

Carl Sargeant AC / AM
Y Gweinidog Tai ac Adfywio
Minister for Housing and Regeneration



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref: LF/CS/0186/14

Christine Chapman AM
Chair
Communities, Equality and Local Government Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

19th February 2014

Dear Christine

Housing (Wales) Bill - CELG Committee – Request for Further Information following 6 February Meeting

Thank you for inviting me back to the Communities, Equality and Local Government Scrutiny Committee on 6 February 2014 to discuss the Housing (Wales) Bill.

I promised to provide the Committee with further information on a number of issues. After the Committee's session, you wrote to me on 11 February, seeking clarification on a number of additional points which were not reached during the session itself. These are listed below:

1. whether provisions could be included in the Bill to allow data sharing between relevant authorities and/or departments to help identify landlords within the private rented sector, and to help identify Housing Benefit fraud;
2. what further action can be taken to improve safety standards within the private rented sector, in particular electrical and gas safety, accepting the limitations of the Assembly's legislative competence with regard to health and safety, and how you intend to take this forward in the longer term;
3. existing requirements in relation to support available to prisoners before, and on release from, prison to help address their housing needs, and the extent to which these are being met;
4. in relation to the above, any areas for improvement identified by the Prisoner Accommodation Resettlement Working Group, and how the Bill will contribute towards the delivery of these;

5. whether it is reasonable to enable a local authority to end its homelessness duties for applicants who are likely to be vulnerable on the grounds that they are “unreasonably failing to cooperate”, particularly when their behaviour does not necessarily impact on the authority’s ability to continue to meet its duties under Part 2;
6. detail on the new social housing rent policy, how it links in with exiting the Housing Revenue Account Subsidy system, whether guidance under the new rent system will be statutory and how it will be enforced;
7. the timing of the draft Code of practice under section 28, in particular whether Members will have sight of the draft Code before the Bill completes its passage through the Assembly; and
8. the extent to which the proposals in relation to intentionally homeless households containing children satisfy the obligations under the United Nation Convention on the Rights of the Child.

I am pleased to provide information in response to your request. I will deal with each of the above points in turn:

1. I am currently giving consideration to data sharing in relation to housing benefit and council tax information. Section 237 of the Housing Act 2004 covers the sharing of information in relation to HMO and selective licensing schemes, and we are considering this in the context of making provision for the sharing of information for the purposes of the proposed registration and licensing scheme.
2. The Code of Practice that landlords and letting and management agents will have to adhere to in connection with our proposals to regulate the private rented sector will contain recommendations on good practice in relation to property condition and safety that are linked to the Housing, Health and Safety Rating system. This is the overarching standard covering the health and safety of all occupiers of property irrespective of tenure.

The code will primarily cover management activity and legal obligations. However, it may also include advice on regular checks on gas and electrical safety and having the correct fire precautions in place.

Good management involves keeping properties safe and in in good condition and it is expected that, as landlords become more aware of their obligations over time, standards of property condition and safety will improve across the sector as a whole.

3. I attach a note from the Prisoner Accommodation Resettlement Working Group at **Annex A**, which covers question 3 and 4 above. The note has been produced by the Group and reflects the views and opinions of its members. The Committee should be clear that these are not necessarily the views of the Welsh Government.
4. This question is covered by point 3 above. The note from the Prisoner Accommodation Resettlement Working Group outlines issues considered and action that is being taken to complement the Bill and to address the issues in order to improve arrangements to meet the housing needs of all prisoners, whether or not they are vulnerable.
5. Our intention is that the threshold for invoking the “unreasonably failing to cooperate” provision is high, and that it will only be used where there is clear evidence that the applicant’s failure to co-operate was not due to their vulnerability. This provision would only be applicable where the failure to co-operate had some substantive

impact on the ability of the local authority to meet its duties under Part 2, i.e. prevent or relieve homelessness. The legislation will be supported by a statutory Code of Guidance which will make this very clear. Where an applicant's circumstances change they will be able to make a fresh application, which could happen where their situation deteriorates. We are consulting our lawyers to ensure that this intention is provided for in the Bill.

6. I would like to note that question 6 above and the response below reflects the wording used in the transcript of the Committee's meeting on 6th February as it appears there may have been minor typographical errors in bullet point 6 in the letter of 11 February.

New policy for social housing rents:

The new policy for social housing rents (new rent policy) provides a coherent and consistent rent policy framework for all social landlords and reflects the type, size, location and quality of each landlord's housing stock. The new rent policy was issued in December 2013 for implementation by housing associations in April 2014 and by the eleven stock retaining local housing authorities (LHAs) in April 2015, following exit from HRAS.

A copy of the new rent policy and related tables are attached (at **Annex B**) for information.

Link with exiting the HRAS system:

Under the current arrangements, LHA rents are set in accordance with the LHA guideline rent system which forms part of the complex formula that is used for calculating HRAS. Once LHAs exit HRAS the LHA guideline rent system will automatically end. Consequently, there will be no policy or legislative framework for LHA rent setting.

Therefore, the link between the new rent policy and exiting the HRAS system is that once LHAs have exited HRAS they will be able to implement the new rent policy.

Statutory guidance:

To ensure that Welsh Ministers are able to exert control over LHA rent levels and fulfil their obligations in the Devolved Funding Policy a new policy and legislative framework for LHA rent setting is necessary. This is provided for under Sections 94 to 96 of the Housing Bill where, subject to scrutiny, the Welsh Ministers set a "rent standard" and will issue the new rent policy (at Doc 2) as statutory guidance which will amplify the "rent standard".

Enforcement:

Each LHA will be required to comply with the rent standard and responsibility for ensuring compliance will rest with each LHA's Section 151 Officer. Information on the role and responsibilities of the Section 151 Officer¹ is provided in the footnote below. The role of the Welsh Government will be to monitor ongoing compliance with the

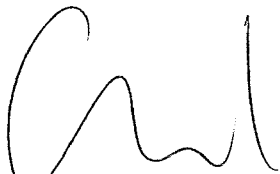
¹ *Section 151 of the Local Government Act 1972 requires every local authority to make arrangements for the proper administration of their financial affairs and nominates one officer to take responsibility for the administration of those affairs. The Section 151 officer is usually the local authority's treasurer and must be a qualified accountant belonging to one of the recognised chartered accountancy bodies. The Section 151 officer has a number of statutory duties, including the duty to report any unlawful financial activity involving the authority or failure to set or keep to a balanced budget. The Section 151 officer also has a number of statutory powers in order to allow this role to be carried out, such as the right to insist that the local authority makes sufficient financial provision for the cost of internal audit.*

rent standard.

