

# Report to the Executive for Decision 02 September 2019

Portfolio: Housing

Subject: Consultation: Draft Housing Allocations Policy

Report of: Deputy Chief Executive Officer

**Corporate Priorities:** Providing Housing Choices

#### **Purpose:**

To approve the draft Housing Allocations Policy for a six-week period of consultation

#### **Executive summary:**

Local housing authorities have a duty to make sure that homes, which they own or have nomination rights to, are let in accordance with a published allocation scheme. The allocation scheme must describe the procedure for letting homes and for determining the relative priority accorded to different categories of applicants.

The Council implemented a new Housing Allocation Policy in May 2013 following the introduction of the Localism Act 2011. The Act gives councils greater powers to decide which groups of people, within their area should qualify for housing. Although councils have greater scope to decide who qualifies for housing in their area, some priority must still be given to the groups of people defined in law as falling into a 'reasonable preference' category.

As part of the on-going review of all Council services using 'systems thinking' methodology, our Housing Department (comprising Neighbourhood Services and Housing Options) undertook a detailed review of their functions to fully understand the demand on our current housing waiting list and the existing allocations process. The systems-thinking review and extensive experiment into a new way of working gave us the unique opportunity to consider the design of our service, remove waste from our system and create a more bespoke, customer-centred approach to solving housing problems.

The purpose of the Council's housing service is to "understand each customer's housing problem and help them to solve it" and the proposed changes to the Housing Allocation Policy will enable the service to achieve its purpose. Other changes have been incorporated to reflect changes in legislation and statutory guidance since the last update in 2013.

If approved, this draft policy will be published for a six-week period of public

consultation. Following this period, and once any necessary amendments are incorporated, it is intended that the Housing Allocations Policy will be presented to the Executive for adoption (replacing the current Housing Allocations Policy).

An Equalities Impact Assessment (EIA) of the policy will be undertaken before it is recommended for adoption.

#### **Recommendation/Recommended Option:**

It is recommended that the draft Housing Allocation Policy, as provided in Appendix A to the report, be published for a six-week period of public consultation.

#### Reason:

To undertake a period of public consultation as part of the ongoing progression of the Housing Allocation Policy to adoption and implementation.

#### **Cost of proposals:**

The costs of publication and consultation are covered in the existing Housing Options operational budget

**Appendices:** A: Draft Housing Allocation Policy

**Background papers:** 

Reference papers:



### **Executive Briefing Paper**

Date:	02 September 2019
Subject:	Consultation: Draft Housing Allocations Policy
Briefing by:	Deputy Chief Executive Officer
Portfolio:	Housing

#### INTRODUCTION

- 1. The Housing Act (1996) requires all housing authorities to have a scheme for determining priorities and procedures in allocating social housing. The Council's existing Allocations Policy was last reviewed in 2013 following the introduction of the Localism Act (2011). The Act gives councils greater powers in deciding which groups of people within their area should qualify for social housing but retains a 'reasonable preference criteria' for certain groups as defined by law.
- 2. Since the publication of our existing Allocations Policy there has been changes in legislation and statutory guidance, and significant changes to the way allocations to social housing are dealt with following the 'systems-thinking' review of our Housing Department. The draft Housing Allocations Policy (at Appendix A) has therefore been updated accordingly and the most significant change is the removal of the choice-based letting scheme.
- 3. The Council introduced the Government's choice-based lettings scheme, known locally as LetSelect, a number of years ago. Available properties are advertised on our website and households registered on our housing waiting list can express an interest or 'bid' on those properties. The adverts run for one week following which, the allocation decision is made based on the banding and position of only those who have placed a 'bid' for the property and therefore could exclude a household more suited to the property.

#### **SERVICE REVIEW**

4. As part of the on-going review of all Council services using 'systems thinking' methodology, our Housing Department (comprising Neighbourhood Services and Housing Options) undertook a detailed assessment of their functions to fully understand the demand on our current housing waiting list and the existing allocations process. This is known in systems-thinking as 'check' and simply means getting knowledge about the 'what and why' of current performance and involves a number of steps:

- 1) Understand what the 'purpose' of our service is from the customer's point of view
- 2) Identify the type and frequency of the demand on our service
- 3) Study and map the flow of work to assess what is currently provided, how well we respond to the demands of our service and how well we are achieving our 'purpose'
- 5. Assessment of the working practices highlighted that housing is offered not only to those with a housing 'need' but also to those with a housing 'want'. This means that as well as giving priority to vulnerable and homeless or inadequately housed people, priority through the current housing allocation policy is also given to those who simply want to move to alternative accommodation without any real necessity to move. With the limited availability of housing, allocating in this way is not sustainable or equitable.
- 6. There is an average of 80 bids for every property advertised on LetSelect and the review found substantial evidence that allocating properties in this manner is administratively time consuming, resource intensive and does little in the way of meeting the housing need of our customers. Feedback from customers also concluded that there is not enough information on LetSelect for them to understand whether the property really meets their needs.
- 7. The review team started to experiment with a new way of allocating to Councilowned properties. On receipt of a notification of a property becoming void, we did not advertise it on LetSelect, but matched a suitable applicant from the housing waiting list. The process of matching included obtaining up to date and detailed information about their current circumstances and gaining knowledge of the attributes of the property becoming vacant. For example, does it contain adaptations that could be made use of by an applicant, what are the sizes of the rooms, local knowledge obtained from the Neighbourhood Officer, etc. By amalgamating all this knowledge, the most appropriate person in the highest need of re-housing was matched to the property.
- 8. We gradually and carefully increased the number of allocations made in this way until we reached a point where we stopped advertising Council-owned properties completely. The experiment has resulted in a better, more efficient process and a similar trial commenced with our main Housing Association partner, VIVID Housing which has achieved similar results.
- 9. The second element of the experiment focused on customers who approached the Housing Options Team for advice and assistance about housing. By providing a more comprehensive and responsive service, specifically tailored to individuals and at a time when it was most needed, we saw a dramatic reduction in repeat contact and queries thus enabling officers more time to resolve customers' problems. This improved process enabled customers to make fully informed decisions about their housing within a clear and transparent system, in the knowledge that the level of support they required would be available to them by their case officer.

