted properties available across most of Wales for disabled people. In addition, the teams within local authorities which adapt properties were also described as lacking resources and staff. Interviewees also raised that there is a lack of high-quality data in most local authorities on the existing adaptations of properties and the potential adaptability of properties.
- 3.53 Finally, interviewees expressed differing views on the supply of supported accommodation. Local authorities generally stated that they have a shortage of supported accommodation with some local authorities stating that their shortage is severe. Some local authorities and RSLs described ongoing development projects to meet the demand for supported accommodation. In addition, some interviewees described the instability in Welsh Government funding for supported accommodation which is often "announced at the last minute" as a key factor in

limiting their ability to make long-term and somewhat irreversible financial investments, such as employing more staff or increasing pay.

Location

- Interviewees indicated that the demand for properties also varies by location. Many local authorities and RSL interviewees stated that properties in rural areas are in less demand than those in urban areas. The explanatory factor raised by interviewees was that rural properties tend to be more distant from social services, support networks, shopping facilities, educational settings, and employment opportunities. This is exacerbated where rural properties are poorly connected to public transport routes. In addition, interviewees raised that local connection requirements can force a reduction of demand for rural properties. This was seen to apply particularly in local authorities with policies which require a longstanding connection to a community, sometimes as narrow as a ward, rather than the full local authority area.
- 3.55 Interviewees indicated that the combination of limited access to services and local connection requirements means that rural properties are more likely than urban properties to be allocated to individuals in lower bands or a lower level of priority on registers. Rural properties are also more likely to be left void for long periods of time. Some RSLs stated that rural properties with limited demand are sometimes used for temporary accommodation instead.
- An additional challenge was identified in local authorities with uneven geographical demand. For example, across north Wales, social housing in urban areas along the northern coast was repeatedly identified as facing more demand than rural housing in the southern half of counties. Many local authorities described certain towns or areas as facing more demand than other parts of the local authority area. Local authority interviewees noted that access to services especially public transport and work opportunities and perceptions of an area's desirability were key factors in determining their relative demand. However, overall, local authorities and RSLs operating in urban or semi-urban areas stated that they have almost no "hard to let" properties since the dramatic increase in demand following the COVID-19 pandemic.

Increasing stock

3.57 An ongoing Local Government and Housing Committee inquiry has published evidence on the challenges faced in the development of new social housing

properties across Wales.⁴⁰ Additionally, interviewees from local authorities, RSLs, and stakeholder organisations also discussed their perceptions of the severe challenges inhibiting sufficient levels of new social housing. Key findings from stakeholders interviewed for this research are summarised below:

- Land availability. Limited land availability in urban and semi-urban areas was
 raised as a challenge, with the potential for releasing land held by public
 sector bodies seen as a way of increasing land use for social housing in
 some areas.
- Planning permissions. Difficulties receiving planning permission for developments were noted, especially for large new developments and developments of one-bedroom properties for people experiencing homelessness.
- Risk of voids. While this challenge has reduced significantly due to the high
 demand for social housing, risk of voids remains for properties with specific
 adaptations or very large properties with many bedrooms in specific local
 areas. To mitigate this concern, some RSLs and local authorities suggested
 designing new properties in a way where two neighbouring properties could
 be combined into one larger property, or where walls could be removed or
 added to change the number of bedrooms.
- Financial challenges. Some RSLs stated that certain developments can be cost-ineffective, especially the developments of one-bedroom flats or very large properties. They stated that increasing and reforming the Social Housing Grant could mitigate these challenges.

⁴⁰ Senedd Cymru, 'Social housing supply - responses to the consultation'. Available at: Consultation display.

4. Social housing allocations and local partnerships

Overview of social housing allocations

- 4.1 As part of the data collection exercise, local authorities were asked to provide the number of social housing units which were allocated to households during the 2023 calendar year⁴¹. Providing data on allocations appears to be more difficult for some local authorities compared to providing data on the housing register, with 3 of the 16 local authorities which returned data templates being unable to provide any data on allocations due to not holding the information themselves (e.g., the housing association holds this data), or it being too labour intensive to provide.
- 4.2 It is worth reiterating that as with all administrative data, there will be variations between how data is processed, managed and updated within each local authority. Three local authorities could not provide any data relating to social housing allocations, and an additional three local authorities could not accurately provide breakdowns on all homelessness duties, for example only reporting aggregated numbers on Section 66 and 73 allocations, or only reporting all allocations owed a homelessness duty as Section 75. While there may be small inconsistencies with how homelessness duties are reported, the data still demonstrates general trends regarding where households owed duties are being allocated social housing at higher rates.
- 4.3 Using the number of allocations provided by local authorities and official statistics on social housing stock data from StatsWales⁴², the allocation rates per 1000 units of social housing stock have been calculated as shown in Table 3 and Table 4. Note that some of these allocations may refer to the same property being allocated multiple times. By geographic area classification, Table 3 shows that rural local authorities have the highest allocation rate of 80.6, indicating that 80.6 households are allocated social housing for every 1000 units. Comparatively, local authorities in the Valleys have the lowest allocation rates, with approximately 54 households being allocated for every 1000 units.

Table 3. Allocation rates per 1,000 units of social housing stock – Rural-urban classification⁴³

Local Authority Type

Allocation Rate per 1,000 units of social housing stock

⁴¹ Note that two local authorities could only provide allocations data for the 2023/2024 financial year.

⁴² Welsh Government(n.d), 'Social housing stock and rents'. Available at: Social housing stock and rents.

⁴³ StatsWales (2008), 'Rural Wales – definitions and how to choose between them'. Available at: <u>Rural Wales:</u> definitions and how to choose between them | GOV.WALES

Rural	80.6	
Other	63.7	
Urban	63.0	
Valley	54.1	

Source: Analysis by Alma Economics from primary social housing data collected from 13 Welsh Local Authorities

4.4 Allocation rates for stock-holding local authorities are notably higher than local authorities that are not stock-holding and rely solely on RSLs for allocations, as shown in Table 4. It is worth noting that this is not due to stock-holding local authorities having a higher supply of social housing stock (as they have both local authority stock and RSL stock available), as the allocation rates refer to allocations to their own stock and not to total supply social housing supply. As such, stock-holding local authorities have an allocation rate of 80.7 households for every 1000 units of stock, while local authorities without stock have a lower allocation rate of 56.8 households for every 1000 units.

Table 4. Allocation rates to all households per 1,000 units of social housing stock – Stock holding vs non-stock holding local authorities.

Local Authority Type	Allocation Rate per 1,000 units of social housing
Stockholding	80.7
Non-stockholding	56.8

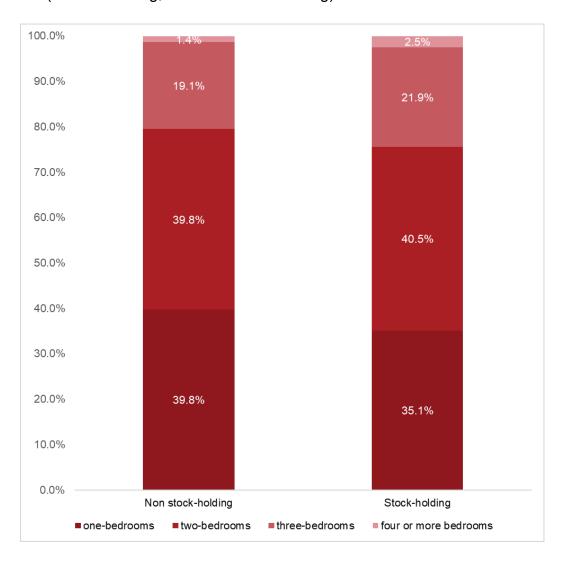
Source: Analysis by Alma Economics from primary social housing data collected from 13 Welsh Local Authorities.

Allocations by number of bedrooms

4.5 Though stock-holding local authorities tend to have higher allocation rates, as shown in Table 4, this does not necessarily mean that local authorities with their own stock are more capable of addressing pressure points in housing demand. One-bedroom properties are in significant demand and a higher proportion of these properties are allocated in local authorities without social housing stock (39.8% of total allocations) compared to stock-holding local authorities (35.1% of total allocations), as shown below in Figure 6. Note that the sample represented in Figure 6 is further reduced from 13 (3 of which did not provide allocations data) to 12, as one local authority could not break down allocations data by number of bedrooms.

Figure 6. Proportion of total allocations by number of bedrooms (stock-holding vs non-stockholding)

Social housing allocations across 12 local authorities compared by stock-holding status (6 stock holding, 6 are not stock-holding)



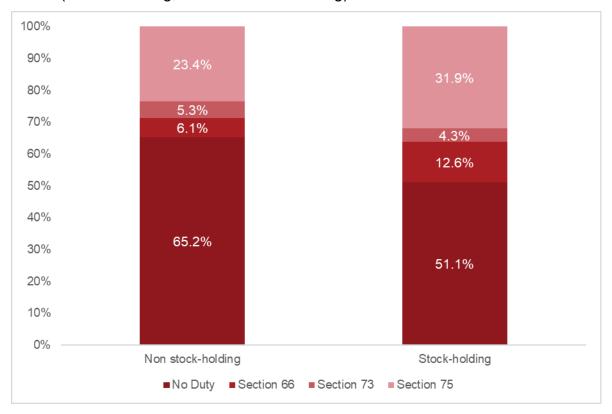
Source: Analysis by Alma Economics from primary social housing data collected from Welsh Local Authorities.

Allocations for households experiencing or at-risk of homelessness

4.6 Allocation rates for households owed statutory duties vary between stockholding and non-stockholding local authorities, otherwise known as local authorities who rely solely on RSLs for allocations. As shown in Figure 7, non-stock-holding local authorities allocate a larger proportion of social housing to households that are not owed a statutory duty (65.2%), compared to local authorities with their own housing stock (51.1%).

Figure 7. Allocation rates by duty type for stock-holding and non-stock holding local authorities

Social housing allocations across 13 local authorities compared by stock-holding status (6 stock holding, 7 are not stock-holding)



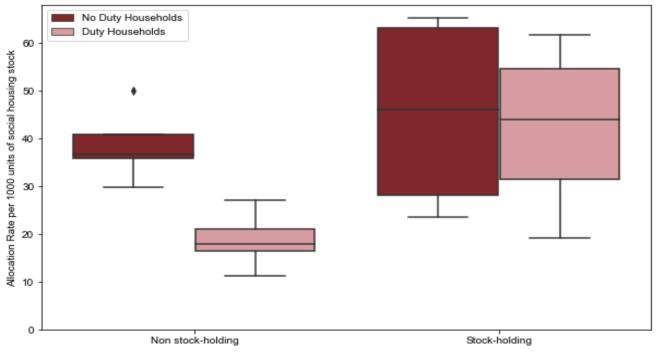
Source: Analysis by Alma Economics from primary social housing data collected from Welsh Local Authorities.

- 4.7 Stock-holding local authorities notably allocate a higher proportion of social housing to households owed a Section 66 or Section 75 duty (12.6% and 31.9% respectively) compared to local authorities without housing stock. This higher proportion is further demonstrated in Figure 8, where stock-holding local authorities have a higher median allocation rate for households owed and not owed a duty, compared to local authorities which are not stock-holding and therefore rely on RSLs.
- 4.8 It is important to note that while stock-holding local authorities tend to have higher allocation rates overall, there is large variation among the allocation rates of stock-holding local authorities. This is shown in Figure 8 where stock-holding allocation rates have a wider interquartile range (represented by the box) compared to non-stockholding local authorities, where the variability is much smaller (as depicted by a narrower interquartile range, represented by the box). The overlap between these interquartile ranges suggests that the allocation rates of stock-holding and non-stockholding local authorities should not be analysed in isolation. The variation within stockholding and non-stockholding allocation rates and this project's

qualitative findings – suggests there are many factors that create a successful allocation system. This includes relationships with key stakeholders (including RSLs), or individualised allocation processes. This is further explored in the next section.

Figure 8. Allocation rates by duty type for stock-holding and non-stock holding local authorities⁴⁴

The distribution (see footnote) of social housing allocations across 13 local authorities (6 stock-holding, 7 non-stockholding)



Source: Analysis by Alma Economics from primary social housing data collected from Welsh Local Authorities.