7. The Code of Practice, which will be developed with full involvement of stakeholders, will not be available until the Housing (Wales) Bill has completed its passage through the National Assembly for Wales.
8. The UN convention on the Rights of the Child is a general commitment to principles which should underlie a state's approach to children in their legislation. The Bill includes households with children in the categories who have priority need for homelessness assistance (section 55(1)(b)). Children aged 16 and 17 are also specifically included (section 55(1)(f)). In addition, additional protection has been given to households with children, where the applicant is 'intentionally homeless' (section 58(3)). If a household with children cannot be helped under the provisions relating to homelessness, then the combination of the Children Act 1989, other housing legislation, and the Social Services and Wellbeing Bill will ensure these rights are well protected in legislation in Wales. Section 79 of the Bill makes specific provision for co-operation between housing and social services departments if a household contains a child, but might not be helped under the homeless provisions.

I trust that my response to the Committee's request will assist Members in their scrutiny of the Housing (Wales) Bill. Should you or any Member have any further queries or require more information on any aspect, please do not hesitate to contact me.

Yours sincerely,



Carl Sargeant AC / AM
Y Gweinidog Tai ac Adfywio
Minister for Housing and Regeneration

PRISONER ACCOMMODATION RESETTLEMENT WORKING GROUP

NOTE TO THE COMMUNITIES, EQUALITIES AND LOCAL GOVERNMENT COMMITTEE

Introduction

The Minister for Housing and Regeneration established the *Prisoner Accommodation and Resettlement Working Group* to provide advice on the issues surrounding the change to priority need status for former prisoners as part of the homelessness legislation. Its role is also to develop effective arrangements to ensure that prisoners have equal access to support services and/or appropriate accommodation upon release from custody.

Membership

The membership of the group is broad and involves Welsh Government departments and external organisations.

Welsh Government representation includes Housing Policy Division, Community Safety Division, Department for Education and Skills and the Department for Health and Social Services. External organisations include the local government, National Offender Management Service, Wales Probation, South Wales Police, Youth Justice Board and third sector organisations, including Shelter Cymru, Rough Sleepers Cymru, Cymorth Cymru and Gofal Cymru.

Discussion to date

The group has met on two occasions to date, with a third scheduled for 21st February. Discussion has been extremely positive and there is solid commitment from all organisations to improve on current arrangements. It is focusing on identifying the key issues preventing a former prisoner from receiving the same level of service and support as a non offender and will translate this into action, including pilot projects.

Vulnerability

The issue of vulnerability and the removal of priority need status for former prisoners has been discussed at length. There are different opinions within the Group on the amendment to the priority need definition, some organisations support the amendment while others remain extremely concerned by the proposed change. There is a consensus amongst the group that not all former prisoners may meet criteria on vulnerability but for those that do, it is necessary to have both the appropriate accommodation and relevant support to be in place as part of a safe resettlement. It is acknowledged that all prisoners may need housing advice and services and can benefit from them. There is also an acute awareness of the issues surrounding the application of

the vulnerability test and a consensus that vulnerability is very difficult to define in law and in practice.

Vulnerability (the Pereira test) is determined by reference to case law, and representatives from the local authority sector acknowledge that there can be fluctuations in interpretation across Wales. There is also acknowledgement from the group as a whole that placing a finite list of vulnerable categories on the face of the Housing Bill could lead to an equally unsound system where an individual could be defined as vulnerable due to, for example, their age or length of sentence and not based on their individual needs and/or circumstances. The group is mindful of the need to ensure a consistent approach in all areas and is exploring ways in which this can be achieved, including decision making in partnership with relevant agencies.

The issue of female prisoners in custody outside Wales and all prisoners with a dependent child or dependent children is of concern for the group. This has been agreed as a priority for finding practical and effective solutions. Similarly, there is acknowledgement of the need to look at the different lengths of sentences that prisoners receive and to improve ways to retain accommodation for those on shorter sentences. It is also noted that stable accommodation is a key element in the successful treatment for anyone recovering from substance misuse issues. This is a group in which former prisoners are over represented.

The Working Group will be involved in the development of the Code of Guidance, as referred to in Section 81 of the Bill, which is currently being drafted by the Ministerial Working Group.

Improving Prisoner Resettlement

The consideration of vulnerability and matters relating to it is continuing, but the group has begun to focus on reviewing ways to improve prisoners' resettlement.

There is agreement that the majority of former prisoners require a range of support to help ensure their resettlement is successful. This ranges from relatively low level interventions, such as signposting, to concentrated case-management support for those with multiple and complex issues. As a result, the assessment, referral and support system has to be delivered in a co-ordinated and integrated manner utilising the specialist skills of a number of different statutory and non-statutory bodies and third sector organisations.

From discussion, there appears to be anecdotal evidence of informal co-ordinated approaches being carried out in parts of Wales that work well. That said, there are also significant inconsistencies. The reasons are many and varied but there is solid commitment to the goal of a more integrated approach by organisations focusing on the needs of individuals passing through the criminal justice system. Success depends on closer collaboration between prisons and the local authority sector in relation to prisoner

resettlement. Increasing the role of third sector organisations is also important. The Working Group has commissioned an early exercise to map the full extent of the current work and developments. This will identify good practice and possible Wales-wide solutions and it will also identify matters that need to be addressed in order to improve current arrangements

Discussion has suggested that having a single, consistent, contact point for the twenty-two local authorities is an important factor in managing a successful intervention. In relation to future developments, the “Transforming Rehabilitation” agenda (via the UK Government’s Offender Rehabilitation Bill) provides an opportunity to build improvements in to the current provision with the establishment in Wales of both a Community Rehabilitation Company and the National Probation Service having responsibility for prisoners on release.

The Group recognises the significant numbers of prisoners passing through the system on a monthly basis and the average length of stay, which highlights the need for resettlement planning to be co-ordinated at the earliest opportunity with relevant agencies so that accommodation and relevant services are in place to support the individual’s resettlement. In addition, a factor that is often overlooked is the difficulty that sometimes occurs in getting a prisoner to fully engage, which may be due to their vulnerability or another issue. The changes being brought about through the Transforming Rehabilitation agenda should help improve opportunities for ex-prisoners to take responsibility for their resettlement, which is also key to a successful outcome.

Current situation in prisons

The National Offender Management Service has a set of minimum expectations for the delivery of its rehabilitative services in custody. This is defined as the “core rehabilitative offer”, which must be available to all prisoners.