- 10. Giving an informed choice is made possible by matching our knowledge of what the customer is seeking with details of the availability of stock in their desired location. An analysis of our housing waiting list has been undertaken which has allowed us to understand what demand there is across the Borough for the various property types. This information is then matched to our current stock availability.
- 11. Our review showed that many customers repeatedly enquire about progress of their application because of an unrealistic expectation of what they are likely to receive. As our stock turnover is now more predictable we can use this data to inform customers on the likely waiting time for the type of home they need.

#### THE PROPOSED POLICY CHANGES

## Ending the choice-based lettings scheme and introduce a best-match direct letting scheme

- 12. Choice-based letting schemes build in prescribed timescales and delays in the voids and allocations process. It prevents meaningful engagement with our customers and the opportunities to fully understand their requirements. Our review proved it is possible to give customers choice by recording their preferences at the time they join the housing waiting list and involve them in moving when a property becomes available. Consequently, we can bring the customer to view a property before the previous tenant leaves together with the contractors responsible for repair and refurbishment of the property. By doing this, the customer can influence the level of repair and unnecessary refurbishment is eliminated.
- 13. The existing policy does not allow for officers to fully understand the customer's needs because it simply requests that an application form is completed. The new policy removes the need for an application form and instead provides customers with an opportunity to discuss their housing problem in detail with a Housing Options Officer. This will ensure that customers can explore all available options and make an informed choice to best meet their housing needs.

#### Renaming the priority bands

14. Customers are categorised in priority bands, the existing policy bands are 'urgent, high, medium and low'. It was identified that some customers felt that being put in the 'low' band made them feel like they would not ever be housed and were considered to be an insignificant priority. This often led to waste work which in few cases changed the outcome. Therefore, the new policy has renamed the bands by simply lettering them A – D. the 'A' band replaces 'urgent' through to 'D' band replacing 'low'.

#### Appropriate updates to reflect changes in legislation

15. The draft Allocations Policy now includes the following legislation and statutory guidance:

- The Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015
- Statutory guidance on social housing allocations for local authorities in England: Improving Access to Social Housing for Victims of Domestic Abuse in Refuges or Other Types of Temporary Accommodation (November 2018)
- 16. It also includes the Government's proposals (not yet legislation) for assigning a priority to divorced or separated spouses of those serving in the Armed Forces.

#### Other miscellaneous changes

- 17. Some further minor changes are proposed to help customers make an informed housing choice:
  - The medical priorities have been amended to include sensory and mental health conditions and reworded so the unintentional inference that alternative housing would 'heal' them is removed.
  - Where previously an income threshold devised in line with Local Housing Allowance was used, the new policy has removed a threshold altogether. By fully understanding each customer's circumstances, officers can use incoming payments and outgoing expenses to guide customers in making an informed housing choice
  - To ensure sheltered accommodation is being allocated appropriately, clearer qualification criteria has been added.
  - Two criteria have been removed; 'a person or household living in any moveable structure with or without formal tenancy arrangements' and 'a tenant living in the borough with dependent children living above the ground floor'. The reason for these to be removed is that the former criteria has a very low demand and can be administered within other priorities. The latter is that unless other priorities are evident and due to the limited accommodation available, households are unlikely to be rehoused with a garden. In addition, many customers do not express a wish for a garden as a priority, instead understand through discussions with officers what housing options are available.

#### CONSULTATION

- 18. Government guidance advises that Housing Authorities 'must ensure a reasonable time for consultation to anyone who may be affected to changes in an Allocations Policy'. Our consultation will run for a minimum of six-weeks and it will be open to all for comments.
- 19. The document will be made available on-line and all appropriate methods of publicising the consultation will be used. We will ensure key partners (including all Registered Providers to whom we have a nominations agreement with) are aware of the consultation period. All existing households on the housing waiting

list will be notified of the consultation and invited to comment on the proposals.

#### **NEXT STEPS**

20. Following the consultation period, it is intended that any necessary changes will be incorporated into the document before the Allocations Policy is returned to the Executive with a recommendation to adopt it.

#### **Enquiries:**

For further information on this report please contact Caroline Newman (Ext 4645)