



promoting equality in housing
hybu cydraddoldeb ym maes tai

Tai Pawb

Response to:

A new rent and service charge standard for Wales

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Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's purpose is, "To Inspire Wales to be a Fairer Place to Live" with a mission to promote equality and social justice in housing in Wales. It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector.

For further information visit: www.taipawb.org

Charity registration no. 1110078

Company No. 5282554

1 Introduction

- 1.1 Tai Pawb welcome the opportunity to respond to this consultation on rent and service standards for Wales. We've participated in Welsh Government working groups and are pleased to see the progression of the proposals.
- 1.2 Our response provides an overview to the key questions posed in consultation, focusing on equalities considerations and have engaged with stakeholders and members. We recognise rent policy is a complex area, with a need to balance a number of competing priorities. Overall, we feel the proposals have the potential to deliver this compromise in the majority of areas discussed.
- 1.3 However, we are concerned by the potential for 'warm rents' and the negative impact these could have on tenants. We base these insights on a recent Tai Pawb and Open University collaboration on [decarbonisation and tenants voices](#). Moving forward, we believe this highlights the need for enhanced participation in all forms of housing policy, strategy, and legislation.

2 Background

- 2.1 Social homes provide 16% of all housing in Wales. For many they are essential in making housing affordable, preventing poverty, and providing a solid foundation to live and enjoy further opportunities.
- 2.2 Rent and Service charges are essential income for housing associations. Not only do they contribute to maintaining homes and communities, but they also help fund valuable tenant support. Tai Pawb believe we need more social homes. As a society we also need to decarbonise our existing housing stock, which is amongst the oldest in Western Europe. Housing makes up 11% of carbon emissions in Wales and to meet our existing decarbonisation commitments, we must retrofit as well as have more carbon neutral homes . Investment is required to achieve this, so

it's unsurprising discussions around 'warm rents' are part of the consultation. However, we believe we must be careful with how we as a nation fund our decarbonisation plans, to ensure that the costs are not passed on to vulnerable households.

3 Rent and Service Charge general principles

3.1 We are supportive of the desire for a consistent approach to rent and service charges across Wales. Based on the consultation questions:

- Tai Pawb support the adoption of the principle contained in the paper and feel this balances the needs of tenants and housing associations (Q2).
- Tai Pawb believes that the new social rent policy should apply for 10 years. This will allow for a longer-term approach and consistency with England. However, we believe mechanisms should be built in to allow for a review over this period should there be unexpected inflation/deflation (Q4).
- Tai Pawb support the parameters of Welsh Ministers involved in rent setting under the existing arrangements (Q6).
- Tai Pawb are supportive of the idea to continue to use CPI based on September as it matches when UK Welfare/minimum wage is reviewed. (Q7).
- Tai Pawb are supportive of the proposal to retain landlord flexibility at current rates (Q8).
- Tai Pawb agree to maintain current parameters of general needs and retain the existing exemptions (Q11).

4 Service Charges and the need inclusive communication and participation

4.1 Tai Pawb welcome the proposals around service charges, which we feel balances needs of housing associations and tenants. However, housing associations will need guidance and support to ensure tenant voice

participate in setting these and what the income generated should be spent on. This engagement and participation should ensure that communication is clear, transparent, and accessible to all. For instance, people with neurodiversity or people whose first language is not English or Welsh. Our [Good Practice Guide](#) to The Renting Home Act highlights the following around engagement:

- The importance of tenant data in guiding engagement
- Using community languages
- Using social media platforms
- Face-Face conversations
- Newsletters
- Easy read versions of consultation
- Audio/Visual explanations

5 Warm rents and the need for tenant participation

5.1 Earlier this year, Tai Pawb and the Open University published [research](#) on a fair and equitable transition to decarbonising social housing. This research interviewed twenty-three social housing tenants and eleven practitioners to understand the impact on decarbonisation on them.

5.2 Some tenants found the process of decarbonisation positive, with money saved as well as making a difference to the environment, being key benefits. However, not all findings from the perspectives of tenants were positive. Challenges included:

- Bills increasing rather than decreasing
- Properties becoming too hot in the summer due to the level of insulation, in particular affecting disabled or older people.
- Lack of understanding how to use new technologies to get the maximum benefits.
- Inconsistent levels of support from housing associations led to differing satisfaction rates with the changes.

- Continued challenges around Damp, Mould and Condensation leading to heating being kept off in the winter, but costly tumble dryers used instead.

5.3 Given this feedback, there is a danger that ‘warm rents’ become a blunt instrument, especially as our research suggests some tenants have actually experienced higher bills, rather than lower. Social housing is key in addressing poverty – so the concern here is that some groups most at risk of poverty are required to contribute a greater share of the cost of decarbonisation. As fuel prices are susceptible to global events, a crisis could lead to even higher fuel bills that push people into poverty.

6 Conclusion

6.1 Tai Pawb welcome the opportunity for this consultation and recognise the importance and consistency it will provide to both tenants and housing associations in the long-term.

6.2 While we welcome the majority of proposals in the consultation, we feel further tenant participation is essential in a small number of areas; namely implementation of changes around service charges and ‘warm rents’. We believe it necessary that engagement does not stop with this consultation but continues throughout the implementation of changes. This is particularly important in relation to ‘warm rents,’ where we believe there needs to further review, consideration and action based on the experiences of tenants.

6.3 Tai Pawb look forward to working with the Welsh Government, housing associations and tenants in implementing these changes.