This core offer incorporates access to information or services that can assist prisoners to overcome the impact of imprisonment and to address basic issues linked to their offending. They are considered critical to the delivery of custody which is safe, legal and decent. The minimum level of service is defined in the specification and Governors are required to work closely and in partnership with key agencies to maximise efficiency by enabling prisoners to access mainstream services wherever possible.

Prisons help to address housing issues created as a result of imprisonment by ensuring prisoners are able to access the same specialist housing information and advice services as they would be able to access in the community. They work in partnership with local housing authorities and other housing providers. Key priorities that should be met for all prisoners within the prisons core offer are:

- Ensuring access to appropriate housing on release

Annex A

- Assisting prisoners to close down tenancies or make arrangements to support ongoing tenancies while they are in prison, if appropriate.

In addition, Prison Governors are mandated to ensure:

- All prisoners, including those on remand, are screened for housing need within the first four days of custody, using the Initial Housing Needs Assessment tool or a tool recording the same information.
- All prisoners are assisted to close down or sustain tenancies which are at risk, and to make arrangement to inform landlords, mortgage and insurance companies, where appropriate, of their current circumstances.
- The appropriate forms are available to prisoners who need to sustain or close down housing benefits while in custody.

The Prison Service Order 2350: Housing Needs and Assessment Document outlines the process by which all new prisoners held in a local prison must receive a housing needs assessment within four days of initial reception.

In operation since 2005, the Order requires a nominated member of staff or housing advice worker to complete the assessment which is intended to identify housing issues requiring immediate intervention and to assess the need for future housing intervention. The intention is to assist prisoners at an early stage of sentence to minimise the risk of loss of accommodation, the accrual of rent arrears and difficult in re-opening housing benefit claims. The assessment also establishes a prisoner's address, including No Fixed Abode (which is then fixed as the address of the committing court).

Central to The National Offender Management Service is the principle of offender management that will ensure offenders are managed in a consistent, constructive and coherent way during their entire sentence

To support successful resettlement there are number of specific multi-agency initiatives that are underpinned by the Integrated Offender Management Cymru approach, which includes a particular focus on supporting women offenders from re-offending.

Prison Links Cymru

The Welsh Government currently funds and manages the Prison Links Cymru Service in prisons in Wales. The service, which is delivered by Gwalia Housing and Shelter Cymru, helps to supplement services to address the housing needs of prisoners.

Current Issues

There is an indication that the current priority classification for homeless ex-prisoners has reduced the amount of engagement and early engagement between prisons and housing authorities to plan and manage resettlement

accommodation. For example, in some cases prisoners are required to attend the Housing Department on release before being provided emergency accommodation. It is acknowledged that better and earlier information sharing and planning will help minimise the need for emergency accommodation on the day of release. This is an area that the Working Group is seeking to address.

Future Developments

It should be noted, that as part of the Transforming Rehabilitation agenda, there will be designated resettlement prisons which will enable prisoners who are not currently in a prison nearer their resettlement location to spend the last three months of their sentence near where they are to resettle. This should provide a better opportunity for close partnership working with those prisons.

Action

Impending changes of policy and legislation will be the subject of discussion at the group's next meeting (21 February 2014).

While some members are concerned about the proposal in the Housing Bill to replace the previous test for former prisoners, there is also recognition that should priority need be removed, partners must work together even more closely rather than rely on a local authority's duty to accommodate simply as a result of automatic priority need. The changes in policy in other areas such as mental health and social services and the Transforming Rehabilitation reforms provide a unique opportunity to develop a holistic system of support to help meet the housing needs of all prisoners including those who are at risk of becoming homelessness.

Prisoners who are vulnerable are a particular focus of the Group's work. However, the Group is mindful that housing is relevant to all prisoners and is one of the factors that are important to achieving a successful and sustainable resettlement.

Current proposed action includes:

1. Mapping existing services and provision to identify support systems in place, gaps and further development needed (by end March 2014).
2. Development events to inform work to strengthen the new accommodation pathways for former prisoners (by end April 2014).
3. Pilot project for support for female prisoners held in England to access prevention services prior to release (by end September 2014) .
4. Pilot project to test models of support for delivering the prevention duty to prisoners prior to release (by end September 2014).

5. Input to development of statutory guidance, in particular the chapter concerning supporting former prisoners (by end October 2014).

Policy for Social Housing Rents - Final

Registered social landlords - policy rent summary - uplifted rents for 2014-15 (CPI + 1.5% for both sectors)

