

# White Paper on securing a path towards adequate housing, including fair rents and affordability

## Consultation Response Form

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## Consultation Questions

**Q1:** If the seven factors of adequate housing were used in Wales to monitor housing adequacy, what indicators could be appropriate to evaluate each of the seven factors of housing adequacy? (The seven factors are listed below and a more detailed discussion of each factor is set out earlier in Chapter 2. Please use these as headings and set out under each heading the indicator or indicators you believe may be appropriate to use.)

Security of tenure

Availability of services, materials, facilities and infrastructure

Affordability

Habitability

Accessibility

Location

Cultural adequacy

**Security of tenure:** Whilst security of tenure is an integral part of the right to adequate housing, Welsh Women's Aid would like to take this opportunity to highlight the negative impact that the Renting Homes Act has had on emergency refuge accommodation providers in the violence against women, domestic abuse and sexual violence sector. Emergency refuge accommodation is not intended to be a home. Welsh Women's Aid would like to ensure that similar implications are not felt through this white paper.

Survivors of coercive control often find themselves left from the paperwork of tenancy agreements. The Welsh Government would do well to take this opportunity to provide for regulations that give survivors equal rights in relation to tenancy agreements. This would mean ensuring survivor's feel security of tenure if they are not on the tenancy agreement. Survivors of VAWDASV often experience insecurities within the home and this can impact on their ability to leave abusive relationships, further creating dangerous situations. It is vital that

**Affordability:** Affordability is often a barrier to survivors accessing rented accommodation. This can both be in terms of unaffordable rent and survivors having additional barriers when facing deposit schemes. Deposits can often be unaffordable to survivors due to a number of factors including experiences of coercive and financial control. Surviving Economic Abuse highlighted in 2020, 1 in 6 women experience financial abuse in the UK. Welsh Women's Aid highlighted this challenge in our green paper response.

**Location:** Survivors no longer need to meet the locality test in England. To allow survivors to be housed safely and access more housing, it is important that survivors of VAWDASV are given an exemption to the local connection test when looking at allocation for social housing.

**Q2.** If indicators are developed to measure housing adequacy in Wales, should they apply in the same way across Wales or should they feature a degree of regional or localised variation?

- Yes - apply consistently across Wales
- No - regional or localised variation
- No views
- Don't know

If so, how might this work in practice?

Don't know

**Q3.** Should people who live in a particular local authority area be able to access adequate housing in any locality of their choosing within that local authority?

- Yes
- No
- No views
- Don't know

What are your views on this matter?

Yes, survivors should be able to access safe and adequate housing regardless of their locality to an area. It is often important to house survivors away from their local area or connections. This can be because the survivor has chosen that as a result of their lived experiences they want to move away for a 'new start'. These reasons are discussed in detail in our previous consultation response on homelessness: <https://welshwomensaid.org.uk/wp-content/uploads/2024/01/WWA-Response-Consultation-on-the-White-Paper-on-Ending-Homelessness-in-Wales.pdf>.

Survivors may also need to be placed away from their local area for safety reasons. This should extend outside of one local authority. It is important that local authorities work together in order to tackle housing and homelessness with a trauma-informed, needs led, strengths-based approach.

**Q4.** Should elements of the adequate housing framework apply to the owner-occupied sector?

- Yes
- No
- No views
- Don't know

If so, how can this be made to work in practice and what issues require further consideration?

No views

**Q5.** In your view, would the proposal to require Welsh Ministers to produce a housing strategy help progress towards ensuring access to adequate housing for people in Wales?

- Yes – it would have a positive impact
- No – it would have a negative impact
- No impact
- Don't know
- No views

Please explain your reasoning.

Yes, but this needs to come with actions rather than an over reliance on updates.

**Q6.** Should there be a requirement on Welsh Ministers to draw on the seven factors of housing adequacy when drafting the strategy?

- Yes – there should be such a requirement
- No – there should not be such a requirement
- Don't know
- No views

Please explain your reasoning.

Yes

**Q7.** How often should Welsh Ministers be required to review the strategy?

- Every year

- Every 2-3 years
- Every 4-5 years
- There should be no such requirement
- Don't know
- No views

Please explain your reasoning.

Every 2-3 years. This will enable issues to be seen earlier and actions to be taken as a result of reviews.

