



# Consultation Response

FROM THE EXTERNAL AFFAIRS WALES DEPARTMENT

## Welsh Government Consultation Designation of Licensing Authority under Part 1 of the Housing (Wales) Act 2014 and the intention of the training regulations which will govern the training requirements of landlords and agents

February 2015

RSPCA Cymru welcomes the opportunity to respond to the Welsh Government's consultation concerning the designation of a licensing authority under Part 1 of the Housing (Wales) Act 2014, and the intention of the training regulations which will govern the training requirements of landlords and agents.

As outlined in recent meetings with Welsh Government Housing officials, and in earlier consultation responses submitted in relation to this legislation, we have emphasised the impact which housing policies can have on animal welfare. We are continuing to work closely with the Dogs Trust in Wales on this issue. It is our belief that this legislation can play a key role in encouraging responsible pet ownership.

Indeed, some 43 percent of households in Wales own at least one animal, and many challenges are posed by the keeping of pets in private, sheltered, social and council accommodation. As such, it is vital these issues are considered as the relevant sections of the Housing (Wales) Act are implemented and progressed.

#### 4. Do you consider any other broad subject areas should be included in the training regulations as statutory requirements in a training course?

RSPCA Cymru believes training requirements and materials should include a focus on the keeping of animals within private rented housing. Such a focus could form a key role within any training regarding the contractual relationship between a landlord and a tenant and best practice in the letting and management of dwellings under a domestic tenancy.

We have worked with many social housing providers to outline the benefits of a well-enforced Pets Policy, often linked to tenancy agreements. In many circumstances, these issues are equally

applicable to private landlords, and thus should be considered when developing the requirements of training courses and materials.

Such policies may outline a tenant's legal obligations in terms of what is required of them and the consequences for failing to adhere to any such policy. They can include clear guidance on how many pets a tenant may own and any restrictions on particular species, which should depend on the suitability, style and size of the accommodation in question. Further to this, it should detail that an owner is responsible for the welfare of these animals as defined under the Animal Welfare Act (2006).

Additionally, any such policy could, for example, outline that an owner must ensure animals do not cause a nuisance or be used in an anti-social manner, include measures to tackle indiscriminate breeding and lay out conditions related to pets which may be left behind in a property. Such a policy could also outline a tenant's legal obligation in relation to microchipping and identification.

Clearly, animal welfare issues should be regarded as key in the management of a rental property and, if addressed accordingly, could potentially save the public purse significant amounts of money in tackling possible pet-related issues, which could include noise nuisance, anti-social behaviour etc.

Training could, therefore, highlight to private landlords issues they may wish to include in their tenancy agreements, the benefits of a Pets Policy, as detailed above, and procedures they may wish to be aware of to tackle common pet-related problems with lettings. Equipping private landlords, and agents where necessary, with such knowledge could avoid common problems linked to pet ownership within rental properties from escalating, whilst simultaneously promoting responsible ownership and compliance with the law, and preventing damage being caused to a dwelling.

Depending on the make-up of training schemes, the provision of relevant written materials could play a key role. As discussed with Welsh Government officials, RSPCA Cymru and Dogs Trust would be very happy to provide detailed information as to the issues, themes and legislation which should be considered with regards to pets being kept within the private rented sector. The development of a co-produced 'Best Practice Guide' could be a hugely useful tool in equipping landlords and agents with useful knowledge.

## 6. Do you agree that the licensing authority should approve/authorise training courses and training providers to deliver training??

From an animal welfare perspective, it is imperative that any direct training delivered should be administered by an appropriately qualified individual or group. We would be very happy to discuss these issues further.

## Conclusion

The mandatory registration, training and licensing of all private landlords in Wales offers a clear opportunity to tackle many problems associated with the keeping of animals within the private rented sector.

RSPCA Cymru has been very pleased to engage with the Welsh Government on these issues thus far, and, should any further information be required at this time, please do not hesitate to get in touch.

We look forward to continuing to work closely with the Welsh Government, and, if appointed, the City of Cardiff Council as the designated licensing authority, to ensure the Housing (Wales) Act meets its potential in improving standards of animal welfare within the private rented sector.