4.9 Allocations for households owed statutory duties also vary by rural and urban classification, as shown in Figure 9. There is a higher proportion of social housing allocations for households owed a duty in urban and rural local authorities compared to local authorities categorised as valley or other⁴⁵. This is particularly

43

⁴⁴ **How do you interpret a box plot?** A box plot visually summarises the distribution of a dataset. In the case with Figure 8, this is a representation of the distribution of social housing allocations by (i) stock holding vs non-stockholding local authorities, and (ii) allocations to households with and without statutory duties. The "box" part represents the Interquartile Range (IQR), representing the 25th percentile (bottom of the box), 50th percentile or median (line in the middle of the box), and 75th percentile (top of the box) of the dataset. The box represents where majority of the data is. The lines on either end of the box (known as the "whiskers") show the

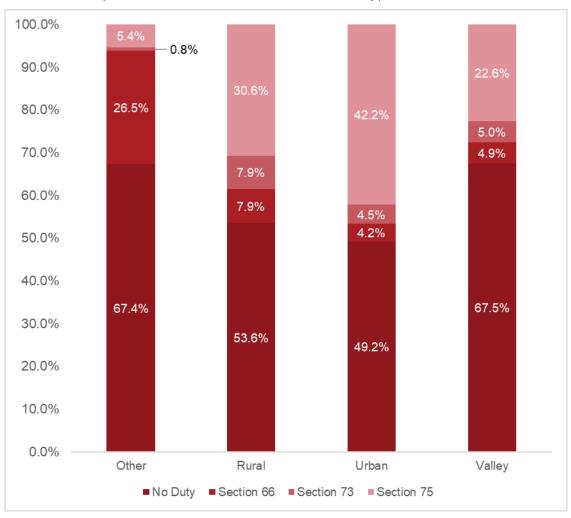
range of the data (absolute maximum or minimum values), and any dots (as seen for allocations to households without a duty in non-stock holding areas), are outliers that represent unusually high or low data points.

45 StatsWales (2008), 'Rural Wales – definitions and how to choose between them'. Available at: Rural Wales: definitions and how to choose between them | GOV.WALES

notable for urban local authorities which have a lower allocation rate per 1000 units compared to rural areas, as shown in Table 3.

Figure 9. Allocation rates by duty type by rural-urban classification of local authorities

Social housing allocations across 13 local authorities compared by rural-urban classification (2 Other, 5 Rural, 3 Urban and 3 Valley)



Source: Analysis by Alma Economics from primary social housing data collected from Welsh Local Authorities.

Local allocations systems and policies

Relationships between local partners

4.10 In interviews, local authorities, RSLs, and stakeholder organisations all voiced strong agreement on the importance of maintaining close and collaborative relationships. One stakeholder organisation described strong and improving partnerships as "one of, if not the, most important factors that is going to unlock everybody pulling together and acting with shared purpose." These relationships were currently viewed as positive across a majority of local authority areas. Regular

communication and meetings at various levels of seniority, from senior executives to frontline staff, were identified as important facilitators of constructive relationships. In strong cases, both strategic and operational meetings are held, along with regular panel meetings to discuss individual cases. In some instances, interviewees explained that local authority or RSL staff regularly work in each other's offices to enhance communication. Examples such as the strong communication and "mini-reviews" among partners in Monmouthshire as well as exceptionally well-structured and open meetings in Torfaen exemplify best practices.

- 4.11 RSLs reportedly find it easiest to navigate these relationships where there is a clear point of contact within respective local authorities, for example through dedicated liaison posts which exist in several local authorities already. Some interviewees outlined their perception that local relationships were sometimes closer where a smaller number of RSLs were involved, or where fewer RSLs held a large share of local stock. Direct communication channels, such as shared Microsoft Teams platforms, are used in some areas to facilitate quick exchanges.
- 4.12 Despite the generally positive outlook, challenges due to diverging objectives and business models were noted by local authorities as well as RSLs. Local authorities have a duty to prevent or relieve homelessness and bear the costs of temporary accommodation, while RSLs do not. This was seen to lead to occasional disagreements and a lack of urgency in implementing some projects to relieve temporary accommodation costs. In the words of one local authority interviewee, "I think it comes down to [the fact that] local authorities are the ones with homelessness duties and responsibilities. RSLs will try and help with those, but ultimately they are not the ones who are bearing the massive temporary accommodation cost." Managing such diverging priorities and financial pressures was observed as particularly challenging in areas where local authorities do not own properties and therefore lack control or flexibility. Disagreements can reportedly arise over RSL use of local lettings and sensitive lets policies. Specifically, some local authorities called for greater accountability from RSLs in their role of assisting authorities in discharging their Section 73 and 75 duties, despite cautioning against obliging RSLs to house certain households due to the risk of forcing ill-judged allocations on RSLs and the potential negative impact of forced allocations on the relationships between local authorities and RSLs. Other issues noted by individual RSL interviewees were rare instances of long delays of up to two years with

- registering new applicants and frustrations when systems are reviewed or changed without engagement with RSLs.
- 4.13 Good practices identified by a large number of local authority and RSL interviewees included maintaining open dialogue and joint decision-making on suitable allocations, as well as conducting open pre-tenancy conversations which were seen to reduce cherry-picking and improve tenancy success. Processes were also found to be smoother where local authorities have dedicated teams or personnel for administering the housing register or to manage direct relationships with RSLs. A stakeholder organisation suggested that creating a nationwide forum where local authorities can share best practices on how to strengthen partnerships with RSLs would be welcome.
- 4.14 When discussing strategic decision-making or changes to local policymaking (e.g., with reference to the common allocation policy), RSLs appreciated being involved and consulted as equal partners. Some RSLs felt included in Local Housing Market Assessments (LHMAs). In some cases, RSLs developed common allocation policies with input and veto power from the local authority, rather than the other way around. Good practice examples were identified in the Single Access Route to Housing (SARTH)⁴⁶ system and partnership in north Wales, where RSLs and councils collaboratively draw up development plans.
- 4.15 Stakeholder organisations emphasised that they could contribute valuable advice, especially on common allocation policies if involved more closely in local strategic decision-making. Interviewed stakeholder organisations also noted that local systems often depend too much on personalities and personal relationships. Positive signs were identified by several organisations in the success of SARTH and the continuing commitment to Common Housing Registers by all partners across local authorities. However, interviewees noted improvement potential when creating forums to share best practices between local authorities and RSLs. For example, it was suggested that the Welsh Government relationship manager model should encourage open discussions on challenges between all stakeholders, actively involving RSLs and other stakeholders.

Housing Association.

⁴⁶ The Single Access Route to Housing (SARTH) is a partnership between 6 RSLs and 3 local authorities in north Wales, which seeks to allocate social housing in a consistent, shared, and transparent way. Its members are Conwy Council, Denbighshire County Council, Flintshire County Council, Cartrefi Conwy, Adra, Grŵp Cynefin, North Wales Housing Association, Wales and West Housing Association, and Clwyd Alyn

Local authorities with Common Housing Registers

- 4.16 19 of 22 local authority areas reported operating their allocations system through a Common Housing Register (CHR). CHRs were widely seen to be an effective tool by both local authorities and RSLs. In the majority of local authority areas, RSLs could access the CHR and associated IT systems directly, enabling them to establish their own shortlists of eligible applicants at the click of a button. This direct access was seen as positive and time-efficient. Most systems recorded offers as soon as they were made to avoid duplication. In choice-based systems, RSLs handled shortlisting based on bids received, adhering to applicant order on respective registers.
- 4.17 Interviewees explained that cleaning the register was a common practice among most local authorities and is conducted typically at intervals ranging from 6 to 18 months. This involved contacting people to check if they were still seeking housing or to check if their banding or household size had changed. This ensured that shortlists were accurate, which was seen as crucial for shortlists to work effectively. RSLs typically paid local authorities to access and use the register.
- 4.18 Good practice examples highlighted by interviewees included SARTH, which was seen to work well and was liked by RSLs for its clear processes and consistency. Rhondda Cynon Taf was also noted for its transparency and smooth processes, appreciated by RSLs. Monmouthshire's Homesearch⁴⁷ used automation and data cleaning for its digital system, which makes it another example of good practice example for the effective running of a CHR.
- 4.19 However, several examples were highlighted where housing registers were not accessible to all partners but instead were held by the local authority or, in a few cases, several partners separately. In such systems, local authorities most frequently sent individual nominations directly to RSLs via email. RSLs expressed concerns that despite the existence of a housing register, partners were not granted access, and argued that this does not foster a sense of true partnership. In some cases, RSLs explained that they received only names and contact details of applicants and routinely had to request additional information, causing delays and leading to allocations of accommodation that may not be suitable for the applicant. In at least one case, this led an RSL to advertise social housing properties on a

⁴⁷ Monmouthshire Homesearch online portal. See Monmouthshire Homesearch - Home.

commercial house search platform online. In several other cases, RSLs chose not to sign up to the register for cost reasons.

Local authority areas without a Common Housing Register

- 4.20 In the three local authority areas without CHRs, various local models and structures were explained by interviewees. In one instance of a stock transfer area, an RSL interviewed holds its own register. This system was seen to operate similarly to housing registers in other local authorities people applied, underwent eligibility checks, and received a housing needs assessment. While the local authority reportedly does not have direct access to the RSL's online system, regular data sharing takes place, with plans to institutionalise this further.
- 4.21 Another local system involved several RSLs maintaining their own respective lists alongside the local authority's own separate list. Other RSLs without lists operating in the local authority area received direct nominations from the local authority. In this system, the local authority had a 50 percent nomination right with some RSLs furthermore, in new estates the local authority at times nominated 100 percent of incoming tenants. If needed, RSLs would return to the local authority to request new names if the initially chosen applicant rejected the property, was rejected by the RSL, or had already been housed. This model required applicants to apply to different lists separately. This system was seen to be prone to duplication, and some RSLs criticised it for being burdensome for applicants. When advertising properties, some RSLs not using CHRs stressed that they experienced extremely high demand and expressed a preference for a uniform Wales-wide housing register system.
- 4.22 One local authority that chose not to implement a CHR explained this decision with their preference to hold its own list. They explained that this approach was seen to allow the local authority to monitor nominations more easily and track allocations made by RSLs in detail. Concerns were also raised about the cost and time required to transfer to a CHR. RSLs explained that the lack of a Common Housing Register may necessitate people registering multiple times with different providers (including the local authority and local RSLs), which complicated the application process for people in need while also distorting data and the extent of housing need.

- Additional features of local allocation systems
- 4.23 Local authorities have implemented a range of additional policies or practices, either as part of their common allocation policy or through other local structures, which do not directly form part of the CHR administration discussed above.
- 4.24 Local connection requirements: Local connection requirements vary widely among local authorities. They often include criteria such as current or previous residence, family support, and employment. These requirements may cover the entire local authority area or be restricted to a small number of regions or even wards within the local authority, particularly in rural areas. According to interviewees, local connection requirements are often welcomed or required by local politicians such as councillors. Homelessness charities, however, cautioned that strict local connection requirements may prevent allocations to people experiencing homelessness or restrict the choice of those seeking to move away from areas associated with past trauma.
- 4.25 Points-based systems: Several local authorities use points-based systems that enable ranking applicants on a cumulative basis and in needs-based order. Varying levels of points are allocated for factors such as medical need, overcrowding, local connection, and waiting times, with some exceptions for refugees and survivors of domestic abuse. These systems aim to prioritise applicants based on their specific circumstances and housing needs. Some RSLs cautioned that points-based systems carry the risk of "points chasing" where applicants seek to gather points to improve their chances of being housed quickly by deliberately worsening their housing conditions. In other cases, some RSLs noted that points-based systems can disadvantage people who do not understand them well as they may not understand the system and therefore lose 'points' by not inputting relevant information or using the required terminology.
- 4.26 Quotas: Quotas are among the most common additional policies, often setting soft or hard targets on the share of allocations to applicants in certain bands on the register. While in some local authorities this focuses on ensuring a certain share up to 100 percent is allocated to homeless applicants, in other local authorities this is used to provide realistic opportunities for those lower down on the list (e.g., by allocating 10-20 percent to lower bands on the register). Quotas are not always

fixed and can change over time or to react to the local authority's needs. For example, changes in quotas have occurred during the COVID-19 pandemic or to address hospital bed blocking. Other local authorities not using quotas follow the order on the register strictly from the top.

- 4.27 Emergency allocations and direct nominations for homelessness: According to RSLs and local authorities, emergency allocations and direct nominations are useful tools to achieve personalised matches for people in immediate need. The use of the terms "emergency allocations" and "direct nominations" varies across local authority areas with overlapping processes and motivations. The process describes the placements of individuals or households in need into a vacant property without waiting for the applicant to reach the top of the register or waiting list or, in some cases, not even having been added to the housing register yet. This is especially relevant where applicants within bands are sorted by date order, meaning that even the most urgent newly added cases will be ranked below households in the same band but who have waited for a longer time to be allocated a property. The approach was also seen as preventing individuals in immediate need from having to bid for multiple properties in choice-based systems or from having to sign up for several waiting lists in local authorities without a Common Housing Register.⁴⁸ In most local authorities using this system, direct nominations are used to ensure that people experiencing homelessness can be rehoused rapidly. This reduces waiting times and eases the demand on housing registers. In some local authorities, interviewees explained that direct nominations allow certain applicants' cases to be prioritised over homeless applicants. Prioritised cases include victims of crime, county lines, cuckooing, and survivors of domestic abuse. These exceptions ensure that the most vulnerable individuals receive timely and appropriate housing support.
- 4.28 Management transfers: Management transfers denote a household being offered to move to a different property held by a local partner without re-entering the register or waiting list. These transfers are seen as useful tools for preventing homelessness and are motivated by issues such as property defects, anti-social behaviour, overcrowding, domestic violence, flooding, or engineering works. Management transfers sometimes follow quotas (e.g., up to 10 percent of lettings for RSLs), and often require strict reporting to the local authority. Local authorities and RSLs express mixed views on management transfers, emphasising it as a useful tool in

⁴⁸ Note that this does not affect the housing register data presented throughout this report as only the housing register from the local authority is provided if there is not a Common Housing Register.

cases where quick reactions are necessary and adding tenants back on the register would be too slow (e.g., in cases of serious property defects). However, local authorities expressed frequent concerns over the perceived risks of using management transfers to give preferential treatment to certain current tenants, while applicants still waiting on the register may be disadvantaged.