TABLE 1

Housing Association	Pre-SAP policy rents (£ per week)	SAP rating (2012-13)	Adjustments due to SAP (£ per week) (per cent)		Post-SAP policy rents (£ per week)	Post-SAP target rent bands, 2014-15 Low end Mid point High end (£ per week) (£ per week) (£ per week)			Stock at 31 March 2013 (units)	Actual rent average, 2013-14 (£ per week)	Average rent, uprated to 2014-15 (£ per week)	Relative to 2014-15 target band (below / above)	Amount below or above £ Per cent	
Aelwyd Housing Association	63.90	75.1	1.93	3.0%	65.83	62.54	65.83	69.12	243	65.89	68.66	Within	.	.
Bro Myrddin Housing Association	74.65	67.0	0.45	0.6%	75.10	71.35	75.10	78.86	790	73.23	76.31	Within	.	.
Bron Afon Community Housing	78.72	72.2	1.69	2.1%	80.41	76.39	80.41	84.43	7,093	75.10	78.25	Within	.	.
Cadwyn Housing Association	82.08	74.0	2.22	2.7%	84.29	80.08	84.29	88.51	1,248	78.91	82.22	Within	.	.
Cardiff Community Housing Association	84.84	71.2	1.58	1.9%	86.42	82.10	86.42	90.75	2,605	77.52	80.78	Below	-1.33	-2%
Cartrefi Conwy	76.06	70.8	1.32	1.7%	77.38	73.51	77.38	81.25	3,757	74.66	77.80	Within	.	.
Cartrefi Cymunedol Gwynedd	79.21	62.1	-1.17	-1.5%	78.04	74.14	78.04	81.94	6,291	69.03	71.93	Below	-2.21	-3%
Charter Housing Association	79.70	74.0	2.15	2.7%	81.85	77.75	81.85	85.94	4,155	80.07	83.43	Within	.	.
Clwyd Alyn Housing Association	79.20	70.0	1.19	1.5%	80.39	76.37	80.39	84.41	3,655	77.73	80.99	Within	.	.
Coastal Housing Group	71.91	73.2	1.76	2.5%	73.68	69.99	73.68	77.36	4,296	75.15	78.31	Above	0.94	1%
Cymdeithas Tai Cantref	79.54	70.0	1.19	1.5%	80.73	76.69	80.73	84.77	1,334	71.52	74.52	Below	-2.17	-3%
Cymdeithas Tai Clwyd	80.43	69.0	0.97	1.2%	81.39	77.32	81.39	85.46	1,664	74.22	77.34	Within	.	.
Cymdeithas Tai Eryri	76.86	69.0	0.93	1.2%	77.79	73.90	77.79	81.68	1,423	70.86	73.84	Below	-0.06	0%
Cynon-Taf Community Housing Group	72.45	67.0	0.43	0.6%	72.89	69.24	72.89	76.53	1,830	73.39	76.47	Within	.	.
Family Housing Association (Wales)	73.91	73.5	1.88	2.5%	75.79	72.00	75.79	79.58	2,219	79.53	82.87	Above	3.29	4%
Gwalia Housing Group	74.66	75.0	2.24	3.0%	76.90	73.06	76.90	80.75	4,557	77.47	80.72	Within	.	.
Hafod Housing Association	80.40	76.1	2.67	3.3%	83.07	78.91	83.07	87.22	3,430	79.29	82.62	Within	.	.
Linc Cymru	79.22	73.2	1.96	2.5%	81.18	77.12	81.18	85.24	3,088	80.74	84.13	Within	.	.
Melin Homes	75.85	73.5	1.93	2.5%	77.78	73.89	77.78	81.67	2,778	77.91	81.18	Within	.	.
Merthyr Tydfil Housing Association	70.39	70.0	1.06	1.5%	71.44	67.87	71.44	75.02	1,008	74.62	77.75	Above	2.74	4%
Merthyr Valleys Homes	74.96	68.6	0.81	1.1%	75.77	71.98	75.77	79.56	4,185	65.92	68.69	Below	-3.29	-5%
Mid Wales Housing Association	75.95	68.0	0.68	0.9%	76.63	72.80	76.63	80.46	1,291	76.56	79.78	Within	.	.
Monmouthshire Housing	82.38	72.9	1.95	2.4%	84.32	80.11	84.32	88.54	3,613	77.94	81.21	Within	.	.
Newport City Homes	78.61	67.7	0.64	0.8%	79.25	75.29	79.25	83.21	8,980	76.12	79.32	Within	.	.
Newport Housing Trust	79.78	75.6	2.54	3.2%	82.32	78.20	82.32	86.43	426	81.71	85.14	Within	.	.
Newydd Housing Association	78.75	73.0	1.89	2.4%	80.64	76.60	80.64	84.67	2,392	76.18	79.38	Within	.	.
North Wales Housing Association	77.88	71.6	1.55	2.0%	79.43	75.46	79.43	83.40	1,873	75.69	78.87	Within	.	.
NPT Homes	76.86	62.5	-0.98	-1.3%	75.88	72.09	75.88	79.68	8,983	75.41	78.58	Within	.	.
Pembrokeshire Housing Association	78.49	73.0	1.88	2.4%	80.37	76.36	80.37	84.39	2,071	76.92	80.15	Within	.	.
RCT Homes	72.96	73.0	1.75	2.4%	74.71	70.98	74.71	78.45	10,102	76.70	79.92	Above	1.47	2%
Rhondda Housing Association	72.89	67.0	0.44	0.6%	73.32	69.66	73.32	76.99	1,479	74.47	77.60	Above	0.61	1%
Taff Housing Association	84.74	76.5	2.92	3.4%	87.66	83.28	87.66	92.05	886	84.13	87.66	Within	.	.
Tai Calon Community Housing	72.12	63.8	-0.44	-0.6%	71.68	68.10	71.68	75.27	6,176	64.84	67.56	Below	-0.54	-1%
Tai Ceredigion	80.23	66.0	0.24	0.3%	80.47	76.44	80.47	84.49	2,224	69.95	72.89	Below	-3.56	-5%
United Welsh Housing Association	76.90	78.2	3.05	4.0%	79.95	75.95	79.95	83.94	3,539	79.52	82.86	Within	.	.
Valleys to Coast Housing	76.89	74.7	2.23	2.9%	79.11	75.16	79.11	83.07	5,736	76.41	79.62	Within	.	.
Wales and West Housing	76.66	73.0	1.84	2.4%	78.50	74.58	78.50	82.43	8,070	77.68	80.94	Within	.	.
Minimum	63.90	62.1	-1.17	-1.5%	65.83	62.54	65.83	69.12		64.84	67.56	Below		7
Maximum	84.84	78.2	3.05	4.0%	87.66	83.28	87.66	92.05		84.13	87.66	Within		25
Total												Above		5

Source: Welsh Government Social Rent Model

New policy for social housing rents

1. Introduction

The Essex Review of affordable housing policy carried out in 2008 pointed to the unfairness of the current system of rent setting for both social landlords¹ and their tenants and recommended a full review. A rent review group was established with a remit to develop proposals for a new policy that would apply consistently to both housing association² and local authority sectors. The review group, which included representatives from social landlords and tenant groups, developed proposals for a new approach.

The Welsh Government consulted on a proposed new policy for social housing rents in Wales during 2011. The review group, considered consultation responses and proposed amendments to the policy. The amended policy was re-issued to both housing association and local authority sectors for consultation in May 2012. Since that time, the review group has considered various aspects of the policy including improving the SAP data collection, bringing sheltered housing within the scope of the new rent policy and the principle that all landlords should disaggregate service charges from rent.

The Welsh Government issued a draft final version of the new policy for social rents together with a discussion paper on inflation indices in October 2013. Comments were invited from all stakeholders and representations were made via stakeholders representative groups in addition to a meeting of the HRAS & Rents steering group on 11th November 2013.

¹ The terms “social landlords” and “landlords” in this document means housing association and local housing authority landlords. Reference to local housing authority means those authorities that have retained their housing stock.

² References in this document to “housing associations” relate only to Registered Social Landlords (RSLs) that are registered with and regulated by the Welsh Government.

The Welsh Government has taken on board many of the issues raised during this latest consultation which are reflected in this document. This document now sets out the final policy and the principles on which it is based. The following documents are attached for your information:

- Table 1 sets out the target rent bands³ for each individual housing association for 2014/15;
- Table 2 sets out the locational indices used in the calculation of the rent matrix for 2014/15;
- Table 3 sets out the Rent Policy Matrix for 2014/15; and
- Table 4 sets out the indicative target rents bands for each local authority.

