



Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

## **NEATH PORT TALBOT COUNTY BOROUGH COUNCIL**

### **Social Care Health & Well-being Cabinet Board**

**5 July 2021**

### **Report of the Head of Adult Services - A. Thomas**

#### **Matter for Decision**

**Wards Affected:** All wards

#### **NEATH PORT TALBOT COUNCIL AND TAI TARIAN CONSULTATIVE DRAFT SHARED LETTINGS POLICY 2021**

#### **Purpose of the Report**

To inform Members of the Neath Port Talbot Council & Tai Tarian Consultative Draft Shared Lettings Policy 2021, attached at Appendix 1 and seek approval to subject it to a 90-day public consultation exercise.

#### **Executive Summary**

The Council and Tai Tarian are required to periodically review their shared housing lettings policy and the most recent joint review has just been completed. The consultative draft policy, a copy of which is attached at Appendix 1, now needs to be the subject of a public consultation exercise.

#### **Background**

Following housing stock transfer in 2011, the Council retained its role as the Local Strategic Housing Authority. In that role, the Council has the legal responsibility to formulate, adopt, and amend an allocation scheme and where appropriate, consult on proposed changes to it. Under the 2010 transfer agreement, a Shared Lettings Policy between the Council and Tai Tarian (then NPT Homes) was therefore agreed and both now share that ongoing responsibility for alterations or changes to the Joint Lettings Policy, including its periodic review.

## **The Review**

The last periodic review of the Policy was completed in 2015 and the current review process began in 2017. This review was more comprehensive than the last and so was not substantially completed until early 2020. The Covid-19 pandemic then prevented the necessary further work to complete the process taking place until very recently.

The consultative draft Policy attached at Appendix 1 is consequently not likely to require further significant revision for some time to come and it has therefore been decided that the Policy will only be routinely reviewed every 5 years in future.

It is however acknowledged that there may be need to undertake an ad-hoc review, following any substantial changes in any relevant legislation or guidance, or any other emerging factor that impacts substantively on the content of the Policy or its implementation.

The general thrust of the review was to facilitate as many interested officers as possible from both organisations working together, to ensure that the content of the Policy was as reflective as possible of the operational reality of its day-to-day implementation by Tai Tarian, whilst ensuring that the role of the Policy in meeting the Council's duties under the Housing (Wales) Act 2014, as well as its wider strategic Housing objectives, continued to be optimised.

The reviewed document consequently went through numerous iterations, such that it would be extremely difficult and arguably counter-productive to attempt to outline in detail the substance of the many changes made to it, in this report.

However, In addition to the Policy itself, the following documents will be made available, as a part of the consultation exercise:

- A Summary Policy document (copy attached at Appendix 2);
- an online and hard-copy consultation questionnaire with targeted questions (copy attached at Appendix 3);
- a consultation booklet for those unable to access the Council's Consultations webpage (copy attached at Appendix 4);
- a summary Plan on a Page document (copy attached at Appendix 5); and
- an Easy-read outline of the consultation exercise (copy attached at Appendix 6)

Appendices 1 to 6 will all be made available in Welsh during the consultation exercise.

Furthermore, both Council and/or Tai Tarian officers could make themselves available for a separate consultation meeting with interested Members, during the 90-day consultation period, if that was considered necessary and helpful.

In any case, following the consultation exercise, a further report will be brought to Members outlining the final version of the Policy, as determined by consultation outcomes, and supported by a refreshed Full Integrated Impacted Assessment, similarly informed.

### **Financial Impacts**

There are no known or anticipated financial implications for the Council as result of the proposal, other than those associated with the consultation exercise itself, which are budgeted for.

### **Integrated Impact Assessment**

A first stage impact assessment was undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. This first stage impact assessment indicated that a more in-depth assessment was required.

An overview of the Full Integrated Impact Assessment outcome is set out below but it is recommended that Members read the Full Integrated Impact Assessment, which is attached to the report at Appendix 7, for the purposes of the meeting.

- “There are potential gaps in the available equalities data because the data set only relates to 10% of current applicants to Tai Tarian for housing - i.e. those applicants who chose to provide it;
- the current document is however only a consultative draft;
- it will therefore be subject to further change, following the proposed 90-day public consultation exercise;
- as part that exercise, an equalities impact question will be asked and information on the protected characteristics of respondents requested;
- there are no currently known or anticipated negative impacts on any applicant, including any by virtue of the protected characteristics of any member of their household; and
- the potential positive impacts are maximised, as far as is currently possible.”

The full Integrated Impact Assessment will be refreshed following the public consultation exercise to take into account any relevant new information provided.

### **Valleys Communities Impacts**

The policy has no spatial impact on our valleys communities and does not link to the impacts identified in the Cabinet's response to the Council's Task and Finish Group's recommendations on the Valleys.

### **Workforce Impacts**

There are no known or anticipated workforce implications associated with this proposal.

### **Legal Impacts**

The Policy has been reviewed and is to be consulted on in line with the requirements of all relevant Housing legislation and guidance.

### **Risk Management Impacts**

There are no known or anticipated risks associated with this proposal.

### **Crime and Disorder Impacts**

Section 17 of the Crime and Disorder Act 1998 places a duty on the Council in the exercise of its functions to have "due regard to the likely effect of the exercise of those functions on and the need to do all that it reasonably can to prevent:

- a) Crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment);
- b) The misuse of drugs, alcohol and other substances in its area; and
- c) Re-offending the area"

There is no known or anticipated impact under the Section 17 of the Crime and Disorder Act 1998 from the proposal contained in this report.

### **Counter Terrorism Impacts**

The proposal contained in this report is neither known nor anticipated to have any impact on the duty to prevent people from being drawn into terrorism.

### **Violence Against Women, Domestic Abuse and Sexual Violence Impacts:**

Section 2(1) of the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 introduced a general duty where a person exercising relevant

functions must have regard (along with all other relevant matters) to the need to remove or minimise any factors which:

- (a) increase the risk of violence against women and girls, or
- (b) exacerbate the impact of such violence on victims.

The proposal contained in this report is neither known nor anticipated to have any negative impact on the above duty.

### **Consultation**

The consultative draft document is to be the subject of a public consultation exercise as is required.

### **Recommendations:**

It is recommended that Members grant permission for Officers to undertake a 90-day public consultation exercise on the consultative Shared Lettings Policy 2021 attached at Appendix 1.

### **Reasons for Proposed Decision**

To ensure that the Council & Tai Tarian comply with their shared responsibility to periodically review their Shared Lettings Policy and subject the reviewed document to public consultation.

### **Implementation of Decision**

The decision is proposed for implementation after the three day call-in period.

### **Appendices:**

#### Appendix 1

Consultative Draft Neath Port Talbot County Borough Council & Tai Tarian Shared Lettings Policy 2021.

#### Appendix 2

Policy Summary

#### Appendix 3

Consultation Questionnaire

#### Appendix 4

Consultation Booklet

Appendix 5  
Plan on a Page

Appendix 6  
Easy-read

Appendix 7  
Integrated Impacts Assessment

**List of Background Papers**  
None

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