- 4.29 Local lettings policies and sensitive lets: Local lettings policies are estate- or street-specific policies that the groups of tenants eligible for the properties in an area. Local lettings policies are most frequently used in cases of new developments with local authorities and RSLs highlighting the importance of creating sustainable communities and encouraging a mix of ages, household sizes, and needs. For example, local lettings policies often give preferential treatment to households wanting to downsize in order to free up larger family properties elsewhere. The policy would also often consider the availability of local services such as GPs, schools, and supermarkets as well as commissioned support services (e.g., mental health support, substance use treatment).
- 4.30 Sensitive lets usually apply to a specific property only (house, flat, etc.), in contrast to local lettings policies encompassing several units or a small local area. Once a property becomes vacant and is marked as a sensitive let, this will restrict who can be allocated the property as a new tenant. Reasons for why sensitive lets are put in place include previous burdens on neighbours through anti-social behaviour or to ensure a safe environment for incoming tenants who may have been victims of domestic violence or have multiple support needs. According to interviewees, all sensitive lets have to be agreed between the local authority and, subject to who the landlord for the property is, the respective RSL.
- 4.31 Further policy differences: Further differences between local systems were noted throughout the research which merit attention. This includes differences in how extra bedrooms are allocated by different RSLs and whether applicants can even apply for extra bedrooms. Some RSLs offer more flexibility in providing additional bedrooms based on specific needs and circumstances which also manifests itself in differences in affordability assessments for prospective tenants.
- 4.32 In a small number of local authorities, policies relating to pets allowed in social housing properties were discussed. In a majority of local authorities, pets (except e.g., service dogs) are not usually allowed in social housing properties. However, in other areas, interviewees explained that tenants' emotional attachment to pets is considered in the local system. Nevertheless, whether pets are accepted or not

reportedly differs between different local housing providers even within the same local area, causing uncertainty for tenants. While some RSLs may not allow pets at all, other RSLs operating in the same area may allow pets as long as properties have separate entrances.

Choice in allocations

- 4.33 The levels of choice for applicants to social housing vary between fully choicebased lettings systems and other methods of offering choice to tenants.
- 4.34 Choice for tenants: In several local authorities, tenants are given some choice over number of bedrooms (up to one more than their household size, subject to affordability) and the type of the property (house, maisonette, flat, bungalows usually only for age 55+). Other elements of choice at times include gardens and parking options. Levels of location choice can vary across local authority area, with some allowing tenants to choose specific wards or areas within the local authority. Applicants experiencing homelessness are typically asked to select multiple areas to increase their chances of being housed.
- 4.35 Choice-based lettings: Choice-based lettings denote systems for allocating social housing that allow applicants to choose and bid on vacant properties, which are advertised through various platforms by the local authority or RSL. Applicants are then shortlisted based on need, and properties are usually offered to those with the highest priority who bid on them. Some restrictions may apply locally on how many houses can be bid on per week as well as eligibility criteria for bidding. Auto-bid (automatic bidding) options are often applied in applicants' selected areas and for applicants experiencing homelessness. Choice-based lettings are seen by some local authorities as working well, meanwhile others report negative experiences and disadvantages.
- 4.36 Discussions of benefits of choice-based lettings included:
 - Tenants can see where they finished on the shortlist for properties they bid for, providing a better indication of available stock and realistic offers.
 - Some RSLs reported that it was more effective to contact people who have bid recently, as the process keeps their information up-to-date and reduces unresponsiveness to offers.
 - Effective for low-demand properties, resulting in fewer refusals since people have actively bid for these properties.

- 4.37 Stakeholder organisations noted that while bidding can seem demotivating to applicants waiting to be housed, it does allow for a more person-centred approach, offering people more control over their housing options.
- 4.38 Reports of downsides of choice-based lettings included:
 - Some RSLs reported higher refusal rates since applicants were understood to have better visibility of alternatives and stock quality.
 - Choice-based lettings systems are seen as more costly to administer.
 - RSLs and local authorities also raised concerns about digital literacy and access to the internet for applicants in temporary accommodation.
 - Further risks mentioned included the concentration of complex tenants in certain areas due to a process of self-selection, which was seen as possibly exacerbating social divides.
- 4.39 Stakeholder organisations participating in the research noted the paradox of "choice" in choice-based systems. Homeless households were understood as under pressure to accept any property offered to them after having automatic bids placed on any available property of a suitable size and location. Instead, some RSLs argue that targeted direct nominations work better for sensitive cases, rather than using a choice-based approach with auto bids. Other learnings from RSLs include the need for more detailed information on accessibility in choice-based systems, as even small differences such as the number of steps to a front door can significantly impact suitability for tenants with mobility issues.

Refusals from tenants and rejections from landlords for social housing allocations

Reasons for tenants refusing allocations

4.40 Some local authority interviewees and RSLs reported having observed an increase in rejections from applicants who have been offered a property and outlined a number of reasons for this. Applicants were understood to frequently reject offers if they want to live in specific streets or housing estates within their selected areas of preference, for example due to family and friends living nearby. Other reasons include applicants rejecting older properties being offered to them instead of new stock from either the local authority or RSLs.

- 4.41 Interviewees noted separate rules being applied to different applicant groups and by local authority with regard to the consequences their refusal has on their position on the register. Depending on the local authority area, different numbers of reasonable offers can be refused, most often one refusal for applicants experiencing homelessness and two refusals for other applicants with a housing need. If exceeding this number of refusals, applicants may then be downgraded to a lower band on the housing register and the refusal may be recorded as the authority's homelessness duty having been discharged.
- 4.42 Discussing future approaches to this challenge, some interviewees set out their current approach of contacting successful applicants before making any formal allocation to ensure that applicants are still interested in the property before making a formal offer or allocation.
 - Reasons for rejecting applicants
- 4.43 All local authorities and RSLs addressed whether and under what circumstance applicants got passed over ("skipped") once reaching the top of the shortlists for vacant properties or, depending on the local authority's policy, having been nominated for a property. A majority of interviewees directly addressed concerns around "cherry-picking", described as eligible priority applicants being passed over for other applicants further down on the register or shortlist, for example due to the highest ranked applicant's support needs or a record of anti-social behaviour or rent arrears.
- 4.44 Local authorities frequently raised such a skipping of eligible applicants as a relevant topic of discussion between local partners. However, only a minority of local authority interviewees described it as a problem or challenge. In some cases, local authorities explicitly stated that no instances of "cherry-picking" were known. Where problems with skipped applicants were identified, local authority interviewees most frequently pointed to observations that RSLs were more likely to skip applicants experiencing homelessness, most frequently single people with multiple support needs or a record of previous anti-social behaviour or rent arrears. Examples of mutually agreed "bypassing" were noted by local authorities, especially where an adapted property becomes available and a household or person further down on the applicant list would be an ideal fit for the property. In this case, local partners tend to discuss this allocation jointly and allocate it to the person in need of adapted housing.

- 4.45 All RSLs participating in the research emphasised that no eligible applicant would be skipped without a clear and substantial reason, frequently pointing to decisions made in the interest of the applicant themselves or seeking to create sustainable local communities around the vacant property. RSLs emphasised that they are committed to house applicants regardless of their background or history, meanwhile also highlighting that the right fit needed to be found, especially for applicants with multiple support needs. Allocating an applicant with multiple support needs into a housing estate with a high number of other tenants with support needs was described by some as "setting them up to fail". This was seen as a particular challenge, considering that one-bedroom flats are often clustered and a majority of tenants with multiple support needs are single people. Instead, RSL interviewees emphasised the importance and frequency of open discussions on individual cases, either within RSL teams or with the local authority. RSLs unanimously stressed that they sought to maximise tenancy success rates and sustainable communities. RSLs therefore tried to avoid concentrating support needs in one area or community unless sufficient support services were made available for all new and existing tenants. Considering the higher prevalence of support needs among people experiencing homelessness (see section 4.26), interviewees frequently observed that this led to a reduction in the allocation rate to homeless households.
- When discussing reasons for rejecting applicants, RSLs most frequently explained that rejections were usually made when the proposed accommodation is unsuitable for the applicant, perhaps due to it lacking the necessary adaptations or not being adaptable. RSLs described cases where applicants had already been housed but were still listed on the register and were therefore rejected by RSLs. In other cases, RSLs stated that household sizes may have grown or decreased since registering, leading RSLs to reject their application and instead search for a different suitable property for the household in question. Citing other reasons specific to applicants' history, RSLs also emphasised that they would reject allocating properties in the same area to the victim and perpetrator of past acts of domestic violence, instead seeking to house individuals further apart. This suggests that outdated Common Housing Registers are a source of some rejections by RSLs.
- 4.47 A large majority of both RSLs and local authorities noted that reasons for skipping applicants had to be recorded without exceptions, either through an online system or via email. Local variations were noted in the extent to which this data was analysed or audited, with good practice being identified in the SARTH system with

its dedicated compliance officer. In addition, the level of detail required to explain the rationale for skipping an applicant was noted to vary significantly between local authorities. An independent review of skipped applicants was seen as crucial to ensure a fair and accountable allocation of social housing, but also to protect the partnership relations between local authorities and RSLs by conducting the audit externally. It should also be noted that a small number of local authorities reported that they did not record the skipping of applicants or that there was no internal capacity to monitor those, even where reasons were recorded.

- 4.48 When discussing reasons and perceptions of skipped eligible applicants, RSLs and local authorities alike noted several challenges, subject to local policies and structures. In a small number of cases, local authorities explained that once an RSL property became vacant, they would only send the name and contact details of the first household or person on the shortlist to RSLs. If that first nomination was refused by the applicant or rejected by the RSL, the RSL would then return to the local authority and request a second nomination. This approach was seen by RSLs as slowing down the process and making it more difficult for them to obtain information about the applicant, therefore making it harder to assess whether an allocation would be suitable. Several RSLs also discussed their views of a lack of flexibility in local systems – examples included cases where a vacant property would be an ideal fit for an applicant one or several places further down the waiting list. In contrast, by following current policy, both applicants would likely be allocated less suitable properties. Further challenges were identified in local authority areas with only a small number of RSLs, where it was noted that once an applicant had already experienced past issues with all RSLs with local stock, all local housing providers may object to housing the individual or household again, therefore resulting in large amounts of time spent in temporary accommodation instead. Similar challenges were identified in small communities where the risk of biased decision-making by housing officers with personal ties or knowledge of applicants was raised.
- 4.49 Across interviews, a number of learnings for all involved local partners were identified. Several local authorities encouraged RSLs to speak with housing support officers before rejecting any shortlisted applicant. Further lessons surrounded the need for detailed notes on all properties e.g., number of steps to an entrance.
- 4.50 RSLs also called upon local authorities to more proactively consider and share other details such as shared entrances, corridors and common spaces when

allocating applicants with previous records of anti-social behaviour, previous criminal convictions, or a history of domestic violence offences. In consequence, RSLs explained that they prioritised allocating such applicants into properties which did not share any common spaces with other vulnerable tenants.

Promoting tenancy sustainability

- 4.51 Local authorities and RSLs implemented various measures to promote tenancy sustainability and support vulnerable tenants, differing by local policy and structures. General measures included convening panels with local partners to discuss individual cases, commissioning support workers, offering "floating support", and establishing payment plans for tenants in arrears. These proactive strategies aim to prevent homelessness by identifying and managing potential issues before they escalate. In some instances, arrears are written off to prevent tenants from spending long times in temporary accommodation. A small number of local authority interviewees stated that they have also established dedicated anti-social behaviour units to address specific instances. RSLs often explained during interviews that their core motivation is to establish long-term tenancies and sustainable communities, leading them to express concerns about clustering tenants with multiple support needs in the same housing estates, particularly in housing blocks consisting of single-person accommodation. This objective was echoed by several stakeholder organisations during interviews who explained the importance of matching people in need of social housing with the right properties, rather than creating feelings of obligation to accept any options offered to them. Overall, despite numerous challenges, both local authorities and RSLs reported very few evictions. Interviewees from local authorities and RSLs expressed a strong aversion to evicting people from social housing, recognising that evictions are traumatic experiences for tenants. Should evicted tenants return to social housing waiting lists, it would be anticipated that they would have greater support needs due to the trauma of eviction and potential resulting homelessness. This is why one local authority interviewee described eviction as "the last resort".
- 4.52 Local authority interviewees also noted several unintended consequences of the current approach to allocations with effects on tenancy sustainability. Stock-holding local authorities explained that if RSLs bypass a significant number of challenging cases, these tenants are more likely to move into local authority properties, exacerbating clustering issues there instead. Co-locating individuals with substance use issues, for example, can lead to multiple tenancy failures, offsetting the benefits

of another successful allocation. RSLs additionally pointed out that not relocating tenants who are accruing arrears but require smaller properties may result in them returning to the housing register. This complicates their chances of being allocated a different property due to their arrears, further perpetuating the cycle of poor housing outcomes which was seen to be preventable through management transfers or direct allocations.