Please note, that Tables 1 and 4 include the annual rent increase that has been agreed by the Minister for Housing and Regeneration in the Autumn 2013 for 2014/15 rent increases (see paragraph 7).

The Minister for Housing and Regeneration made a decision for the new Rent policy to be implemented for housing associations from April 2014 and for local authorities in April 2015 following exit from the Housing Revenue Account Subsidy system. Where a social landlord currently pools rents and service charges, they are now required to start the process of disaggregating service charges from rent and to complete the exercise by March 2016. Where a social landlord is unable to meet this timescale consideration will be given to the provision of extended transitional arrangements.

³ The original consultation proposed that a landlord's final rental income should fall within 5% of the target rental income. This has been replaced in the revised policy with the Target Rent Band which mainstreams the 5% tolerance. The mid point of the Target Rent Band is equivalent to the average target rent that was set out in the consultation proposal.

2. Background

The case for reviewing existing social sector rent policies was made by the Essex Review. Rent policies in Wales had developed in different ways over a long period, and produced markedly different levels and profiles of rents across the country, and between tenures. Variations in council rents between councils were largely driven by the values of dwellings sold under the right to buy, based on a subsidy formula that goes back to 1989. Variations in housing association rents were driven by the similarly long established 'benchmarking' regime for new grant aided developments. This resulted in a much narrower variation in rents across Wales, and also groups local authority areas together into rent bands for which there was no apparent rationale, either in terms of housing or labour market characteristics.

The consequence of all of this was not only different average levels of rents between the local authority and housing association sectors, but different levels of rents across Wales within those sectors. In some areas the rents in the two sectors are, at least in aggregate, reasonably close; while in others they diverge very substantially.

In that context the rent review sought to develop a coherent and consistent rent policy framework that would apply to all social landlords, reflects local variations in affordability and housing market values, providing for a more equitable distribution of rents for social sector tenants across Wales, while at the same time ensuring the viability of individual social landlords.

3. The new policy for social housing rents

The final policy maintains the key principles and structure put forward in the original consultation document, but with some revisions to the detail to reflect the issues raised in the responses to the consultation, and their subsequent discussion with the review group and consideration by the Welsh Government. A summary of the key changes made to the policy are:

3.1 Sheltered Housing

The initial consultation on the proposed new rent policy advised that the policy would apply to general needs stock in the first instance and consideration would be given to rolling out the policy to sheltered stock once data became available. As the data is now available, the review group agreed that the rent policy should apply to both general needs and sheltered housing stock.

3.2 Bungalows

Detailed consideration was given to how bungalows should be treated within the new rent policy. As there was no data available to indicate the number and location of bungalows across Wales, the Welsh Government subsequently revised data collection forms to ensure that data on bungalows became available.

Having analysed the data, the Welsh Government modelled a range of options. This identified that if bungalows were to be treated separately from houses and given an increased weighting, due to the complexity of the interactions between property types within the new rent policy model, this would have an adverse impact upon the policy rent for most landlords. This is because where a bungalow premium is applied, the model would target some rent towards those landlords with bungalows, and take some away from landlords with other types of properties. In some cases those landlords with bungalows would gain from the bungalows, but lose perhaps more in respect of their other properties. The modelling showed that the majority of landlords would have seen a reduction in their policy rent, and for some this was up to £1.40 per week.

It has therefore been agreed that, for the purposes of the new rent policy, houses and bungalows will continue to be treated the same.

3.3 Larger properties

The Welsh Government revised the stock and rent data collection forms in order to gather data on larger properties and the data on 5 bed plus houses is now available. The Rent Steering Group agreed that the 5 bed plus houses will be taken into consideration within the new rent policy with an increased weighting of 10 percentage points as compared to the weighting given to 4 bed properties (see paragraph 4.4 for details).

3.4 Quality

During the development of the new rent policy, there was a desire for the quality of social housing to be reflected in the calculations. In the absence of other available data, it was agreed that the average Standard Assessment Procedure (SAP) ratings of properties for each category of housing were to be used as a proxy for quality. This was based on the SAP ratings recorded in Energy Performance Certificates (EPC) for all newly-let and re-let properties. The Welsh Government collected data on EPCs/SAP ratings in 2011-12 for use in this model which was initially adopted and consulted upon.

Subsequently, a number of issues came to light which resulted in the review group re-considering how quality could continue to be reflected within the rent policy. The group agreed to revise and simplify the data collection methodology. The revised data collection is based on the average SAP rating for self contained general needs and for sheltered stock. It also collects an average across both categories, based on EPC data where available and cloned data where EPC data is not available.

The way in which the SAP data is used within the new rent policy is explained in paragraph 4.6.

4. The New Policy Framework:

The new policy for social housing rents is a policy framework that will, subject to local authorities exiting from HRAS, apply to all social landlords and consistently reflect variations in the type size, quality and location of each landlord's housing stock.

The responsibility for setting the rents for individual dwellings will remain with individual landlords as is currently the case. This is because there are important localised issues that landlords need to take into account when setting the rents for individual dwellings, and that inherently these cannot be adequately reflected in any wholly centralised rent policy regime.

The rent policy will apply to;

- all social landlords that have 100 or more dwellings;
- general needs and sheltered housing regardless of whether the housing was funded by Social Housing Grant (SHG), Housing Association Grant (HAG), from a landlord's own resources or otherwise⁴.

The following types of housing are exempt from the rent policy:

- extracare housing;
- supported housing;
- intermediate rent housing;
- market rent housing; and
- other specialised forms of provision.

⁴ For detailed definitions of the stock that falls within the scope of this policy please refer to the general guidance notes and the definitions included in the Welsh Government annual statistical returns on social landlords stock and rents.

4.1 Target Rent Band

The rent policy sets a target rent band for each landlord and landlords will be required to operate with average weekly rent levels that fall within the scope of those bands.

The target rent provides a low end figure, a mid point and a high end figure for each landlord. The average weekly rent level for each social landlord is compared to the target rent band and Tables 1 and 4 show where the average weekly rent needs to be increased or reduced to fall within the target rent band.

The target rent bands provide landlords with a continuing measure of discretion over their overall rent levels. The target rent bands for each landlord are based on a consistent set of principles and a common methodology across Wales that applies equally to both local authority and housing association landlords.

The following section of this document sets out the detailed methodology and data sources that have been used to arrive at the target rent bands for each landlord.

