



POLICY AND RESOURCES SCRUTINY COMMITTEE – 30TH SEPTEMBER 2014

SUBJECT: HOUSING SOLUTIONS: SOCIAL LETTINGS AGENCY

REPORT BY: INTERIM CHIEF EXECUTIVE

1. PURPOSE OF REPORT

- 1.1 To report on the implications associated with the changes to homelessness prevention duties and to seek Members' support in respect of the creation of a Social Lettings Agency. A Cabinet decision is required in respect of the options outlined in the report and consequently the views of Policy and Resources Scrutiny Committee are first being sought.

2. SUMMARY

- 2.1 This report considers the Housing (Wales) Bill and its implications for the Authority in respect of its responsibilities for homelessness prevention, registration and licensing of Private Sector landlords and the options available for the utilisation of some of the Authority's public and private sector empty properties.
- 2.2 In relation to the activities already in place to address the forthcoming legislation the report puts into context the pressures on the Authority to provide a safe, affordable home and proposes the widening of housing options to include a Social Lettings Agency.
- 2.3 The new legislative requirements will place pressures on the Authority when discharging its statutory homelessness duties. The report provides a local context in which the opportunities and threats to this sector are presented.
- 2.4 In relation to empty properties in the private sector the report makes reference to the report presented to the Caerphilly Homes Task Group on 13th March 2014 in which the extent of the problem together with the Authority's activities and performance in respect of any direct action with empty homes was detailed.
- 2.5 Access to affordable housing has become hampered by the reduction in housing supply and the implementation of the Welfare Reform Act for many of the residents in Caerphilly where home ownership is not an affordable option. The report also considers the impact of welfare reform and the limitations it presents for access to the private rented sector.
- 2.6 The report, in attempting to address the issues outlined above, provides Members with options as follows:
- Making Incentive payments to Letting Agents and Private Landlords.
 - Utilising the Services of an External Lettings Agency
 - Creating an In House Social Lettings Agency.

3. LINKS TO STRATEGY

3.1 In tackling homelessness we aim to improve access to suitable and affordable housing and this links to the following strategies:-

- Caerphilly Delivers, Single Integrated Plan (Prosperous Caerphilly - P2) - Improve standards of housing and communities, giving appropriate access to services across the County Borough.
- Caerphilly CBC Corporate Plan 2014/15 – Improvement Object 6: - *“We want to prevent homelessness wherever possible by working collaboratively with a range of partners to provide a holistic homelessness prevention service”.*
- Local Housing Strategy Aim 1: To reduce the incidences of homelessness and repeat homelessness, and to eliminate rough sleeping &
- Local Housing Strategy Aim 10: To promote the growth of a private housing sector that is healthy, vibrant and well managed.
- 2014/15 Caerphilly Homes Service Plan.
- Caerphilly CBC Private Sector Housing Renewal Policy

4. DEVELOPING A HOUSING SOLUTIONS MODEL

4.1 THE HOUSING (WALES) BILL

4.1.1 Welsh Government announced in the Homes for Wales white paper that it will be developing a new joined up approach across the whole housing sector which will introduce new legislation, market interventions and new statutory housing responsibilities for Wales. The new approach will introduce duties to collaborate and cooperate across all housing sectors and a substantial change will come with the enactment of the Housing (Wales) Bill, anticipated to become law in April 2015.

4.1.2 The Housing Bill, laid before the Assembly in November 2013, includes proposals to:

- Regulate the private rented sector by introducing landlord registration and accreditation with associated penalties for failure to do so.
- Take all reasonable steps to prevent or relieve homelessness for anyone at risk of homelessness within 56 days.
- Provide local authorities with a power to discharge its homelessness duties into the Private Rented Sector (PRS).
- End the ‘intentionality’ test for homeless households with children by 2019
- Remove the duty of housing owed to ex-offenders on release from prison who have no fixed abode, unless they are vulnerable
- Introduce a new duty to house rough sleepers

4.1.3 The new homelessness legislation intends to introduce a ‘Housing Solutions’ approach that will ensure that homeless households will have suitable accommodation available to them for at least 6 months. The Chartered Institute of Housing (CIH) acknowledges that with a lack of social housing and new development, there is an increasing demand for private rented properties and that Wales will continue to depend on the PRS to meet the growing need for housing. In their recent paper, the CIH reminds local authorities of the need to recognise the contribution of the PRS locally and to ensure that it is embedded into Local Housing Strategies. This focus should include the work on wasted empty homes and the measures that are needed to bring them back into use.