- 4.53 Where existing challenges were known about specific local areas (e.g., frequent issues with anti-social behaviour or substance use), some local authority interviewees stated their belief that applicants should still be offered available properties in those areas. Such conversations would be had with applicants while ensuring that they could decline such properties without this being counted as a refusal and thus impacting their standing on waiting lists. Some local authorities explained that offering applicants an informed choice was preferable over an approach of rejecting applicants straight away due to local risks such as anti-social behaviour or substance use issues, subject to their own prior history or health conditions.
- 4.54 A strong majority of RSLs instead argued that to achieve sustainable tenancies, tenancy support needed to be reviewed and extended, especially as more people with multiple support needs or no prior experience of independent living are allocated social housing. Looking forward, some interviewees also noted the potential for introducing quotas more widely as a means to create more mixed and sustainable communities.

Successes, challenges and best practice in current local systems Pillars of success across current local allocation systems

- 5.1 Interviewees across local authorities, RSLs, and stakeholder organisations discussed several successes and benefits of current policies, stakeholder relationships, and effective ways of meeting the needs of vulnerable people.
- 5.2 Effective prioritisation of service provision: Local authorities and RSLs both emphasised that service provision for people in need was at the centre of their work. Local authority interviewees tended to outline that – within the constraints of the severe lack of stock - the system worked well for homeless clients in temporary accommodation due to their prioritisation through banding rules. Interviewees also highlighted successes where individuals were given real choice over where to live. This approach led to better outcomes and a more needs-based, trauma-informed method of support. Collaboration with external agencies, such as mental health services or occupational therapists for assessing accessibility, further improved tenancy outcomes for vulnerable groups. Transparency in policies and waiting list status were noted as beneficial for applicants. When discussing good practice examples, interviewees noted that the effective and transparent use of Common Housing Registers, where all partners have equal access to information (such as in Rhondda Cynon Taf and the SARTH partnership), resulted in smooth operations and trusting partnerships. In addition, local authorities with a direct and emergency allocations policy for applicants experiencing homelessness reported those to be functioning well.
- 5.3 Partnership working: The relationship between local authorities and RSLs was described as a key pillar of local success in some local authorities. The relationships were often characterised by effective communication and resource sharing, including IT and legal advice. Interviewees praised constructive conversations about finding the right fit for people, particularly through Specialist Housing Panels. RSLs also pointed out that not having to wait for names and contact details to be shared individually by local authorities sped up the allocation process. Clear commitments to invest in partnerships, such as regular meetings and local authority officials occasionally working from the offices of RSLs, also seemed to be effective.
- 5.4 Innovative IT systems: Modern and functional IT systems with regular updates were seen to reduce errors and expedite allocation processes. The SARTH system was

identified as an example of good practice, allowing extensive sharing of data insights among partners which served to increase efficiency. Features highlighted by some local authorities and a majority of RSLs were the automatic generation of shortlists and the availability of data on applicants online which were seen to improve efficiency and the quality of allocations. RSLs also emphasised that all partners should have access to such a shared IT system, including several members of each RSL team and smaller RSLs.

- 5.5 Features of Common Housing Registers and Common Allocation Policies: Local authority and RSL interviewees pointed to successes where choice-based systems provided increased transparency around available properties and saved time when contacting people. Interviewees stated their views that this helped to manage applicants' expectations of the housing stock and waiting times. Further successes were identified in places with quota systems, allocating specified shares of available housing to different groups in need. This was seen to increase flexibility and achieve sustainable, mixed communities of tenants. Torfaen and Monmouthshire were highlighted as examples of good practice due to their well-functioning local systems.
- 5.6 Stock levels for some property types: While social housing stock was described as far lower than demand across Wales, there were specific property types in which stock levels matched demand more closely. Several RSLs and local authorities identified sufficient availability of two- or three-bedroom homes for families in most areas. Additionally, a good supply of older person's accommodation and sheltered housing was identified across several local authority areas. Property developments were seen to progress well in several areas, facilitated by regular collaboration with RSL development teams. Local authorities, RSLs, and stakeholder organisations also pointed to effective empty homes teams which provide support to identify and improve empty homes to convert them into social housing.
- 5.7 Stakeholder organisations emphasised that RSLs play a crucial role in managing community sustainability, which is key to developing and selling surrounding properties, fostering confidence in these initiatives. Innovative collaboration with private sector developers, as seen in Cardiff and Swansea, where housing development is treated as a strategic priority within the authority, further demonstrated good practice in the sector.

Elements of local allocation systems presenting current challenges

- 5.8 Meeting needs: When discussing challenges, local authorities and RSLs most frequently pointed to their limited ability to support people in need of social housing. All interviewees unanimously noted a severe mismatch between supply and demand, with a particular lack of one-bedroom flats and large properties of four bedrooms and above. The under-occupancy charge was identified by some interviewees as exacerbating these issues, as many local authorities reportedly lacked the flexibility to offer larger properties to households in urgent need. Stakeholder organisations echoed these concerns and highlighted the potential trauma suffered by those rejected for social housing, given their frequent traumatic backgrounds and prolonged time on waiting lists, which often led to outdated needs assessments. Organisations raised further concerns over insufficient investment in support services, noting that effective support services were vital for ensuring sustainable tenancies.
- 5.9 Meeting expectations: Meeting applicants' and tenants' expectations was another significant challenge. Interviewees from both local authorities and RSLs felt that applicant expectations had risen in recent years, with tenants often expressing stringent preferences or rejecting properties which are not new builds or specific locations. Interviewees explained that this led applicants to sometimes wait for long stretches of time for their ideal property, blocking temporary accommodation space. The choice-based system, while designed to provide transparency and choice, was seen as often leading to unrealistic expectations and was not seen as suitable given the housing crisis and effective lack of choice.
- 5.10 Administrative challenges: Administrative challenges were also raised across all participating stakeholders. RSLs highlighted the high cost of contacting people if they did not respond. This was a particular challenge where the Common Housing Register was outdated and where local authorities were short-staffed. RSLs also raised additional costs occurred where local authorities did not offer sufficient support to applicants throughout the sign-up process. In a few cases, RSLs explained that applicants occasionally approached local RSLs for support despite not living in their properties. RSLs argued that such support should be provided by the local authority instead. Further administrative challenges were identified in areas

⁴⁹ As mentioned previously, a caveat with our research is the fact that all data collected is using administrative data from local authorities. There will be variations between how local authorities manage, process and update their data.

where adapted property lists were held separately or were not sufficiently visible to RSLs. According to interviewees, adaptations often had to be removed at a high cost if no suitable match was found, further complicating the process. Future administrative challenges were foreseen in cases of high costs incurred by local authorities and RSLs for modern IT systems. Instead, interviewees explained that reverting back to previous, less functional systems was a likely course of action to save costs.

- Challenges faced by local authorities: Local authorities discussed several frequent challenges, most frequently the lack of responsiveness from applicants to offers of housing, leading to delays in the allocation process. Local authorities saw this problem as being related to a lack of transparency regarding people's position on waiting lists over time. Whilst the majority of local authorities did not suggest "cherry-picking" to be an issue in their area, for the minority of local authorities that did raise concerns this was seen as exacerbating the pressures on their existing stock. Discussing unintended consequences of current structures, local authorities also noted concerns that homelessness may be seen as a quicker path into an allocation, therefore increasing pressure on allocation systems further. Other unintended consequences were identified from lacking flexibility following complete stock transfers (i.e., non-stockholding authorities) and perceived impacts of the Renting Homes (Wales) Act.
- 5.12 Challenges faced by RSLs: While often agreeing with local authorities, RSLs also reported a set of their own specific challenges. A substantial minority of RSLs raised concerns regarding insufficient risk information on applicants is relayed by local authorities and that such information is frequently provided too late in the process. This was seen to inhibit or slow down the allocation of the most suitable and longterm allocations. These concerns were significantly less prevalent in areas with regular and effective meetings between local authorities and RSLs. Possible solutions were identified in the sharing of local authority 'risk registers' and more regular or standardised meeting structures between local authorities and RSLs, providing a systematic structure across different local authorities and encompassing both strategic and operational meetings. Additionally, when seeking to place a larger number of homeless individuals in the same local areas, RSLs raised concerns that not enough support is provided to develop tenancy-management skills of tenants during their time in temporary accommodation, which could act to prevent tenancy management issues following an allocation and reduce strain on

social housing partnerships in the long-term. Most RSLs also raised a lack of support services once tenants moved in, although a White Paper proposal for a duty to support the retention of accommodation may improve support across partnerships. Similarly motivated by creating sustainable local communities, RSLs raised that quotas (where existent) for management transfers were too low. Further concerns were raised by some RSLs regarding the internal procedures of a small number of local authorities, including bureaucratic delays or long decision-making times, as well as internal conflicts, e.g., between the local authority's planning and housing teams.

- 5.13 Additional challenges mentioned by stakeholder organisations included:
 - Homelessness charities reported that caseworkers struggled with different local authority systems, and arrears were at times used as a reason not to house people, which the charities called to change through local policy changes and training of staff.
 - Organisations emphasised the importance of a better explanation of applicants' and tenants' rights, including their ability to request reviews of inappropriate allocations.
 - 5.14 Rural areas were found to face additional shortages due to the prevalence of second homes and short-term lets in some areas promising higher returns for landlords and therefore further reducing the supply of long-term private rental accommodation.

Future changes and upcoming challenges

- 5.15 Interviewees were also asked to discuss their views on any upcoming challenges with regard to local allocations systems, changes in demand for social housing, applicants' and tenants' needs, as well as wider factors. Interviewees raised several medium and long-term challenges, including:
 - Many local authorities and RSLs argued that the lack of supply of social housing constituted the key long-term challenge – with significant financial and political investments required at local and national levels.
 - Some local authorities stated that political pressure on housing development plans sometimes exacerbates the mismatch between supply and demand for certain groups or property types. Interviewees raised examples where sheltered accommodation for older people was given a preference at the

- expense of the development of general needs housing where a more significant shortage was identified.
- Some local authorities raised concerns regarding an ageing population which may increase the demand for sheltered accommodation and support services in the medium and longer term.
- Many RSLs and some local authorities argued that private sector landlords leaving the market is a concern. This was seen to likely increase private rental sector rents and evictions in the short term, further increasing pressure on the social housing sector and temporary accommodation. A further factor was identified where people would be unable to afford private sector rents or to move on from social housing into a private let. The causes of these perceived changes in the private rental sector were identified as increased interest rates, higher energy costs, and the perception that private sector landlords are leaving the market following the implementation of the Renting Homes (Wales) Act.
- Some interviewees raised concerns regarding delays in the development of new housing caused by difficulties obtaining planning permission. Related concerns were voiced where housing development was halted due to concerns regarding housing development increasing phosphate levels in local water systems.⁵⁰ Such delays in developments were noted as having reduced housing supply in some local authorities, for example Monmouthshire, Ceredigion, and parts of Powys where development was paused on many sites due to concerns over phosphates. External shocks such as increased material costs and workforce shortages were also identified as having affected the development of all housing.
- Several interviewees furthermore chose to discuss challenges identified in the proposals from the Welsh Government's Ending Homelessness White Paper. Points of discussion frequently focused on reinforcing the additional preference within allocation systems for people currently experiencing homelessness:
- Many local authorities and some RSL interviewees feared that substantially increasing the proportion of allocations to people experiencing

⁵⁰ More information available here: <u>Natural Resources Wales / Advice to planning authorities for planning applications affecting nutrient sensitive river Special Areas of Conservation</u>.

homelessness would incentivise people to falsely present to local authorities as homeless. Furthermore, some interviewees raised concerns that reducing allocations to people who are not homeless but have a serious housing need (e.g. overcrowding) would eventually result in more people becoming homeless as their housing situation worsens.

- Some local authority and RSL interviewees were concerned that creating an additional preference for people experiencing homelessness may have unintended consequences for other groups including disabled people and people living in overcrowded, damp, or otherwise unsuitable housing. In particular, local authority interviewees voiced concerns that the effectiveness of existing strong partnership arrangements may be reduced if stock is directed elsewhere and quick allocations to certain groups cannot be made. In the words of one local authority official in an area which claims to have effective local partnerships and allocation rates, "it's so important we still have local policy and provision in place [...] rather than try to apply a one-size-fits-all approach because we all face very different challenges based on the people presenting and the stock we have."
- A few local authority and RSL interviewees expressed concern that an additional preference for homeless applicants would reduce allocation rates for people downsizing and therefore reduce the overall capacity of social housing stock.