4.2 The Rent Matrix

The target rent bands for each landlord are based on a rent matrix that sets indicative policy rent levels for each size and type of dwelling, for dwellings in each local authority area. The key components agreed for the matrix are:

4.3 Location

This is based on local authority areas because this is the only level at which data on the stock and rents of social landlords and the chosen locational indicators, is available. It is recognised that property values and other market characteristics vary within local authority areas, and this is one of the reasons for leaving landlords with the responsibility for setting the distribution of rents within their own stock.

Following the consultation the Review Group agreed that the locational index for each area should be based on four factors – house prices, private rents, place of work based earnings, and place of residence based earnings. The indexes for those factors, are

based on calculated values for two bedroom dwellings and the data for the three years 2010 – 2012 are set out in Table 2, together with the overall composite locational index to be applied within the rent matrix.

Following the consultation exercise the Review Group was of the view that if the composite index was applied without any damping⁵ this would result in a substantial and undesirable widening of rent differentials across Wales. The locational index has therefore been damped by 33.3% which is shown in Table 2.

4.4 Type and Size of Dwellings

It was agreed that rents should have a higher value for houses and bungalows compared to those for flats and maisonettes and rents should have a higher value for larger dwellings. The rent policy matrix simply provides for the policy rents to reflect the following weightings:

Type:	Weighting
Houses and Bungalows	105
Flats and maisonettes	95
Size:	Weighting
Bedsits	80
One Bedroom	90
Two Bedroom	100
Three Bedroom	110
Four Bedroom	120
Five Bedroom plus	130

⁵ The “damping” process applied has reduced the differences in the location indices applied across local authority areas. .

These size differentials are roundly based on the average differentials currently prevailing within the social rented sector.

4.5 Average rent levels:

In creating a matrix of policy rents for 2013/14, it was agreed that the national target average rent is based on the average housing association rents at April 2013 and not the average across both social sectors. This will continue to be applied and would allow for the convergence of rents in both sectors to be towards housing association rent levels rather than towards the mid point of both sectors. To do otherwise would depress the housing association rental income.

Applying all of the factors above generates a rent policy matrix which sets out the policy rent for each type and size of property with each local authority geographical area. The rent policy matrix for 2014/15 is provided at Table 3.

These policy rent figures are applied to the characteristics⁶ and location of each landlord's housing stock to arrive at a Pre SAP policy rent for each landlord (shown on Tables 1 and 4).

4.6 Quality

As part of the development of the rent policy the review group were seeking to apply a quality factor which would enable a financial adjustment to be made to a landlord's target rent band to reflect the quality of each landlord's housing stock.

The approach taken to how the quality of dwelling stock could be included in the new rent policy was largely driven by the lack of available data. As there is no comprehensive measure of the physical quality of each home, the policy focuses on the issue of energy efficiency, partly because this is an important relevant factor (as it impacts on the costs tenants face), and partly because this is an area where it is believed comparable and consistent data will become available.

⁶ Information on social landlord's average weekly rent and stock profile is collected annually by Welsh Government via the Stock and Rents returns.

As mentioned earlier, the methodology for assessing the quality of each landlord's housing stock has been revised and is now based on the average Standard Assessment Procedure (SAP) rating for self contained general needs and sheltered stock, based on EPC data where available and cloned data where EPC data is not available.

It was agreed by the review group that the SAP adjustments should be based on the Welsh Housing Quality Standard (WHQS) threshold of 65. The SAP adjustments are based on estimates to the costs and savings for residents in living in dwellings with lower and higher energy efficiency ratings. This means that:

for each SAP point above 65 policy rents are increased by 0.3%; or

for each SAP point below 65 policy rents are reduced by 0.5%.

The SAP ratings for each landlord, and the adjustment made to the calculation of their target rent band is shown in Tables 1 and 4.

The SAP percentage adjustment is applied to the Pre-SAP Policy rent, to reflect the quality of each landlords stock, to arrive at the Post-SAP policy rent. The Post-SAP Policy rent becomes the mid point of the Target Rent Band for each landlord. The higher and lower limits of the target rent band are arrived at by applying a 5% upper and lower limit to the SAP adjusted mid point of the target rent band.

Where a landlord holds housing stock in more than one local authority area, the landlord's target rent band will be calculated by aggregating the 2013/14 Pre-SAP policy rent for each local authority area in which the landlord holds housing stock. Then apply the SAP adjustment percentage to arrive at the Post-SAP policy rent which becomes the mid point of the target rent band then apply the minus and plus 5% to arrive at the low and high end of the target rent band.

5. Impacts of the new rent policy

The average policy rents for each local authority geographical area, based on the rent policy matrix, are shown in Table 3. This also shows the matrix policy rents for each type and size of dwelling in each local authority area, from which the overall local authority average figures are derived taking account of the overall composition of the social housing stock in each area. These figures are provided for information, as an aid to understanding the basis on which the target rent bands for each landlord have been calculated.

As already indicated the setting of rents for individual dwellings, and the treatment of the issues of locality, size, quality and type of dwelling within their rent setting policies, remains the sole responsibility of individual landlords, in consultation with their tenants. While landlords may wish to have regard to the profile of rents within the matrix when reviewing their detailed rent setting policies that is entirely at their discretion, subject to ensuring that their average weekly rent continues to fall within the target rent band each year.

As Tables 1 and 4 indicate in many cases landlords current rents already fall within the target rent bands set by the new policy. In other cases, however, landlord's current average weekly rent falls either above or below the target rent band, and will require some future adjustments in order for landlords to comply with the new policy. Transitional measures have been put in place to ease the impact of the new policy on both landlords and their tenants.

6. Transitional protection

During the development of the new policy the review group emphasised the need for transitional arrangements so that neither landlords (nor their funders) or tenants face substantial upheavals in their financial affairs.

Landlords with current average weekly rents above the level of the target rent bands will not be expected to immediately comply with the new policy, nor will they be expected to reduce rents from those current levels. Rather in the years ahead they will be expected to increase their rents at a slightly lower rate compared to landlords whose rents are already compliant with the new policy.

Where landlords will need to increase their average weekly rent so that it falls within the target rent band, transitional protection for tenants will apply. In any year landlords will not be permitted to increase the rents for any individual tenant by more than £2 per week **in addition** to the agreed average annual rate of rent increases for the sector as a whole.

Where a landlord has concerns about the impact of the new policy upon its business plan and financial viability, or in its ability to meet its obligations to tenants and lenders, having taking into consideration the transitional arrangements for landlords and tenants, the landlord should urgently raise the matter with the Welsh Government. Consideration will be given to providing either an agreed time limited waiver from the policy or extended transitional arrangements, subject to Welsh Government consent.