4.1.4 The legislative changes due to be introduced with the enactment of the Housing Bill in April 2015 will also bring about a change to the definitions of the national statistics for homelessness. Authorities in Wales have been made aware through the national Homelessness Network that the new performance indicators will require Authorities to report on the number of cases where the risk of homelessness has been prevented i.e. where the Authority has assisted the client to remain in suitable housing or to access suitable, affordable

accommodation prior to the client actually becoming homeless.

4.2 **HOMELESSNESS AND THE PRIVATE RENTED SECTOR**

4.2.1 In a report published by Shelter Cymru (Feb 2014) concerns were raised about the ability of the PRS to meet the needs of homeless households once the power to discharge the homelessness duty into the PRS becomes available. According to the Shelter report, the ending of a PRS tenancy is the second highest cause of statutory homelessness in Wales and via wider research into the discharge of homelessness duty into the PRS in England, they suggest there are worrying implications for the changing homelessness policy in Wales.

4.2.2 Some of the key problems identified in the Shelter report concerned the lack of tenancy support when things had gone wrong with a PRS tenancy. Homeless households receive varying levels of support whilst in receipt of homelessness services but once duty is discharged, the support provision invariably ends, largely due to financial constraints. Vulnerable people whose housing duty had been discharged into the PRS who were already facing specific social and health challenges found it harder to cope with a PRS tenancy. Homeless households who were housed in the PRS found the sector expensive to access and perceived that their PRS tenancy could be ended at short notice.

4.2.3 Shelter Cymru support a series of measures to ensure that the new power to discharge a homelessness duty into the PRS should be underpinned by core values if tenancies in the PRS are to be sustainable:

- Tenancies need to be a minimum of 12 months in length to ensure that some measure of stability is given to the household
- PRS properties must be free of all Category 1 Hazards. This means that local authorities must inspect before it is offered to a homeless household
- Support for tenants accessing the PRS must be improved; the needs of the service user must be considered and support must be accessible should it be needed for longer than 6 months
- Where possible, re-engagement with households should be in place to ensure the accommodation continues to be suitable
- Households should be able to access assistance to get essential furnishings, such as through the use of the Discretionary Assistance Fund
- Wider access to financial assistance should be provided such as through homeless prevention funds. (We currently deploy some £25k/annum by way of loans)
- Authorities should ensure PRS accommodation is affordable: homeless households should not be housed into properties with unaffordable rent and household bills.

4.3 **THE LOCAL PRIVATE RENTED SECTOR**

4.3.1 Over the past 7 years, the Caerphilly Private Landlord Forum has been active within the county borough, with the aim of sharing information and advice for landlords with rental properties in our area. The Authority supports the Forum and its Chair is an experienced local landlord and resident. Many partnerships have developed over the course of the Forum's life that have resulted in better lines of communication between landlords and our Housing Benefits Section, Environmental Health and Housing Advice Teams.

4.3.2 In the 2011 census, it was reported that 48% of PRS tenants in the Caerphilly borough were in receipt of housing benefit and we know anecdotally that rent levels in the sector have increased in line with general housing costs, but also through market forces of supply and demand. There is also limited access to the PRS for single persons under 35 in particular as it is not an affordable option.

4.3.3 There is currently no legal requirement for private landlords to register themselves or details of their properties with the Authority. However, over the past few years, communication through newsletters, accreditation training events and most recently a new Caerphilly Private Landlord website has improved access arrangements. The Housing (Wales) Bill will introduce

the requirement for all PRS landlords to register and those landlords and agents who intend undertaking management responsibilities must be licensed. However, until this becomes a legal requirement there will be no reliable data on the number of PRS landlords and properties in the County Borough.