5.16 Other concerns with the White Paper proposals included:

- Some local authority interviewees raised concerns that they will not be able to "require RSLs to rehouse statutory homeless referrals" as proposed in the White Paper. This concern was raised where an RSL rather than the local authority directly manages the CHR, when allocations are made from an automatically produced shortlist, and where local authorities lack the capacity to investigate the justifications provided for refusals.
- A local authority without a Common Housing Register expressed concern that adopting one would be expensive and time-consuming and would prevent the local authority from effectively monitoring how RSLs accept allocations to homeless households.

 A concern that the White Paper's proposal to extend a tenant's right to request a review of the suitability of accommodation may further increase pressure on local authority teams and demand for allocations.

Outlook on future policy changes and sector developments

5.17 The following section focuses on upcoming policy developments, local policy updates, and changes in the structure of a small number of RSLs. The discussion also includes reflections on progress with Rapid Rehousing and its early or anticipated impacts, impending policy changes, and the potential for mergers between RSLs.

Rapid Rehousing

- 5.18 Local authority and RSL interviewees were asked to describe their progress towards implementing the principles of Rapid Rehousing in their local operations. While some local authorities stated that Rapid Rehousing has had no direct impact on allocation processes yet, most local authorities indicated that moving towards the approach has had wider changes. Local authorities and RSLs identified an intangible yet crucial impact of Rapid Rehousing namely, encouraging a favourable political environment for changes to local allocation policies. Some interviewees described how Rapid Rehousing was an important contextual factor when encouraging local elected representatives and officials to reform allocation policies with the goal of reducing time spent in temporary accommodation.
- In addition to this, some local authority interviewees described recruiting new staff dedicated to implementing Rapid Rehousing, including the recruitment of business development officers and Rapid Rehousing Managers (using funding provided by the Welsh Government). Finally, some local authorities indicated that Rapid Rehousing has changed how they collect and use data. For example, one local authority reported having created a "Rapid Rehousing register", another was creating a new "Rapid Rehousing data dashboard", and a third local authority was collecting and using more data on the needs and backgrounds of people using homelessness services to inform the local authority-wide housing strategy.
- 5.20 Interviewees also discussed the challenges associated with implementing Rapid Rehousing. First and foremost, many RSLs and local authorities discussed their view of the immense challenge of implementing Rapid Rehousing's principles due to the severe lack of social housing stock. Stakeholder organisations echoed the severe challenge of undersupply to implementing Rapid Rehousing, with one

arguing that "there is probably not a more difficult time to try and do Rapid Rehousing than now because of COVID-19, the housing market, and the numbers that we have in temporary accommodation". They reiterated that Rapid Rehousing is a crucial opportunity to build upon the collaboration between RSLs and local authorities to get "everybody in"⁵¹ during the pandemic, "rather than just revert to how things were before". Stakeholder organisations also raised concerns regarding a lack of consistency between local authorities over the development and implementation of plans, and local political support for Rapid Rehousing's principles. This was echoed by a small minority of local authority officials, who stated that they lack support from local elected officials to increase the proportion of allocations to homeless households to the required extent to implement the principles of Rapid Rehousing. These interviewees believed that increasing allocations to people experiencing homeless is necessary in order to fully implement a Rapid Rehousing approach and related schemes such as Housing First.

In addition, some interviewees raised further specific challenges regarding the implementation of Rapid Rehousing. Local authority interviewees indicated that RSLs can vary in their adoption of Rapid Rehousing principles. Many local authorities stated that RSLs work in genuine partnership to deliver Rapid Rehousing principles and comply with a high rate of allocations to homeless households. However, some local authorities expressed greater challenges and noted that some RSLs continue to expect "tenancy-ready" nominations – meaning people with the financial stability and skills to maintain a tenancy with limited support. RSLs and stakeholder organisations argued that increased support services for incoming tenants under Rapid Rehousing could prevent these challenges from arising, as this would reassure RSLs that all tenants have the appropriate support services to maintain a social housing tenancy. The White Paper's proposal for local housing authorities to have a duty to support a tenant to retain their accommodation after an allocation has been made may change this in future.

Anticipated local policy changes

5.22 When asked if they were anticipating changes to their local allocation policies, most local authorities stated that they were awaiting clarity on the proposals of the White Paper before making changes. In some local authorities, however, changes to local

⁵¹ Welsh Government, Written Statement: COVID-19 Response – Homelessness and Rough Sleepers. Available at: Written Statement: COVID-19 Response – Homelessness and Rough Sleepers (20 March 2020) | GOV.WALES.

allocation policies were being discussed or in the process of implementation. Varying widely by area, changes included moving away from choice-based lettings and towards allocations based directly on waiting lists, strengthening the requirements for local connections by moving from open to closed registers, encouraging the "flipping" of temporary accommodation units into permanent accommodation, and creating a direct nominations scheme for homeless applicants. Other local authorities were focusing on formally incorporating aspects of emergency policies introduced during the COVID-19 pandemic. Some local authorities stated their allocation policy would become more aligned with the principles of Rapid Rehousing, such as by increasing allocations to homeless households.

5.23 The role of RSLs in informing changes in local allocation policies reportedly varied from area to area. Some RSLs stated that they were already highly involved in the development of updated allocation policies, while others voiced concerns that they are not consulted adequately on changes. Furthermore, stakeholder organisations – especially those working with people with lived experience of homelessness – stated that they are rarely asked for their input when changes to local allocation policies are made. They called on local authorities to consult a wider range of stakeholders before committing to local policy changes, especially to consider the views of commissioned support providers with knowledge of the lived experience of applicants and tenants.

Reflections on RSL mergers

- 5.24 RSLs and local authorities discussed upcoming and ongoing mergers between different social landlords across Wales. Interviewees emphasised that this was a relevant area of focus, given the impact on service provision to tenants, relationships with local authorities, and administrative good practice identified throughout such mergers.
- 5.25 One current process is the ongoing merger between Linc and Pobl which, interviewed RSLs pointed out, is motivated by their operations in similar local authority areas. While still in the early stages of the merger, the process aims to unite services as soon as possible to prevent offering different support levels within the same region by the same overarching organisation. Plans include fully integrating management systems to streamline operations and enhance service delivery as a direct benefit of the merger.

- 5.26 Newport City Homes' merger with Melin represents another relevant development. This merger, set to be completed by April 2025, will reportedly result in a new name for the combined entity and expand its operations to cover five local authorities. The merger was described as a complete integration process, necessitating the unification of policies and processes and motivated through financial efficiencies and leveraging the robust IT systems of one organisation. Currently, allocations were explained as working differently across both organisations, and interviewees pointed to remaining tasks with aligning IT systems, finances, customer service, and staff work arrangements. Several interviewees highlighted that preserving local knowledge within any newly formed organisation should be prioritised.
- 5.27 Other RSLs and local authorities also discussed further previous RSL mergers and highlighted the challenges of integrating diverse management or IT systems and operational hurdles. According to interviewees, mergers would at times result in RSLs managing very diverse property portfolios, which could complicate standardisation of maintenance and service consistency.

Best practice and recommendations

- 5.28 Interviewees across RSLs, local authorities, and stakeholder organisations were asked to identify examples of good or best practice, either in current local systems across Wales or beyond.
- 5.29 Close collaboration to meet the needs of vulnerable groups: Interviewees identified the close collaboration between different support services, RSLs, and the local authority as vital. Providing robust support services was deemed crucial for tenancy success, particularly in new developments, with interviewees emphasising the need for early intervention mechanisms and support services tailored to multiple support needs. Examples included actively involving support workers before and after allocations are made, offering sustained mental health support, and involving occupational therapists to ensure adequate accessibility measures are in place. Several instances of good practice were identified. For example, Caerphilly organised meetings between support workers when tenants moved from temporary accommodation to social housing, ensuring continuity of care. Denbighshire successfully collaborated with social care teams, adopting a multidisciplinary approach involving substance use support and occupational therapists, which benefited both tenants and staff. Blaenau Gwent profiled every property to provide a register which includes exact accessibility details and adaptation potential.

- 5.30 Trauma-informed approach to social housing allocations: Local authorities, RSLs, and stakeholder organisations highlighted the importance of awareness around the trauma applicants face, whether in previous stages of their lives or during prolonged periods of homelessness. A trauma-informed approach was therefore identified as crucial best practice. In some cases, RSLs lease properties to local authorities to house a household in temporary accommodation but – at an appropriate time – these properties are "flipped" into long-term social tenancies without the tenant(s) having to leave, thereby preventing the need for tenants to move again and reestablish support networks. One RSL in Cardiff also worked with a trauma-informed consultant for 18 months to improve their internal approach. Interviewees furthermore stressed that offering real choice to applicants would enable a more trauma-informed approach. This could be achieved through choice-based lettings policies, with the caveat that an increased number of properties would need to be available to enable effective choices. A further suggestion included planning new social housing properties in a way that facilitates alterations of the floorplan, for example to increase or decrease the number of rooms without requiring the household to re-enter the register and move.
- 5.31 Supporting groups with protected characteristics: When discussing service provision for groups with protected characteristics, some organisations recommended separate allocation and housing schemes for certain groups to achieve higher tenancy sustainability rates. Avenues raised by representatives for how to tailor provision to individual groups included shared accommodation options, suggesting two individuals as tenants without a joint rental agreement. Interviewees raised a lack of data on the allocation and tenancy sustainability rates for groups sharing protected characteristics. As an example of good practice, the RSL Wales & West produces regular reports on the allocation shares to groups with protected characteristics and how well their needs were met.
- 5.32 Management structures and IT systems: Improvements to management structures and IT systems were also highlighted. Interviewees identified shared, well-functioning IT systems as cases of best practice. According to RSLs, such systems should allow access by all local partners and several staff members, in addition to introducing instant messaging channels like Microsoft Teams to foster trust in partnerships. Other helpful IT features implemented in some local authority areas already included the automatic compilation of reports of all applicants who had been skipped, as well as the reasons recorded for decisions. Some interviewees

recommended adopting a system similar to SARTH, for example across all of southeast Wales. This was seen to carry the potential to increase efficiency, transparency, and foster trust in local partnerships.

- 5.33 Further areas of best practice were identified as follows:
 - Proactive sharing of best practice among local authorities, among RSLs, as well
 as across partners and by involving stakeholder organisations.
 - Interviewees emphasised that Housing First worked well when a traumainformed approach and wrap-around services were provided, achieving high levels of tenancy success.
 - A small number of interviewees also referenced an approach used in Scotland which involves passing applicant details to RSLs for them to identify suitable properties directly.
 - One stakeholder organisation emphasised that tenants should be consulted in any research and policy changes on an ongoing basis. This would enable a more holistic view of needs and preferences going forward.
 - Continuing and strengthening Welsh Government schemes (e.g. the Transitional Accommodation Capital Funding Programme and the Empty Homes Grant Scheme) which support the conversion of empty homes into social housing was also recommended.
 - Encouraging direct collaboration between local authorities, RSLs, and private landlords was seen as bearing future potential. An extended rollout of the Leasing Scheme Wales scheme could attract more private landlords into the sector.
- 5.34 There is further opportunity to research social housing in Wales, including a comparative analysis between local authorities with higher and lower growth rates of social housing demand (as indicated through number of households on the housing register), to understand the possible drivers of this increase and how it may change in the future. Possible drivers could include (i) migration within Wales from rural to urban areas due to economic factors such as employment or (ii) changes in the number of asylum seekers due to external conflicts such as those displaced from Ukraine. In addition, further analysis could be done on changes to stock and how this affects allocation rates, including turnover, vacancy rates, and building of new stock.

6. Data quality challenges and opportunities

Using data for decision-making

- 6.1 Local authorities, RSLs, and stakeholder organisations recognised the importance of using data to inform decision-making on social housing allocations and development of new properties. According to interviewees, allocation policies are primarily informed by a combination of legal duties, the data on waiting times for different groups, and political priorities. Data reports using Common Housing Registers were the most frequently used form of data to inform allocation policies. Some local authorities and RSLs argued that the use of data could be strengthened when determining allocation policies at a local and national level.
- Interviewees stated that plans for future housing developments, including the development of social housing, are primarily informed by Local Housing Market Assessments (LHMAs) and reflected in Local Development Plans (LDPs). An example of good practice in some local authorities, such as Conwy County Borough Council, 52 was noted in the creation of a 'prospectus' targeted at RSLs. Such documents are intended to share information on the demand for social housing developments by area, property size, and property type, informed by quantitative data from the housing register, homelessness data, and LHMAs.
- Interviewees representing stakeholder organisations from the wider housing sector called for greater triangulation of the quantitative data on homelessness, Common Housing Registers, and the housing market to inform development plans and allocation policies. In addition, interviewees called for more qualitative data to be used when developing allocation policies to ensure the perspective of applicants and tenants is incorporated. Interviewees expected that this would facilitate a person-centred approach to allocations.