7. Mechanism for annually uplifting rent levels

The Minister for Housing and Regeneration has agreed the following:

- The inflation indices to be used for uplifting rents each year will be based on CPI at the previous September;
- A real increase percentage of 1.5% will be applied to the inflation indices;
- The same real increase will apply to all social landlords;
- The increase applied in 2014/15 is CPI (2.7%) plus 1.5% and will be fixed for a period of 5 years to 2018/19; and
- The only exception would be to this rule where CPI falls outside a range of between 0% and 4%. If CPI falls below 0%, or is above 4%, The Minister for Housing and Regeneration will be able to make a decision on the level or rent

increases to be applied in that year only. Use of this exceptional circumstance is considered appropriate in order to protect the interests of tenants and/or social landlords from significant movements in CPI.

8. Next Steps

The new policy for social housing rents has been subject to an equality impact assessment by the Welsh Government and will be published on the Welsh Government's website in due course.

All social landlords are also asked to carry out an equality impact assessment on their proposals to implement this rent policy framework at the local level.

The new policy will be evaluated and subject to detailed review within a period of 3 to 5 years.

Landlords will need to consider how they will take the new rent policy forward at a local level and are required to carry out appropriate consultation with tenants. Landlords should consider the implications upon their business plan and if any financial viability issues are identified, please raise the matter with one of the following members of the Regulation Team at the earliest opportunity:

Naheed Hussain	030 062 8176	naheed.hussain@wales.gsi.gov.uk
Carol Kay	030 062 8172	carol.kay@wales.gsi.gov.uk
Peter Griffiths	030 062 8303	peter.griffiths3@wales.gsi.gov.uk
Nick Gerrard	030 062 2383	nick.gerrard@wales.gsi.gov.uk

Homes and Places

Welsh Government

December 2013

Policy for Social Housing Rents - Final																		
Rent policy matrix calculations, 2014-15 (uplifted by CPI + 1.5% for both sectors)																TABLE 3		
	Bedsits, houses and flats								Houses						Flats			
	Bedsits	1 bed	2 bed	3 bed	4 bed	5+ bed	All stock		1 bed	2 bed	3 bed	4 bed	5+ bed		1 bed	2 bed	3 bed	4 bed
Blaenau Gwent	51.00	59.27	68.94	77.51	84.56	91.61	70.96		63.42	70.47	77.51	84.56	91.61		57.38	63.75	70.13	76.51
Bridgend	56.30	64.01	74.02	85.42	93.34	101.12	76.47		70.01	77.79	85.57	93.34	101.12		63.34	70.38	77.42	84.45
Caerphilly	56.53	65.06	75.57	85.82	93.71	101.52	78.47		70.29	78.09	85.90	93.71	101.52		63.59	70.66	77.72	84.79
Cardiff	63.35	72.00	83.64	96.03	104.83	113.79	84.98		78.78	87.53	96.28	105.04	113.79		71.27	79.19	87.11	95.03
Cardemarthenshire	55.89	64.05	75.56	84.86	92.59	100.38	77.03		69.49	77.21	84.94	92.66	100.38		62.88	69.86	76.85	83.83
Ceredigion	58.90	67.39	78.78	89.36	97.49	105.79	80.12		73.24	81.38	89.52	97.65	105.79		66.27	73.63	80.99	88.35
Conwy	56.69	65.14	74.57	85.92	93.85	101.81	76.33		70.49	78.32	86.15	93.98	101.81		63.77	70.86	77.95	85.03
Denbighshire	57.79	66.53	77.36	87.79	95.81	103.79	78.65		71.85	79.84	87.82	95.81	103.79		65.01	72.23	79.46	86.68
Flintshire	59.59	70.69	79.92	90.21	98.80	107.03	82.25		74.10	82.33	90.56	98.80	107.03		67.04	74.49	81.94	89.39
Gwynedd	55.43	63.41	74.16	84.06	91.87	99.56	78.31		68.92	76.58	84.24	91.90	99.56		62.36	69.29	76.22	83.15
Isle of Anglesey	58.55	69.44	78.37	88.92	97.08	105.16	81.67		72.81	80.90	88.99	97.08	105.16		65.87	73.19	80.51	87.83
Merthyr Tydfil	52.43	61.73	71.16	79.62	86.93	94.17	73.54		65.20	72.44	79.68	86.93	94.17		58.99	65.54	72.09	78.65
Monmouthshire	61.89	71.64	82.31	93.82	102.60	111.15	82.61		76.95	85.50	94.05	102.60	111.15		69.62	77.36	85.10	92.83
Neath Port Talbot	54.94	62.45	72.22	83.40	91.08	98.68	75.47		68.31	75.90	83.49	91.08	98.68		61.81	68.67	75.54	82.41
Newport	57.75	65.64	75.09	87.36	95.70	103.72	78.39		71.80	79.78	87.76	95.74	103.72		64.96	72.18	79.40	86.62
Pembrokeshire	58.33	67.34	78.48	88.47	96.70	104.76	80.22		72.53	80.59	88.64	96.70	104.76		65.62	72.91	80.20	87.49
Powys	55.54	64.57	74.37	84.28	92.08	99.75	76.58		69.06	76.73	84.41	92.08	99.75		62.48	69.43	76.37	83.31
Rhondda Cynon Taf	53.29	60.52	70.66	80.77	88.35	95.71	72.48		66.26	73.62	80.98	88.35	95.71		59.95	66.61	73.27	79.93
Swansea	57.54	65.16	76.61	87.03	95.40	103.34	77.21		71.55	79.50	87.45	95.40	103.34		64.73	71.93	79.12	86.31
Torfaen	56.56	64.50	74.67	85.76	93.68	101.58	78.63		70.33	78.14	85.95	93.77	101.58		63.63	70.70	77.77	84.84
Vale of Glamorgan	62.34	70.58	81.80	94.26	103.35	111.96	85.57		77.51	86.12	94.73	103.35	111.96		70.13	77.92	85.71	93.50
Wrexham	58.51	68.31	77.95	88.75	97.00	105.08	80.27		72.75	80.83	88.92	97.00	105.08		65.82	73.14	80.45	87.76
Wales	58.39	66.28	76.26	86.77	95.97	106.63	78.51		71.59	78.97	86.94	95.99	106.63		65.04	72.02	79.81	91.15

Policy for Social Housing Rents - Final
Locational index used in calculation of 2014-15 policy rent matrix