- 4.3.4 Whilst we know that approximately half of the PRS tenants in the borough are in receipt of housing benefit, the Data Protection Act prevents the sharing of landlords' details with other departments. Unfortunately many landlords come to the attention of the Authority following complaints from tenants and it is evident that many landlords continue to be ignorant of the laws on tenancies, housing conditions and their responsibilities as landlords. Whilst the new powers to register/license landlords will assist us in working with landlords ignorant of their responsibilities, there is also the possibility that PRS landlords may exit the rental market should they consider their new liabilities as being burdensome.
- 4.3.5 Affordability is a major barrier to access the PRS: whilst rent levels vary across the county borough area, depending on location and property size, the majority of landlords and letting agents require one month's rent in advance and an equal amount for a bond/deposit (lettings agencies also charge an administration fee in advance, approximately £200). For a tenant to secure a typical £500pcm rental property, at least £1000 is payable in advance. If the tenant is in receipt of housing benefit, payment may take some weeks to process and, therefore, the rent account will be in arrears at the very start of the tenancy.
- 4.3.6 Assisting tenants to access the PRS through rent in advance payments and through the Caerphilly Bond Scheme has been the practice for several years. However, our Homelessness Prevention officers are increasingly reporting that local letting agents are less likely to grant a tenancy to a household in receipt of housing benefit without a guarantor. Although no research has been carried out, it is likely that the reduction of the Local Housing Allowance rates generally, plus the reduction of benefit for single people under 35yrs has exacerbated this problem.
- 4.3.7 From 2008 PRS landlords were no longer entitled to receive housing benefit payments directly unless their tenant had either become over 2 months in arrears or was considered to be vulnerable and less able to manage their financial affairs. In order to continue to support both landlords and tenants a partnership with the Caerphilly Private Landlord Forum, Smart Money Credit Union and the Housing Benefits section has been set up to facilitate direct payments with the agreement of tenants to PRS landlords. Take up by landlords to date has, however, been limited.

4.4 **ORGANISATIONAL THREATS AND OPPORTUNITIES**

- 4.4.1 Through partnership working with Supporting People and other local social housing providers the Authority has been proactive in developing interim accommodation for homeless families, homeless single people and homeless young people. The expectation of these service users is that social housing will be made available for them in the area and property type of their choice, either within the Authority's stock or through the nominations process with the partner social landlords. There is already existing pressure on all social housing landlords demonstrated by long general housing needs waiting lists, without the additional burden of the numbers of homeless households who are owed a duty of housing by the Authority.
- 4.4.2 Without an additional source of housing available to the Authority, those temporarily accommodated in emergency B&B and interim accommodation will remain in their respective accommodations for lengthy periods. To illustrate this there are currently 25 homeless single people in emergency B&B emergency accommodation, and whilst not all of them will be owed a duty of housing, the Authority does have a duty to provide them with emergency accommodation whilst statutory homeless investigations are undertaken. Even when homelessness investigations have been completed, until such time that a suitable social housing property becomes available, service users will remain in B&B. The same delay described here is replicated for every service user housed in our various other temporary accommodation units. In addition, where the Authority gives preference in its allocation of

social housing to priority groups such as homelessness service users, the general needs waiting list service users are also detrimentally affected by the resultant longer waiting times.

- 4.4.3 For a number of months, a dedicated Homelessness Prevention officer has been assisting households threatened with homelessness to remain in their existing accommodation or to access PRS accommodation through the provision of advice and assistance. Financial assistance has been given through our Homelessness Prevention Fund (a repayable rent in advance scheme) and referral to the Caerphilly Bond Scheme. Through this approach, the Authority can help to prevent households presenting as homeless and subsequently requiring the emergency accommodation as described above. However, it has become apparent that some of the households initially assisted and prevented from becoming homeless are returning for our assistance because they are again under threat of homelessness. It is apparent, therefore, that to achieve realistic housing sustainability in the PRS, tenancy support is essential.
- 4.4.4 The WLGA in association with the Homelessness Network in Wales have developed a series of PRS toolkits to enable local authorities to prepare for a new housing solutions approach to make the best use of the PRS. It is felt that the partnerships already in place and described in previous sections of this report give the Authority's Homelessness Prevention team a strong starting point to take advantage of the PRS Toolkits. However, it is also felt that alternative housing solutions now need to be developed.