Challenges in data collection and sharing

6.4 Effective data sharing is another crucial aspect of relationships between local authorities and RSLs. Interviewees explained that data can be used to identify high-demand areas and inform the mix of new developments (e.g., property sizes most in demand). Several interviewees identified innovative data collection systems for homelessness data, housing registers, housing size, management transfers, and support needs in temporary accommodation. Some homelessness organisations

⁵² Conwy County Borough Council (2023), 'Local Housing Prospectus'. Available at: <u>Conwy Local Housing</u> Prospectus - Conwy County Borough Council

also highlighted that they collect additional data on individuals and their journeys. RSLs explained that they collect varying amounts of data, and the level of data sharing with local authorities varies widely, from non-existent to comprehensive. Examples of shared data include move-on trajectories, waiting time overviews, and programming waiting list calculators for future applicants as a rough indication. Additionally, equity, diversity, and inclusion data and satisfaction metrics are collected in some instances. RSLs identify their largest concern in cases of insufficient risk information and data sharing on applicants' history before allocations are made.

- 6.5 Through the data collection exercise, data on the housing register and allocations had high completion rates, with nearly 100% of the sample providing aggregate figures on the number of households on the housing register and total number of allocations. There is extremely limited data on both offers and nominations, where about half of the sample (8 local authorities) provided offers data, and only one provided information on nominations despite other local authorities citing that they had nomination agreements with RSLs. Note that a key caveat with this data collection exercise is that all analysis is based on administrative data from local authorities. The inherent nature of administrative data means there will be variations between how local authorities process, manage and update this data, and this will likely change data quality and interpretation between local authorities, which further iterates why improving these processes and management systems is recommended.
- While social housing data appeared to be relatively accessible for local authorities at the aggregate level for both the housing register and allocations, major challenges arise when attempting to break down data by any household characteristics. Many local authorities cited that this would require manual review of applications of which local authorities were either unable or unwilling to do due to time and resource constraints. In addition, data is often limited to the main applicant, meaning that socio-demographic characteristics of household members are not captured which results in skewed data, for example an overrepresentation of certain characteristics that are more likely to be the main applicant (e.g., females). There are also discrepancies between what is and isn't collected for sociodemographic data across local authorities, for example not all local authorities ask about sexuality or employment. Where data is collected but not mandatory, many applicants either opt out or put "prefer not to say", resulting in further gaps of socio-

demographic details on social housing applicants. Local authorities are also unable to provide historical data on the housing register or allocations and can only provide a "snapshot" of the database as it currently stands. Historical data can therefore only be provided if a snapshot of the database was pulled at a specific period.

Opportunities to address data quality concerns and gaps

- 6.7 Standardised data collection practices and a more integrated approach to data management across local authorities and RSLs are essential to improve decision making and overall understanding of social housing demand. Opportunities for improvements to data practices include:
 - Standardisation of data collection: Establishing uniform guidelines for collecting and reporting socio-demographic characteristics to ensure there aren't inconsistencies across local authorities or housing associations. This includes practical elements around data
 - Leveraging better database management systems: To enhance the
 usefulness of available data, investing in improved management systems
 where data could be pulled automatically to analyse specific sub-groups,
 needs or periods of time.
 - Improved data sharing mechanisms: Developing more effective data-sharing protocols between local authorities and RSLs to ensure key information on applicants including histories and risk profiles are used effectively during the allocations process.
 - Transparent data practices: Transparency in data collection and management practices is key to ensure trust between all stakeholders, applicants and the wider public and inspire confidence that housing decisions are made reliably and comprehensively.

7. Conclusions

- 7.1 This report explored how social housing allocations are made across Wales using a mixed-methods research approach. It included a primary data collection exercise with local authorities regarding their housing registers, nominations, allocations, and offers to social housing applicants. It also included in-depth qualitative interviews with all Welsh local authorities, 17 RSLs, and 10 stakeholder organisations.
- 7.2 Our quantitative data collection found that social housing demand has increased by 16% since 2022/2023. This increase is particularly pronounced in stock-holding local authorities and in rural local authorities⁵³. Increased demand has resulted in extended wait times for social housing and greater reliance on temporary accommodation. Interviews with local authorities, RSLs, and stakeholder organisations echoed this while also highlighting increased number of applicants with multiple support needs. Some interviewees described how waiting times for a social housing allocation have increased from a few weeks and months before the pandemic to up to two years.
- 7.3 Our primary data collection found that allocation rates vary significantly across Wales, suggesting that caution should be used when using this data. Nonetheless, stock-holding local authorities generally demonstrated higher allocation rates than non-stock-holding authorities. There are limitations for all data analysis collected, including that the data is administrative and will vary between local authorities in terms of how data is processed, managed, and updated.
- 7.4 Interviewees identified a severe shortage of social housing stock, especially of one-bedroom properties. Our quantitative findings found that one-bedroom properties constitute over 50% of demand on housing registers across Wales, with the shortfall being most severe in rural regions where they make up 59% of housing register demand. Interviewees highlighted that experiencing homelessness is over-represented among single applicants, meaning that the shortage of one-bedroom properties affects people experiencing homelessness severely. This increases local authority expenditure on temporary accommodation, and according to stakeholder organisations long periods in temporary accommodation are highly stressful and intensify support needs. In addition, the lack of three and four-bedroom properties, particularly in urban areas where they make up 20% of demand, has also led to

⁵³ StatsWales (2008), 'Rural Wales – definitions and how to choose between them'. Available at: <u>Rural Wales:</u> definitions and how to choose between them | GOV.WALES

overcrowding. Some interviewees described overcrowding in social housing as a "hidden crisis" and identified the under-occupancy charge as exacerbating overcrowding.

- 7.5 The limitations of certain types of stock has an enormous impact on the allocations which can be made. According to some interviewees, the lack of social housing stock with severe shortages of one-bedroom and larger properties has resulted in an allocation system which means that it is the availability of certain stock which primarily determines when and whether people are allocated properties from social housing waiting lists, not reasonable preferences or local allocation policies. To quote a local authority, "a lot of focus ends up on banding and how the hierarchy of the banding looks, but what actually drives preference is how long it takes somebody to be re-housed, and that is driven by the availability of property."
- 7.6 All groups of interviewees that being local authorities, RSLs, and stakeholder organisations strongly agreed on the central importance of maintaining close and collaborative relationships between local authorities and RSLs. In interviews, it was the local authorities who could elaborate on the ways they prioritise and invest in their relationships with RSLs who tended to state they face less pressure on their waiting lists. They also tended to say they have more timely and quicker allocations and effective remedies to crises. This report therefore included best practices for strengthening partnerships, including recommending convening local authorities to discuss their best practice in strengthening partnerships with RSLs.
- 7.7 Interviewees recognised the risk of RSLs unreasonably rejecting some applicants (often sometimes referred to as "cherry-picking"), however only a minority of local authority interviewees described it as a challenge in their authority and some local authorities explicitly stated that no instances of "cherry-picking" took place in their area. Large local variation in the degree of detail required by local authorities to justify bypassing was identified. The report therefore recommended efforts to strengthen the consistency of data reporting on applicant rejections including more systematised reporting of reasons for rejections and independent reviews of skipped applicants. Interviews also found that RSLs and some local authorities are concerned by the lack of support services offered by local authorities to maintain tenancies, especially considering housing officers are reporting an intensification in required support needs of applicants since the pandemic. A lack of support services promotes caution among some RSLs about allocating multiple people with multiple

- support needs in one community, which they described can be perceived by local authorities as "cherry-picking".
- 7.8 The review also found inconsistent data collection, sharing and management between local authorities and RSLs hinders best practice and effective decision-making. There are major data gaps regarding available information on sociodemographic characteristics of households, or the ability to review historical data. Improvements can be made through standardisation of data collection, enhanced database management and improved data-sharing mechanisms.

8. Annex A: Overview of stakeholder engagement

Type of stakeholder	Role
Welsh Government (Scoping) ⁵⁴	Relationship Manager
Welsh Government (Scoping)	Relationship Manager
Welsh Government (Scoping)	Relationship Manager
Welsh Government (Scoping)	Relationship Manager
Stakeholder organisation (Scoping)	Community Housing Cymru (CHC)
Stakeholder (Scoping)	Bec Woolley, independent consultant ⁵⁵
Local authority	Anglesey
Local authority	Blaenau Gwent
Local authority	Bridgend
Local authority	Caerphilly
Local authority	Cardiff
Local authority	Carmarthenshire
Local authority	Ceredigion
Local authority	Conwy
Local authority	Denbighshire
Local authority	Flintshire
Local authority	Merthyr Tydfil
Local authority	Monmouthshire
Local authority	Gwynedd
Local authority	Newport
Local authority	Pembrokeshire
Local authority	Neath Port Talbot
Local authority	Powys
Local authority	Swansea
Local authority	Rhondda Cynon Taf
Local authority	Torfaen
Local authority	Vale of Glamorgan
Local authority	Wrexham

⁵⁴ Scoping interviews were used to identify research priorities and establish an understanding of the sector. Scoping interviews were not thematically analysed unlike other stakeholder interviews.

⁵⁵ Bec Woolley (2023), 'Allocations: Understanding more, in the context of homelessness in Wales'. Available at: White Paper on ending homelessness in Wales | GOV.WALES.

RSL	Barcud
RSL	Bron Afon
RSL	Cadwyn Housing Association
RSL	Cartrefi Conwy
RSL	Coastal Housing
RSL	Grŵp Cynefin
RSL	Hafod
RSL	Linc Cymru
RSL	Melin Homes
RSL	Monmouthshire Housing Association
RSL	Newport City Homes
RSL	Newydd Housing Association
RSL	North Wales Housing
RSL	Pobl
RSL	Tai Tarian
RSL	United Welsh
RSL	Wales and West Housing
Stakeholder organisation	Community Housing Cymru
Stakeholder organisation	Crisis Cymru
Stakeholder organisation	Cymorth Cymru
Stakeholder organisation	Home Builders Federation
Stakeholder organisation	Llamau / End Youth Homelessness Cymru
Stakeholder organisation	National Residential Landlords Association Wales
Stakeholder organisation	Shelter Cymru
Stakeholder organisation	Tai Pawb
Stakeholder organisation	TPAS Cymru
Stakeholder organisation	Welsh Local Government Association

Annex B: Local authority discussion guide

Warm-up

- 1. To get started, could you describe in just a few words your role and day-to-day activities within your local authority?
 - Prompt: Which other teams within the LA do you work closely with when it comes to allocations?

Allocations systems in local authority

- 2. To what extent is your local authority currently able to meet the needs of groups with reasonable preferences applying for social housing (e.g. those at risk of homelessness or homeless, key workers, single people, families, etc.)?
 - Prompt: Are there any barriers for homeless households and households threatened with homelessness to access social housing?
 - Prompt: Are you aware of how many people are currently on the register, how many of those are experiencing homelessness, and how many may not have a housing need at all?
 - Prompt: What is the average waiting time for people on the Common Housing Register (or equivalent)? How does the waiting time differ between different groups of people (e.g. single vs families)?
 - [If referencing anti-social behaviour or rent arrears] Prompt: How do local authorities address these challenges with anti-social behaviour and/or rent arrears?
 - Prompt: Do you work together with homelessness services on allocations of social housing in [local authority]?
 - Prompt: Do you have a sense of whether your local authority can meet the needs
 of those with additional or complex needs? Do you work with other services with
 your local authority to ensure support is aligned with accommodation? (e.g. with
 social services, mental health teams, etc.)
- 3. How does the available social housing stock compare to current housing needs in [local authority]?
 - Prompt: Does this differ by accommodation or property type?
 - Prompt: Does it depend on household composition/size or characteristics?
 - Prompt: Could you tell us a bit more about the housing stock you hold as a local authority?
 - Prompt: How does the number and type of housing stock you hold influence your ability make allocations?
- 4. Which groups or conditions are currently seen as a priority for the allocation of social housing currently work in [local authority]? (e.g. local connection)

- Prompt: Could you tell us what data currently guides your decision-making on allocations?
- Prompt: [If no Common Housing Register] How does prioritisation and allocation work given you work differently than local authorities with a Common Housing Register?
- [If applicable] Prompt: How is the Common Housing Register list managed in practice? Is it up to date, how does it get cleaned, who should be included/taken off?
- Prompt: What degree of choice is given to prospective tenants within the local authorities you work closely with?
- [If part of SARTH] Could you tell us more about how your local system works as part of the SARTH partnership?
- 5. How do you work together with respective RSLs in your local authority?
 - Prompt: Which RSLs do you work with? How would you describe your relationship with each of them in a few words?
 - New prompt: How do RSLs access nominations?
 - Prompt: Are you informed about why RSLs may reject individuals? Do they have to give a reason?
 - Prompt: Is there currently a process in place to discuss individual cases and why
 they have been refused an allocation between you and RSLs?
 - Prompt: Does the difference between nomination rate and allocation differ across RSLs in your LA?
 - Prompt: Could you tell us more about the extent to which RSLs take nominations on and other cases where they might not?
- 6. [If applicable] Could you give me an overview of your progress with Rapid Rehousing to date? How does/will data collection differ under Rapid Rehousing, compared to previously?
 - Prompt: Has the transition to Rapid Rehousing altered the way you allocate properties? Are RSLs engaged and understanding of Rapid Rehousing and its aims?
- 7. Are there any upcoming social housing allocation policy changes planned in [local authority]?
 - Prompt: How are strategic decisions made, especially regarding the (mis-)match between current housing need and available stock?
 - Prompt: How does this impact the building and/or acquisition of new properties by the local authority or social landlords?

Overarching questions

- 8. To what extent does the current allocations system work well for you?

 Prompt: Which groups does the allocations system currently work well for?
- 9. What parts of the current allocations system present challenges to you, RSLs, or tenants?
 - Prompt: Which stage of the allocation process is most prone to challenges within your LA?
 - Prompt: What barriers are likely to be encountered with regards to the quality and availability of social housing allocations?
 - Prompt: What approaches are being taken to account for individuals with complex needs?
 - [If applicable] Prompt: To what extent does rurality present an additional challenge for your system?
 - Prompt: Are there any other bottlenecks in your LA which we haven't discussed yet?
 - Prompt: Do you anticipate any other future challenges?
- 10. Are there any helpful learnings from you'd like to share from within your local authority when seeking to support sustainable tenancies for all household types?

Data collection template

- 11. Will it be possible for you to provide us with (most of) this data?
- 12. Do you have any questions about the template?
 - Prompt: Would you like to schedule another call to discuss the data collection template in more detail or is there anything else we can support you with in the process of filling it in?
- 13. What are key challenges faced by your local authority with gathering data and processing data into a suitable format?
- 14. Is there any additional data you'd recommend us to approach RSLs about?

Debrief

- 15. Are there any other issues that you would like to discuss that we have not asked you about?
- 16. Would it be possible for you to put us in contact with someone at the RSL(s) within your local authority? Given GDPR concerns, it would be highly valuable if you could check whether they would be happy for their contact details to be passed onto us and whether we can contact them for an interview.

Annex C: RSL discussion guide

Warm-up

- 1. To get started, could you describe in just a few words your role and day-to-day activities within [RSL Name]?
 - Prompt: Which teams in the LA(s) do you work closely with when it comes to allocations?

Role of RSL in local allocations systems

- 2. Could you give us an overview of the housing stock held by your RSL? How does this compare to the wider LA (LA itself and/or other RSLs)?
 - Prompt: How does the quality of your properties compare to other RSLs or the LA stock? Does this influence whether clients accept or reject property offers?
 - Prompt: How does your available stock compare to the demand for different property types and locations?
 - Prompt: How does the number and type of housing stock you hold influence your ability to offer properties to different client groups? (e.g. single person accommodation, large families, accessible housing)
 - Prompt: Does your RSL hold and rent properties to specific client groups (e.g. medical needs, large houses, sheltered accommodation etc.)?
- 3. To what extent do you and the wider local partnership of local authority and RSLs currently meet the needs of groups with reasonable preferences applying for social housing? This includes for example those at risk of homelessness or those experiencing homelessness, key workers, single people, families, etc.?
 - Prompt: Are there any barriers for homeless households and households threatened with homelessness to access social housing?
 - Prompt: Do you work together with homelessness services on allocations of social housing?
 - Prompt: How do you address those challenges with anti-social behaviour and/or rent arrears? How does a history of rent arrears or ASB affect or impact your decision to house a prospective contract-holder?
 - Prompt: How do you meet the needs of those with additional or complex needs?
 Do you work with other services in the local authority to ensure support is aligned with accommodation? (e.g. with social services, mental health teams, etc.)
- 4. How do you work together with the local authority?
 - Prompt: Which departments do you work most closely with in the LA? How would you describe your relationship in a few words?
- 5. How do you access the Common Housing Register data and shortlists, or if applicable, nominations?
 - [Where applicable] Prompt: How do you arrive at a shortlist of eligible tenants?

- Prompt: Could you tell us what data currently guides your decision-making on allocations after you receive a shortlist or nominations from the CHR?
- Prompt: Do you inform the LA about why you may reject individuals or why individuals or households are overlooked? Are decisions on tenant selection documented?
- Prompt: What degree of choice is given to prospective tenants within the LA(s) you work closely with?
- Prompt: Are any tenants (re-)allocated to properties without having passed through the local authority system? (e.g. relocation from one property to another instead of allocating to someone on CHR)
- [Where applicable] Prompt: Is the CHR up to date?
- 6. To what extent are you involved in local strategic decision-making or potential reshaping of local policy?
 - Prompt: How does this impact the building and/or acquisition of new properties?
 - Prompt: How does the relationship between available stock and current housing need feed into strategic decision-making in your organisation?
 - Prompt: How does strategic planning differ by household type or property type?

Data collection

- 7. What data do you hold on the allocations process? Which data is shared with local authorities, which data is not?
 - Prompt: How do you collect and store your own data on allocations, client characteristics, and tenancy management? Is there a unified database?
 - Prompt: How often is your internal database updated? How often is data shared with the local authority?
 - Prompt: Do you have access to allocations or offers data over time through your system?
 - Prompt: Is there any data you hold which could help us obtain a better picture of social housing allocations from an RSL perspective? How could we obtain this?
- 8. What are key challenges faced by your RSL with gathering, processing and sharing data in a suitable format?

Overarching questions

- 9. To what extent does the role of your RSL in the local allocations system work well?
 - Prompt: Which client groups does the allocations system currently work well for?
- 10. What parts of the current allocations system present challenges to you, local authorities, or tenants?
 - Prompt: What approaches are being taken to account for individuals with complex needs?

- [If applicable] Prompt: To what extent does rurality present an additional challenge for you?
- Prompt: Are there any unintended consequences from how the system currently works?
- Prompt: Are there any challenges (e.g. through adjacent legislation) affecting your ability to increase your stock and ability to allocate properties to clients in housing need?
- Prompt: Do you anticipate any other future challenges?
- 11. Are there any helpful learnings or any best practice that you would like to share?

Debrief

12. Are there any other issues that you would like to discuss that we have not asked you about?

Annex D: Stakeholder organisation discussion guide

Warm-up

- 1. To get started, could you describe the work of [Organisation Name]?
 - Prompt: Which other organisations do you work closely with?
 - Prompt: At which stages of the allocations process are you most involved?
 - Prompt: Who does your organisation represent and what is the situation of the people or members you work with daily?
- 2. Could you describe in just a few words your role and day-to-day activities within [Organisation Name]?

Themes

[Explanatory note: As the organisations to be interviewed are varied, these interviews require greater deviation from the discussion guide. They focus on key research questions and areas of specialism of each interviewee, structured around six themes: the needs of specific groups, challenges and best practices, stock and housing supply, day-to-day allocation processes, strategic allocation processes, and data collection. Not all themes were discussed in all interviews].

Theme 1: Needs of specific groups

- 3. [If organisation represents a specific group or protected characteristic] To what extent are the needs of [group] met within the social housing system across Wales?
 - Prompt: Does this vary across different stages of the allocations process? E.g. are there different barriers at the application, nomination, and allocation stages?
 - Prompt: What barriers do certain groups with protected characteristics encounter
 in the application and allocation process?
 [Interviewer guidance: Groups of interest include specific age groups, LGBT+,
 ethnic minorities, religion, disabled people, single people vs. couples or families,
 etc. If interviewee only refers to some, follow up by asking about other groups
 too.]
 - Prompt: Have you identified any added impact through the intersectionality of protected characteristics?
 - Prompt: Are there examples of best practice in meeting the needs of [group] in certain local authorities in Wales or internationally?
- 4. [If the organisation does not represent a specific group] To what extent are people's housing needs currently met by the social housing allocations system?
 - Prompt: Are the needs of people with protected characteristics currently being met?
 - [Interviewer guidance: Groups of interest include specific age groups, LGBT+, ethnic minorities, religion, disabled people, care leavers, etc.]
 - Prompt: Have you identified any added impact through the intersectionality of protected characteristics?

- Prompt: Do individuals or families who are experiencing homelessness face any unique challenges?
- 5. Are there any other factors which may adversely impact some households' ability to access social housing?
 - [If relevant] Prompt: Are there any factors which impact care leavers in particular with regards to their respective needs or ability to access social housing?
 - Prompt: What is the impact of rurality and, relatedly, transport links?
 - Prompt: Do you identify any impact of allocations specifically in Welsh-speaking communities?

Theme 2: Challenges and best practice

- 6. What are the main challenges within the social housing allocations system in Wales?
 - Prompt: What are the consequences of a poorly functioning allocations system?
 This includes wider and unintended consequences
 - i. for local authorities.
 - ii. for social landlords.
 - iii. for wider public services.
 - Prompt: Are you aware of potential solutions to these challenges?
- 7. To what extent is the social housing allocation system working well in Wales? Are you aware of any areas of good practice from within Wales?
 - Prompt: Are there any lessons to be learnt from other schemes, such as the resettlement scheme for those fleeing the war in Ukraine?
- 8. What are the potential options to improve the allocation of properties to homeless households? Are you aware of best practice from other countries or from the literature?
- 9. What are the potential benefits to local authorities, social landlords and wider public services of improving allocations to homeless households?

Theme 3: Stock and housing supply

This section will focus first on the shortages of social housing in Wales, followed by the impact this has on individuals and the wider market, as well as ways to address supply issues in Wales.

- 10. Are there any variations in the availability of social housing stock by property type or size?
- 11. Are there variations in the availability of social housing stock by other factors?
 - Prompt: How would you describe the type or level of shortage of social housing in urban versus rural areas?
 - Prompt: Are you aware of other supply issues across types of social housing, such as adapted properties, properties for elderly people, properties for younger people, or properties near employment opportunities or education placements?
- 12. What impact does an insufficient social housing stock have on social housing allocations? What impact does this have on the individuals and households in housing need?

- Prompt: What impact does the current shortage of social housing have on homeless households in particular?
- Prompt: Do you detect any other impacts on different groups with protected characteristics?
- 13. [If applicable] Do challenges facing your sector have any knock-on impacts on social housing availability and allocations?
 - Prompt: How have the changes in material costs, affected by Covid and global events, impacted (your) ability to build or maintain social housing?
 - Prompt: How do political and social perceptions or stigmata impact on the provision of social housing availability within new developments?
- 14. What impact does a lack of social housing stock have on the wider housing market, if any?
 - Prompt: [If applicable] Does an insufficient number of social housing have an impact on the Private Rental Sector?
 - Prompt: [If applicable] Does an insufficient number of social housing have an impact on the development of new private-sector housing?
- 15. How could social housing stock be increased in Wales, particularly to address what has been described as a "severe lack of stock" across local authority areas?
 - Prompt: In instances where these measures have not been implemented, what
 are the barriers preventing this? Do social perceptions or political pressures have
 an impact on the potential to increase social housing stock in certain geographic
 locations?
 - Prompt: Are there examples of parts of Wales where successes in increasing the social housing stock have been achieved? If so, how have these been achieved?
 - Prompt: Would you say that tourist hotspots or areas with large second home ownership have an impact on increasing social housing provision?

Theme 4: Day-to-day processes of allocations

- 16. Do you directly hear from people applying for social housing? [If yes:] How do they describe the experience?
 - Prompt: Do you ever hear from individuals who have waited for long times in priority bands and feel that they are frequently overlooked by social landlords?
 - i. What is the impact of this?
 - ii. Does this affect any protected characteristics more than others?
 - iii. What communication do people receive during that waiting period? Are they made aware of the potential wait time or where they are on the list?
 - iv. How is the "skipping" of their applications on the housing register communicated to them?
 - Prompt: Do you ever hear from individuals who have been nominated by their local authority but were rejected by registered social landlords?
 - i. What is the impact of this? Are they being informed of the reasons behind the rejection?

- ii. Does this affect any groups with protected characteristics more than others?
- Prompt: Do you hear suggestions to improve the allocation of social housing or examples of best practice - from individuals who have direct experience of social housing allocations? If so, could you share some of these?
- 17. Do you ever hear from individuals who are nominated for allocations, but they refuse the properties offered to them?
 - Prompt: Are allocations of accommodation 'suitable' offers based on individual needs and registered preferences?
 - Prompt: On what basis do people refuse properties?
 - Prompt: Does this impact any groups with protected characteristics in particular?
 - Prompt: Do you hear from applicants who worry about being deprioritised on the waiting list, following the rejection of a property?
- 18. [Ask homelessness services] How do you collaborate with other service providers (charities, local authorities, RSLs, Welsh Government) to share information, best practices, and data? How does this improve outcomes for individuals and communities?

Theme 5: Strategic approach to allocations

- 19. What role does your organisation play in informing the social housing allocation policies of different local authorities in Wales (e.g. local or common allocation policy)? Do you have any comments on this process?
- 20. Do you observe any differences in the allocations practices between stockholding and non-stockholding authorities?
- 21. What are your thoughts on Rapid Rehousing's early and likely impacts on social housing allocations in Wales?
- 22. [Subject to response on Rapid Rehousing question] Some local authorities have created priority bands for people currently experiencing homelessness. What is your view on this prioritisation?
 - Prompt: Are you aware of any unintended consequences of people currently experiencing homelessness being included in a priority band?
 - Prompt: Are there any mitigations available for the consequences raised?
- 23. What is the current role of the Private Rental Sector in alleviating homelessness? Could there be greater collaboration between local authorities and the Private Rental Sector (PRS) and how could this be achieved?
 - Prompt: Are there examples of best practice of collaboration between the PRS and local authorities to tackle homelessness in Wales or internationally?
- 24. Are there other strategic approaches to allocation policies which you would like to raise?

Theme 6: Data

25. Is there any data on social housing allocations which you hold – if so, could you describe this data?

- Prompt: For example, quantitative or qualitative data on the time taken for offers
 to be made to specific groups, the types of housing offered, acceptance rates of
 offers, and satisfaction with tenancies.
- Prompt: Would you be able to share this for the purposes of this research?
- 26. What additional data should be collected and/or collated by Welsh Government, local authorities, or other stakeholders?

Debrief

27. Are there any other issues that you would like to discuss that we have not asked you about?

Annex E: Data collection template

8.1 All local authorities were sent a data collection template. The first page of this comprised of the following:

What is this?

This spreadsheet is a tool to help collate data on social housing allocations across Local Authorities. Alma Economics has been commissioned by the Welsh Government to conduct research into how social housing is allocated across Wales. Your time and input is greatly appreciated!

How does this work?

Each sheet in this spreadsheet refers to a different "step" where different types of information needs to be filled out. An overview of each step is below:

- Step 1. LA Details: This step will have you fill in some details about how social housing allocations operate within your local authority. We also ask for the name of who is filling out this template.
- Step 2. Housing register: In this step you will fill in details on how many people are on the housing register, and the demographics of who is on the housing register.
- Step 3. Allocations Data: In this step you will fill in data about the amount of social housing stock and demographics relating to who is allocated to social housing.
- Step 4. Offers Data: In this step you will fill in data about how many offers are given and who is given these offers.
- Step 5. Nominations: In this step you will fill in data about how many nominations they are and who is nominated.

Please fill in either Step 4 or Step 5, depending on what is more relevant to you.

What if some of the questions don't apply to me?

That is completely fine! If something doesn't apply to you, please write in the notes/comments that it doesn't apply, and if possible explain why.

How to input data

Blue cells are where numbers only should be inputted. You will not be able to put any text in any of these cells.

Orange cells are for text, for example if you are answering one of the text-based questions or clarifying something about your data.

What do I do when I have finished?

Thank you so much for taking the time to fill out this template! Once you are done, please email this spreadsheet to [Alma Economics researcher's email] or [Alma Economics researcher's email] and we will reach out if we have any further questions.

I need help!

If you are having troubles filling out this spreadsheet or can't find some of the data we are asking for, that's okay! Feel free to email or schedule a meeting using the links below:

[Alma Economics researcher's email]
[Web link to directly book a meeting with an Alma Economics researcher]

8.2 The second page of the template was titled "Step 1. Local authority details" and comprised of the following:

This section focuses on details about you, your local authority and how social housing allocations work. Please answer the questions below.

- 1. What is the name of your local authority?
- 2. What is your (individual filling out this sheet) name and role?
- 3. Does your LA belong to or operate a Common Housing Register? If yes: What portal/platform do you use? If no: What do you use instead?
- 4. Does your LA belong to or operate a Common Allocations Policy?
- 5. Do you operate with a nominations agreement? If so, what is the target?
- 6. What RSLs or Housing Associations does your LA work with?
- 8.3 The third page of the template was titled "Step 2. Housing register". For each question, local authorities were asked to provide data on those with no duty, a Section 66, 73, and 75 duty in separate Excel cells. They were also asked to note the date at which the data was collected. Space was provided for local authorities to add notes to their data submissions. The questions were as follows:
 - 1. How many people are currently on your housing register?
 - 2. How many people were on your housing register 1 year ago?
 - 3. Of the people currently on the housing register, how many are:
 - i) a single person (household = 1)
 - ii) a couple (household = 2 people in a relationship)

- iii) a family (household = minimum 2 people, where one is a child/dependent)
- iv) all other household types that do not fit the above?
- 4. Of the people currently on the housing register, how many are in need of:
 - i) 1 bedroom homes
 - ii) 2 bedroom homes
 - iii) 3 bedroom homes
 - iv) 4 or more bedroom homes
- 5. Of the people currently on the housing register, how many are:
 - i) aged 16 to 25
 - ii) aged 26 to 64
 - iii) aged 65 or over
- 6. Of the people currently on the housing register, how many are:
 - i) unemployed
 - ii) employed full-time
 - iii) employed part-time
 - iv) self-employed
 - v) unpaid family workers or carers
- 7. Of the people currently on the housing register, how many:
 - i) would self-describe as disabled?
 - ii) of those who are disabled, how many have a physical impairment?
 - iii) of those who are disabled, how many have a mental impairment?
- 8. Of the people currently on the housing register, how many identify as:
 - i) White
 - ii) Asian, Asian Welsh or Asian British
 - iii) Black, Black Welsh, Black British, Caribbean or African
 - iv) Mixed or multiple ethnic groups
 - v) Other ethnic groups

Note: If you have more detailed ethnic group data available and would prefer to send a more detailed version of this data, please mention it in your email to us or schedule a call to discuss further.

- 9. Of the people currently on the housing register, how many identify as:
 - i) Female

- ii) Male
- iii) Other gender identity
- iv) Did not report or prefer not to say
- 10. Of the people currently on the housing register, how many identify as:
 - i) Heterosexual
 - ii) Gay or lesbian
 - iii) Bisexual
 - iv) Other sexuality
 - v) Did not report or prefer not to say
- The fourth page of the template was titled "Step 3. Allocations data". For each question, local authorities were asked to provide data on those allocations to those with no duty, a Section 66, 73, and 75 duty in separate Excel cells. They were also asked to note the date at which the data was collected. Space was provided for local authorities to add notes to their data submissions. The questions were as follows:
 - 1. During the 2023 calendar year, what was the total number of social housing stock in your LA? [Note: Unlike other questions in this section, responses to this were not asked to be broken down by duty]
 - 2. During the 2023 calendar year, how many social housing units became available in your LA? [Note: Unlike other questions in this section, responses to this were not asked to be broken down by duty]
 - 3. During the 2023 calendar year, how many units were allocated to someone? [Note: Unlike other questions in this section, responses to this were not asked to be broken down by duty]
 - 4. Of the units allocated in the 2023 calendar year, how many were allocated to people who: [List of Section 66, 73, 75 duties, and no duty].
 - 5. Of the individuals who have been allocated social housing, how many were allocated to:
 - i) 1 bedroom homes
 - ii) 2 bedroom homes
 - iii) 3 bedroom homes
 - iv) 4 or more bedroom homes
 - 6. Of the individuals who have been allocated social housing, how many are:

- i) a single person (household = 1)
- ii) a couple (household = 2 people in a relationship)
- iii) a family (household = minimum 2 people, where one is a child/dependent)
- iv) all other household types that do not fit the above?
- 7. Of the individuals who have been allocated social housing, how many are:
 - i) aged 16 to 25
 - ii) aged 26 to 64
 - iii) aged 65 or over
- 8. Of the individuals who have been allocated social housing, how many are:
 - i) unemployed
 - ii) employed full-time
 - iii) employed part-time
 - iv) self-employed
 - v) unpaid family workers or carers
- 9. Of the individuals who have been allocated social housing, how many:
 - i) would self-describe as disabled?
 - ii) of those who are disabled, how many have a physical impairment?
 - iii) of those who are disabled, how many have a mental impairment?
- 10. Of the individuals who have been allocated social housing, how many identify as:
 - i) White
 - ii) Asian, Asian Welsh or Asian British
 - iii) Black, Black Welsh, Black British, Caribbean or African
 - iv) Mixed or multiple ethnic groups
 - v) Other ethnic groups

Note: If you have more detailed ethnic group data available and would prefer to send a more detailed version of this data, please mention it in your email to us or schedule a call to discuss further.

- 11. Of the individuals who have been allocated social housing, how many identify as:
 - i) Female
 - ii) Male
 - iii) Other gender identity

- iv) Did not report or prefer not to say
- 12. Of the individuals who have been allocated social housing, how many identify as:
 - i) Heterosexual
 - ii) Gay or lesbian
 - iii) Bisexual
 - iv) Other sexuality
 - v) Did not report or prefer not to say
- 8.5 The fifth page of the template was titled "Step 4. Offers data". Respondents were told that they could fill in Step 5 instead of Step 4 if it was more relevant to their local allocations systems. For each question, local authorities were asked to provide data on those allocations to those with no duty, a Section 66, 73, and 75 duty in separate Excel cells. They were also asked to note the date at which the data was collected. Space was provided for local authorities to add notes to their data submissions. The questions were as follows:
 - 1. What is the number of households that have been offered social housing in the past year?
 - 2. What is the number of offers that have been accepted in the past year?
 - 3. Of the people who received offers, how many were:
 - i) a single person (household = 1)
 - ii) a couple (household = 2 people in a relationship)
 - iii) a family (household = minimum 2 people, where one is a child/dependent)
 - iv) all other household types that do not fit the above?
 - 4. Of the individuals who received offers, how many received offers for:
 - i) 1 bedroom homes
 - ii) 2 bedroom homes
 - iii) 3 bedroom homes
 - iv) 4 or more bedroom homes
 - 5. What was the number of offers that individuals accepted in the 2023 calendar year?
 - 6. Of the individuals who received offers, how many are:
 - i) aged 16 to 25
 - ii) aged 26 to 64

- iii) aged 65 or over
- 7. Of the individuals who received offers, how many are:
 - i) unemployed
 - ii) employed full-time
 - iii) employed part-time
 - iv) self-employed
 - v) unpaid family workers or carers
- 8. Of the individuals who received offers, how many:
 - i) would self-describe as disabled?
 - ii) of those who are disabled, how many have a physical impairment?
 - iii) of those who are disabled, how many have a mental impairment?
- 9. Of the individuals who received offers, how many identify as:
 - i) White
 - ii) Asian, Asian Welsh or Asian British
 - iii) Black, Black Welsh, Black British, Caribbean or African
 - iv) Mixed or multiple ethnic groups
 - v) Other ethnic groups

Note: If you have more detailed ethnic group data available and would prefer to send a more detailed version of this data, please mention it in your email to us or schedule a call to discuss further.

- 10. Of the individuals who received offers, how many identify as:
 - i) Female
 - ii) Male
 - iii) Other gender identity
 - iv) Did not report or prefer not to say
- 11. Of the individuals who received offers, how many identify as:
 - i) Heterosexual
 - ii) Gay or lesbian
 - iii) Bisexual
 - iv) Other sexuality
 - v) Did not report or prefer not to say
- 8.6 The sixth page of the template was titled "Step 5. Nominations". Respondents were told that they could fill in Step 4 instead of Step 5 if it was more relevant to their

local allocations systems. For each question, local authorities were asked to provide data on those allocations to those with no duty, a Section 66, 73, and 75 duty in separate Excel cells. They were also asked to note the date at which the data was collected. Space was provided for local authorities to add notes to their data submissions. The questions were as follows:

- 1. What is the number of households that have been nominated for social housing in the past year?
- 2. What is the number of nominations that have been accepted in the past year?
- 3. Of the people who received offers, how many were:
 - i) a single person (household = 1)
 - ii) a couple (household = 2 people in a relationship)
 - iii) a family (household = minimum 2 people, where one is a child/dependent)
 - iv) all other household types that do not fit the above?
- 4. Of the individuals who were nominated, how many were nominated for:
 - i) 1 bedroom homes
 - ii) 2 bedroom homes
 - iii) 3 bedroom homes
 - iv) 4 or more bedroom homes
- 5. What was the number of nominated housholds that were accepted in the 2023 calendar year?
- 6. Of the individuals who were nominated, how many are:
 - i) aged 16 to 25
 - ii) aged 26 to 64
 - iii) aged 65 or over
- 7. Of the individuals who were nominated, how many are:
 - i) unemployed
 - ii) employed full-time
 - iii) employed part-time
 - iv) self-employed
 - v) unpaid family workers or carers
- 8. Of the individuals who were nominated, how many:
 - i) would self-describe as disabled?

- ii) of those who are disabled, how many have a physical impairment?
- iii) of those who are disabled, how many have a mental impairment?
- 9. Of the individuals who were nominated, how many identify as:
 - i) White
 - ii) Asian, Asian Welsh or Asian British
 - iii) Black, Black Welsh, Black British, Caribbean or African
 - iv) Mixed or multiple ethnic groups
 - v) Other ethnic groups

Note: If you have more detailed ethnic group data available and would prefer to send a more detailed version of this data, please mention it in your email to us or schedule a call to discuss further.

- 10. Of the individuals who were nominated, how many identify as:
 - i) Female
 - ii) Male
 - iii) Other gender identity
 - iv) Did not report or prefer not to say
- 11. Of the individuals who were nominated, how many identify as:
 - i) Heterosexual
 - ii) Gay or lesbian
 - iii) Bisexual
 - iv) Other sexuality
 - v) Did not report or prefer not to say