TABLE 2

Local authority	Separate components								Components combined into the locational index	
	House prices		Private rents		Workplace earnings		Residence earnings		Undamped	Damped
	£k	(Wales=100)	£pw	(Wales=100)	£pw	(Wales=100)	£pw	(Wales=100)		
Blaenau Gwent	71,301	61.6	82.3	77.2	317.1	96.4	317.7	95.4	82.7	88.4
Bridgend	104,083	89.9	104.2	97.8	329.0	100.0	326.4	98.0	96.4	97.6
Caerphilly	98,286	84.9	104.3	97.9	340.5	103.5	338.9	101.8	97.0	98.0
Cardiff	137,348	118.6	137.0	128.6	353.0	107.3	348.3	104.6	114.8	109.8
Carmarthenshire	105,052	90.7	96.8	90.9	328.7	99.9	332.7	99.9	95.4	96.9
Ceredigion	135,304	116.8	112.3	105.4	308.3	93.7	322.4	96.8	103.2	102.1
Conwy	124,075	107.1	110.4	103.6	292.1	88.8	300.2	90.2	97.4	98.3
Denbighshire	111,559	96.3	107.2	100.6	345.6	105.0	330.2	99.2	100.3	100.2
Flintshire	119,262	103.0	116.0	108.9	349.4	106.2	339.1	101.8	105.0	103.3
Gwynedd	119,824	103.5	94.1	88.3	303.5	92.3	308.5	92.6	94.2	96.1
Isle of Anglesey	122,982	106.2	108.9	102.2	326.2	99.2	338.1	101.5	102.3	101.5
Merthyr Tydfil	80,929	69.9	86.8	81.4	318.9	97.0	323.6	97.2	86.4	90.9
Monmouthshire	149,880	129.4	121.2	113.7	315.1	95.8	349.2	104.9	111.0	107.3
Neath Port Talbot	86,802	75.0	97.3	91.4	354.3	107.7	324.8	97.5	92.9	95.3
Newport	109,595	94.6	113.0	106.1	329.3	100.1	332.8	100.0	100.2	100.1
Pembrokeshire	128,982	111.4	108.5	101.8	320.1	97.3	320.6	96.3	101.7	101.1
Powys	122,817	106.1	93.2	87.5	297.5	90.4	312.5	93.9	94.5	96.3
Rhondda Cynon Taf	87,480	75.5	90.8	85.2	313.2	95.2	327.8	98.4	88.6	92.4
Swansea	108,864	94.0	114.0	107.0	320.9	97.6	333.0	100.0	99.7	99.8
Torfaen	99,814	86.2	107.4	100.8	320.8	97.5	346.0	103.9	97.1	98.1
Vale of Glamorgan	136,928	118.2	126.2	118.4	340.8	103.6	360.4	108.2	112.1	108.1
Wrexham	116,095	100.2	112.0	105.1	332.4	101.0	340.5	102.3	102.2	101.4
Wales	115,807	100.0	106.5	100.0	329.0	100.0	333.0	100.0	100.0	100.0

Source: Welsh Government Social Rent Model

Notes:

- Each component of the index is shown as its actual value based on the sources below, and expressed as an index relative to Wales = 100.
- The four separate index values are then averaged together to derive the **undamped** locational index.
- The locational index is then **damped** by a factor of one-third (applied to the undamped values) and is the final index used within the rent matrix calculations.

Data sources (all based on three year averages covering the period 2010-2012):

- House prices: Mean selling price for 2 bedroom dwellings based on data for loan advances from the Council for Mortgage Lenders
- Private rents: Median weekly rent data for 2 bedroom private sector properties from the Rent Officers Wales
- Workplace earnings: Lower quartile gross weekly full time earnings including overtime on a workplace-basis from the Annual Survey of Hours and Earnings, Office for National Statistics
- Residence earnings: Lower quartile gross weekly full time earnings including overtime on a residence-basis from the Annual Survey of Hours and Earnings, Office for National Statistics

Policy for Social Housing Rents - Final

Local authorities - policy rent summary - uplifted rents for 2014-15 (CPI + 1.5% for both sectors)

TABLE 4

Registered social landlord	Pre-SAP	SAP	Differences due to SAP		Post-SAP	Post-SAP target rent bands, 2014-15			Stock at 31	Actual rent	Actual rent	Relative to	Amount	
	policy rents (£ per week)	rating (2012-13)	(£ per week)	(per cent)	policy rents (£ per week)	Low end (£ per week)	Mid point (£ per week)	High end (£ per week)	March 2013 (units)	average, 2013-14 (£ per week)	average, 2014-15 (£ per week)	2014-15 target band (below / above)	below or above £	Per cent
Caerphilly	78.87	66.0	0.24	0.3%	79.11	75.15	79.11	83.06	10,887	72.00	75.02	Below	-0.13	0%
Cardiff	85.48	69.0	1.03	1.2%	86.50	82.18	86.50	90.83	13,661	80.78	84.17	Within	.	.
Carmarthenshire	77.76	63.0	-0.78	-1.0%	76.99	73.14	76.99	80.84	9,073	70.06	73.00	Below	-0.14	0%
Denbighshire	78.81	66.0	0.24	0.3%	79.05	75.09	79.05	83.00	3,458	66.38	69.17	Below	-5.93	-8%
Flintshire	82.64	65.0	0.00	0.0%	82.64	78.51	82.64	86.77	7,402	74.55	77.68	Below	-0.83	-1%
Isle of Anglesey	81.82	68.0	0.74	0.9%	82.56	78.43	82.56	86.69	3,806	66.63	69.43	Below	-9.00	-11%
Pembrokeshire	80.89	71.0	1.46	1.8%	82.35	78.23	82.35	86.46	4,819	63.97	66.66	Below	-11.57	-15%
Powys	77.60	65.6	0.14	0.2%	77.74	73.85	77.74	81.63	5,407	78.75	82.06	Above	0.43	1%
Swansea	78.76	63.7	-0.51	-0.6%	78.24	74.33	78.24	82.16	13,575	70.48	73.44	Below	-0.89	-1%
Vale of Glamorgan	86.95	67.8	0.74	0.8%	87.68	83.30	87.68	92.07	3,236	79.82	83.17	Below	-0.13	0%
Wrexham	80.78	73.0	1.94	2.4%	82.72	78.58	82.72	86.86	11,322	71.50	74.50	Below	-4.08	-5%
Minimum	77.60	63.00	0.14	0.2%	76.99	73.14	76.99	80.84		63.97	66.66	Below		9
Maximum	86.95	73.00	1.94	2.4%	87.68	83.30	87.68	92.07		80.78	84.17	Within		1
Total												Above		1

Source: Welsh Government Social Rent Model