4.5 **SOCIAL LETTINGS AGENCIES**

- 4.5.1 Social Lettings Agencies (SLA) already exist across Wales, operated either by in-house Local Authority Teams, Housing Associations or Third Sector Organisations. Research into the effectiveness of existing SLAs was undertaken by the WLGA in 2013 and an Advice Note has been published to assist strategic housing authorities in developing SLA's in areas where such a housing need has been identified. The WLGA report identified the following essential features of a successful SLA:

- Provision of affordable accommodation with rents set at local housing allowance rates or below
- Being free to tenants at the point of access (no administration fees)
- Affording priority to people in housing need or on low incomes
- Providing good quality accommodation
- Promoting sustainability for both tenants and landlords
- Providing a responsive and supportive management service to tenants
- Being geared to access higher levels of support for tenants where needed

To secure the above features, Authorities considering developing an SLA should also:

- Be market aware
- Recognise the PRS as a valuable resource to assist in the delivery of housing services
- Be able to source property in the right areas to meet housing need
- Have a clear social purpose
- Be open and transparent

- 4.5.2 However hard the Authority tries to promote the use of the PRS as a realistic housing opportunity, there are preconceptions held by both landlords and tenants. For PRS landlords the changes to the housing benefit system of direct payments, reduction in actual housing benefit amounts paid, plus the forthcoming requirement to become accredited and licensed may be a "bridge too far" and there is concern that some PRS landlords may cease providing tenancies to benefit dependant tenants, or even leave the sector all together. As previously suggested, local intelligence informs us that certain letting agencies within the County Borough will no longer accept benefit dependant tenants without a guarantor. This, together with agency fees and the need to have finance available in advance creates serious barriers for many households attempting to access the PRS.

4.5.3 For many people the PRS provides flexibility and choice but those seeking social housing want security of tenure, which is only currently available through home-ownership or via a social housing tenancy. Unfortunately, the Authority has found many instances reported by PRS tenants where, through their lack of awareness of tenants' rights, their lack of understanding about security of tenure and protection from eviction tenancies have ended needlessly. Many tenants reporting to the Housing Advice Centre have left PRS tenancies owing rent, without giving proper notice to the landlord and have failed to report repairs in a timely manner. There is, therefore, as much ignorance in respect of tenants' responsibilities to their landlords as there is of landlords' responsibilities towards their tenants. Some of these issues will, however, be addressed by the forthcoming Renting Homes Bill. The Renting Homes Bill is scheduled for introduction in 2015 and will provide a clearer, simpler and more straightforward legal framework for renting a home.

4.6 **OPTIONS**

4.6.1 In going some way to address the problem of an undersupply of affordable housing within the private rented sector there are potentially 3 options for Members consideration:

1. Provide incentive payments to existing Letting Agents and Private Landlords.
2. Utilise the Services of an External Social Lettings Agency.
3. Develop an In-House Social Lettings Agency.

4.6.2 **Option 1 - Incentive Payments**

The Authority has never undertaken any activity whereby incentive payments have been made to private sector landlords or Letting Agencies in an effort to secure affordable accommodation for tenants in need. Indeed, to do so when the quality of accommodation, management capabilities of a landlord and level of ongoing tenant support are unknown is questionable. Also, to consider an option such as this would warrant the creation of a funding source adequate for the purpose. There is currently no budget provision to support an initiative such as this, nor is there scope to redeploy funding from other areas of the General Fund budget for Homelessness/Housing Advice to support such activity.

4.6.3 **Option 2 - External Social Lettings Agency**

Seren Living, a branch of Charter Housing operates an external Social Lettings Agency. The Agency is based in Newport and, having operated reasonably successfully in the Newport area for several years extended their scheme to operate within the Caerphilly County Borough area in 2012. Notwithstanding the efforts made by Seren Living, factors such as their Newport location, their operating practices and the different characteristics of the private sector in the Newport area, have seen the Organisation achieving only limited success within our County Borough.

As part of a wider investigative study into the private rented sector, the WLGA in 2013 commissioned housing consultants Anne Delaney and Associates to undertake a specific review of Social Lettings Agencies across Wales. Their findings were critical of many external Social Lettings Agencies, particularly in respect of their operating practices. Many created significant barriers on affordability grounds by charging administration fees, and at others the protection of the landlord often appeared to take priority over the needs of the tenant. Quality of accommodation is also an issue as Local Authorities do not have control over the accommodation utilised by External Social Lettings Providers.

In a local context, the Consultant's report showed Seren Living having only acquired some 8 properties for social letting within Caerphilly whilst Cartrefi Hafod Housing Association also had limited success, having secured just 1 property for social letting within the County Borough. The performance of external Social Lettings Agencies, with certain exceptions, has been shown, therefore, to be extremely inconsistent and in many cases fails to deliver the affordable housing services demanded by Local Authorities.

4.6.4. **Option 3 - In-House Social Lettings Agency**

The development of an In-House SLA can provide opportunities for existing PRS landlords and property owners wishing to become landlords (such as owners of empty property) to rent out their properties through the Authority. The Agency would provide an additional supply of housing, matched to tenants' needs and affordability, with a property management service to facilitate appropriate discharge of the Authority's duty to house those in need. The Agency would cater for service users unable to access traditional PRS properties supplied by letting agents and other PRS landlords where currently barriers exist.

Through the existing Caerphilly Private Landlord Forum we already know there is a desire from landlords to work more closely with the Authority and provide such a service. For owners of empty properties, an In-House Agency option would provide a mechanism for property owners to become landlords through the Authority at arm's length. For prospective tenants, such as those threatened or who are actually homeless, the Agency would provide a wider choice of property type often in areas not traditionally used for social housing.

An In-House, Caerphilly Social Lettings Agency would operate in a similar manner to a traditional high street agent, however, its services would be tailored to ensure that the agency operates for the benefit of would-be social housing tenants in that:

- The agency would be operated on a not for profit basis and income generated would be used to offset operational running costs and/or be reinvested back into the service.
- Rent levels would in all cases be set at Local Housing Allowance rate, based on the number of bedrooms. This is to ensure that prospective tenants in receipt of benefits will be able to afford the rent and sustain the tenancy.
- The Council would advertise available properties initially on standard 6 month assured short-hold tenancy agreements, which will have the option to extend.
- Administration fees usually paid by prospective tenants would not be charged.
- A tenancy support service would be provided for each new tenant and would continue for as long as the support is needed to ensure the tenancy is sustainable.
- Credit Union accounts would be opened for each new tenant to facilitate direct benefit payment to the Agency and to promote access to all facilities offered to Credit Union members.
- Landlords from the PRS would be registered with the Council and would be assured of a full tenancy management service at a cost of 8% of the rental income. Landlords with properties managed by the Council's Social Lettings Agency would not be required to become accredited/licensed landlords: the Social Lettings Agency will be the accredited/licensed Agency as required by the Housing (Wales) Bill 2015.
- The Agency would operate in compliance with the Equalities Act 2010 and guidance there under to ensure that any practices currently observed in the PRS that may be unfair and discriminatory towards tenants do not prevail.

A model such as this has already been developed at Carmarthenshire County Council and in the 5 years since its inception has built up a portfolio that currently stands at some 153 properties.

5. EQUALITIES IMPLICATIONS

- 5.1 No Equality Impact Assessment has been undertaken on this report however the Agency would operate in compliance with the Equalities Act 2010 legislation and guidance, to ensure practices currently observed in the PRS that are unfair and discriminatory towards tenants do not prevail.
- 5.2 Where possible adverse impacts are identified, such as where disability issues and the numbers of bedrooms in the property are a factor, the Social Lettings Agency will be able to assist such potentially disadvantaged groups with the opportunity to access appropriate and affordable housing options, given the expertise that will be immediately available or via

signposting to prospective tenants.

- 5.3 The Principal Housing Officer (Housing Portfolio) has worked with the Senior Policy Officer (Equalities and Welsh Language) and private landlords to develop a set of Equalities guidance that is currently being consulted upon that will help landlords and tenants understand the relationship between the two areas.

6. FINANCIAL IMPLICATIONS

- 6.1 **Option 1** – There is currently no budget provision to support an initiative such as this, nor is there scope to redeploy funding from other areas of the General Fund budget for Homelessness/Housing Advice. To pursue this option, therefore, would require a new funding source to be identified.
- 6.2 **Option 2** – There are normally no financial implications for the Authority in respect of this option. However, there is the potential for certain prospective tenants to need assistance with funding for bonds and/or rent in advance which in appropriate cases the Authority would support.
- 6.3 **Option 3** - The creation of an In House Social Lettings Agency would necessitate the appointment of a Manager together with Clerical Support. Tenancy Support can be provided from within existing resources by way of support from staff currently undertaking tenancy support within Public Sector Housing.
- 6.4 The Agency would also need an ICT database, which would cost approximately £10,000 per year (for the software, design, licence and support) although the final costs would be subject to the outcome of procurement processes. The IT system would provide an Account Management tool, website advertising for prospective tenants, produce maps and information on transport links and have a system of recording satisfaction surveys and property maintenance reports.
- 6.5 The actual financial implications would, therefore, be in respect of a Grade 9 Manager post (£40,598 inclusive of on costs), Clerical post (£20,323 inclusive of on costs) and ICT database (£10k). Totalling approximately £71,000.
- 6.6 Welsh Government has, however, announced that Transitional funding will be available from April 2015, (albeit reducing year on year for 3 financial years) to help Local Authorities discharge the additional Homelessness duties brought about by the Housing (Wales) Bill. Indications as far as CCBC is concerned suggest funding of some £290k will be available in year 1, £190k in year 2 and approximately £110k in year 3. Participating Landlords will also be asked to pay the Authority 8% of their rental income as a contribution towards the full tenancy management service provided by the SLA.

The Transitional funding will be sufficient to cover the setting-up costs of the Agency and this, together with the income from the establishment of a comprehensive housing portfolio, is such that the Agency could expect to be self-financing by year 3 of its operation.

7. PERSONNEL IMPLICATIONS

- 7.1 The scheme would warrant the appointment of a Manager and Clerical Assistant as outlined above. The Manager would probably need to be recruited by way of advert but other staff requirements could be met from within existing teams and the redeployment pool. Staff would, however, be appointed initially on a fixed term basis to allow for a review of the Agency service to ensure it successfully meets its objectives. A further report will then be submitted to determine the future of the service.

8. CONSULTATIONS

- 8.1 All comments from consultees have been incorporated into the report.

9. RECOMMENDATIONS

- 9.1 That Policy and Resources Scrutiny Committee considers this report and recommends to Cabinet that Option 3. i.e. the development of an In-House Social Lettings Agency as outlined in para 4.6.4 above be implemented.
- 9.2 That a further report outlining progress to date and the performance of the Social Lettings Agency be submitted to Policy and Resources Scrutiny Committee within 12-18 months of its commencement.

10. REASONS FOR THE RECOMMENDATIONS

- 10.1 In consideration of the options outlined in para 4.6 officers consider that;

Option 1 – There are currently no funding opportunities to support this Option and the opportunities to develop such an initiative to a level whereby it would form a useful, strategic element of the Homelessness/Housing Advice service, capable of assisting the Authority in adequately discharging its future housing duties are extremely limited.

Option 2 - Recent research and first hand experience in respect of current working arrangements with External Social Lettings Agencies indicate that this option would not deliver sufficient numbers of properties to assist the Authority in adequately discharging its future housing duties.

Option 3 – This Option offers a strategically planned, affordable, tried and tested model in which private sector landlords could have confidence. It would ensure the Council could comply with the additional burden of the Housing (Wales) Bill 2015, once enacted, by providing sufficient additional units of suitable, affordable housing for residents who are homeless or at risk of becoming homeless.

11. STATUTORY POWER

- 11.1 Housing Act 1996 as amended by the Homelessness Act 2002.

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Consultees:

- Cllr Gerald Jones - Deputy Leader & Cabinet Member for Housing
- Cllr Hefin David – Chair Policy and Resources Scrutiny Committee
- Cllr Sean Morgan – Vice-Chair Policy and Resources Scrutiny Committee
- Nicole Scammell - Acting Director of Corporate Services.
- Shaun Couzens - Chief Housing Officer
- Graham North – Public Sector Housing Manager
- Kenyon Williams - Private Sector Housing Manager
- Paul Smythe - Housing Repair Operation Manager
- Rhys Lewis - Systems & Performance Manager
- Lesley Allen - Principal Accountant
- Fiona Wilkins - Principal Housing Officer (Private Sector)
- Allan Elliott - Principal Housing Officer (Agency)
- Malcolm Topping - Supporting People Manager
- Mark Jennings - Housing Strategy Officer
- Gail Williams – Interim Head of Legal Services

Sandra Isaacs – Rents Manager
Area/Neighbourhood Housing Managers
David A. Thomas, Senior Policy Officer (Equalities and Welsh Language)

Background papers:

The report to the Caerphilly Homes Task Group on Empty Homes (13th March 2014)

WLGA Report on Social Lettings Agencies – available on the WLGA Website

Appendices:

Appendix 1 Equality Impact Assessment Form – The Creation of A Social Lettings Agency