

The term assessment needs to be defined clearly so that no duty is placed on the LA to carry out a full assessment when they first approach the LA. As mentioned previously the emphasis is on prevention.

The Act includes an adaptation of the term in need for those leaving prison, historically dealing with a high volume of prison leavers has placed an additional burden on LAs and the assessment of vulnerability is welcomed. A clear guidance on the definition of vulnerable is required to avoid different interpretations from various organisations.

HB 41

Supporting vulnerable families is important but an assessment of why the family have been made homeless is important to ensure that the family themselves have not contribute directly to their situation, for example, non payment of rent.

Co-operation with our Social Landlords is important and the Act acknowledges this which will make the relationship stronger. Establishing expectations as part of the Act would avoid confusion

It is important to state the contribution made by other establishments to the process, especially probation, health boards and social services. The appropriateness of accommodation does not mean that support services are not required to assist and maintain the tenancy.

- **a duty on local authorities to provide sites for Gypsies and Travellers where a need has been identified**

We are working with other LAs in North Wales so that the needs of Gypsies and Travellers are dealt with positively in respect of permanent and short stay sites.

To promote the provision it is important to ensure that sufficient resources are available to develop as well as revenue costs to manage the new sites once they are established.

- **standards for local authorities on rents, service charges and quality of accommodation;** Although we have no stock since transferring to an RSL, having consistency with rents is important as well as being affordable.

We believe that tenants would welcome this as it can facilitate arrangements to move or transfer.

- **reform the Housing Revenue Account Subsidy system**

Although we do not have a housing revenue account we support the changes in the system

- **the power for local authorities to charge more than the standard rate of council tax on homes empty for over a year**

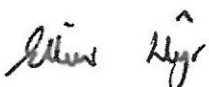
taking steps in getting an empty property back into use is important and raising a higher level of tax would be of assistance to LAs. Increasing the tax over a specific time to 200% is an option.

Second homes have an impact on communities; the impact of this can be seen in Gwynedd. In certain areas local people are unable to buy properties as they are not affordable as well as the impact of homes which are occupied for short periods have on the local community.

- **the provision of housing by Co-operative Housing Associations**

this would facilitate the provision of affordable homes as well as securing local management within our communities

Yours sincerely



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