**Q8.** How often should Welsh Ministers be required to report on progress on delivery of the strategy to the Senedd (Welsh Parliament)?

- Every year
- Every 2-3 years
- Every 4-5 years
- There should be no such requirement
- Don't know
- No views

Please explain your reasoning.

Every year. This will enable proper scrutiny of actions taken.

**Q9.** Do you agree rent data should be collected at a local level by Rent Smart Wales (e.g. ward or postcode)?

- Yes
- No
- Don't know

Why?

Yes, this will enable analysis of affordable rents.

**Q10.** Other than those already outlined, are there any other principles or objectives that should be considered in developing how rent information should be provided to RSW?

**Q11.** Do you think spatial mapping of amalgamated rent data is useful and should be made publicly available?

- Yes
- No
- Don't know

Why?

Yes, this will allow organisations and individuals to scrutinise.

**Q12.** Do you think there should be a mechanism to challenge a rent increase?

- Yes
- No
- Don't know

Why?

Yes, renters should always be able to challenge unaffordable rents and should have the support and guidance in order to confidently do so.

**Q13.** Do you think license holders should be required to complete an Annual Property Condition Record?

- Yes
- No
- Don't know

Why?

Yes, this will ensure that accommodation is suitable and adequate.

**Q14.** In your view, what information should be included in the Annual Property Condition Record? For example, should rent data be collected by the Annual Property Condition Record?

N/A

**Q15.** Are there any other groups of people who have not been identified in the eligibility criteria who should be considered? Please specify any groups who have not been identified in the proposed eligibility criteria.

N/A

**Q16.** Do you think permitted payments would support people with pets to access the PRS?

- Yes
- No
- Don't know

Why?

Pets are an important part of a survivor's wellbeing and can play a vital role in their recovery. Financial barriers should not get in the way of this, and survivors should not need to pay an additional deposit towards this. The Dogs Trust have reported that 73% landlords have not experienced any issues with renter's that have pets.

**Q17.** Do you anticipate any positive or negative impacts which would result from this proposal?

- Yes
- No
- Don't know

Why?

Please see question 16.

**Q18.** Do you think the proposed criteria for a refund of the Land Transaction Tax higher residential rates element of the tax charge would incentive landlords and increase access to affordable PRS homes?

- Yes
- No

- Don't know

Why?

N/A

**Q19.** What period of time between the purchase of the dwelling and entering the headlease with the local authority should be provided to be eligible for a refund?

N/A

**Q20.** Do you anticipate any positive or negative impacts which would result from this proposal?

N/A

**Q21.** Do you have any further evidence or observations you wish to provide?

**Q 22:** What, in your opinion, would be the likely effects of the white paper as proposed in this consultation be on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- Do you think that there are opportunities to promote any positive effects?
- Do you think that there are opportunities to mitigate any adverse effects?



**Q23:** In your opinion, could the white paper be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

**Q24:** We have asked a number of specific questions. If you would like to make comments on other issues which we have not specifically addressed above, please use this space to report them:

Survivors need to be able to feel safe in their own home, and the right to adequate housing should be an opportunity to cement that. However, Welsh Women's Aid are concerned that this proposed right does not go far enough. The United Nations lay out further rights under the right to adequate housing that the Welsh Government have failed to pick up. The paper starkly lays out the link between adequate housing and violence against women and girls. The same report highlights the fact that women "represent an important proportion of those who are inadequately housed". An approach to the right to adequate housing therefore, must consider the additional barriers that women face, particularly survivors of VAWDASV. Yet, violence against women, domestic abuse and sexual violence is not mentioned once in the white paper. This is concerning.

Survivors with No Recourse to Public Funds (NRPF) are further disenfranchised from receiving support in accessing safe and adequate housing. The right to adequate housing in Wales should include supporting survivors with NRPF and ensuring that they have safe and adequate housing. There is a lack of implementation of ensuring that survivors of NRPF are cared for and supported by local authorities. This includes ensuring that they have safe and adequate housing. We are significantly concerned that if local authorities do not accept their duties under section 35 of the Social Services and Well-being (Wales) Act 2014, many survivors will be left with no other option but to return to their perpetrator. Strengthening the right to adequate housing in Wales can ensure that all survivors have access to safe housing.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: