

**Appendix A – Table of comparison between draft allocations policy and Government consultation on reforms to social housing allocations.**

<u>Government Consultation proposals to social housing allocation</u>	<u>Fareham BC Draft Allocations policy</u>
<p><b>UK Connection Test</b> - where a person must demonstrate their connection to the UK before they can be allocated social housing. This can be achieved by (a) being a British citizen, Irish citizen, Commonwealth citizen with a right of abode, or EEA or Swiss citizen with equal treatment right or (b) by being a lawful resident in the UK for 10 years</p> <p>The government is proposing that those who arrive as part of a safe and legal resettlement or relocation scheme will be exempt from the UK connection test. This includes the UK Resettlement Scheme, Afghan Relocations and Assistance Policy Scheme, Afghan Citizens Resettlement Scheme, and the Ukraine temporary visa schemes (the Ukraine Sponsorship Scheme (Homes for Ukraine), Ukraine Family Scheme and Ukraine Extension Scheme).</p> <p>New applicants and those on a waiting list would need to satisfy the new test, or be part of an exempted group, before they are allocated social housing</p>	<p>This is broadly in line with the draft allocations policy, however the specification of a minimum age limit would be beneficial. There are concerns around the potential for British citizens who have chosen to live abroad for a number of years returning to the UK and potentially being eligible for social housing with no ‘habitual residency’ test applied.</p> <p>The requirement to live in the UK for 10 years isn’t compatible with the draft allocations policy, which is aligned to a 5 year period, which ties in with the existing and draft allocations policy around family connections to the area.</p> <p>FBC already requests evidence as proof of eligibility to join the housing register and implementation of a new UK connection test is estimated to take between 1 and 3 months. However, there are very low numbers of applicants who would likely be impacted – for example, from data taken in 2021 95.6% of people in Fareham consider themselves to be white British, with 4.4% being from another ethnic group.</p>
<p><b>Local connection test</b> – where a person must demonstrate a connection to a local area for at least 2 years before they can be allocated social housing. This will ensure greater consistency across the country and ensure more local people can access social housing in the area they call home, supporting people to put down roots and maintain links to family and community</p>	<p>The council already has a local connection test (current and new draft policy). The test used at FBC is more comprehensive than that proposed by the Government. If the Government proposal is implemented in isolation, it would potentially allow many more people onto Fareham’s local housing register. If implemented through Government reform this will potentially increase the number of people who qualify</p>

<p>The government intends to use a broader definition for local connection than residence, in order to capture employment and family associations as well.</p>	<p>to join, and place additional burden onto the demand for affordable housing in the Borough.</p>
<p><b><u>Income test</u></b> – setting thresholds for applicants and those on a waiting list to qualify for social housing. This will have no impact on existing tenants, but rather will ensure new tenancies are reserved for those who, at the point of signing for a new social home, would most struggle to afford private accommodation</p> <p>As part of this consultation, the Government are seeking views on where the income threshold should be set and whether this should vary at a regional level.</p>	<p>FBC does not include an income threshold with the new draft policy. Income alone does not give a full understanding of a customer’s ability to afford social housing. Applicants are assessed on affordability, so their outgoings and ongoing financial commitments are taken into account. Anyone with savings over £16,000 is excluded as this is the threshold at which benefits are generally withdrawn.</p> <p>Setting a national threshold doesn’t take into account regional variance in earnings and cost of living. Should a new income test be introduced a period of implementation would need to take place as it would impact applicants already on the list who would need to be reassessed.</p>
<p><b><u>Anti-social behaviour test</u></b> – people who have unspent convictions for certain criminal anti-social behaviour, as well as certain civil sanctions, will be disqualified from social housing for a defined period.</p> <p>This would require local housing authorities to check whether there is evidence of an applicant having been subject to specified anti-social behaviour sanctions.</p>	<p>This disqualification criteria doesn’t feature in the draft policy.</p> <p>Applicants may be excluded from joining the housing register if it is established that they, or a member of their household are assessed as being unsuitable to sustain a tenancy due to serious anti-social behaviour , nuisance or annoyance to neighbours or Illegal or immoral use of the property.</p> <p>The government proposal is therefore more robust.</p>
<p><b><u>Terrorism test</u></b> – terrorist offenders with unspent convictions will not qualify for social housing unless excluding them would increase the risk to public safety</p>	<p>The new draft policy makes no provision around terrorism.</p> <p>Clarification around how FBC can source this data.</p>

<p><b><u>Grounds for eviction (anti-social behaviour and terrorist offences)</u></b> – implementing a ‘three strikes and you’re out’ policy for repeat offenders of anti-social behaviour, and creating a new ground for eviction for terrorist . It would mean 3 proven instances of anti-social behaviour followed by three warnings from your landlord. After three proven instances of anti-social behaviour (and three warnings from the landlord), the government thinks it is right that perpetrators face eviction.</p>	<p>As outlined above under the Anti-social behaviour test, this is a new proposal which doesn’t feature in the Allocations Policy. If implemented, it may result in some applicants being ineligible to join the housing register, although a homelessness duty may still be owed.</p>
<p><b><u>Fraudulent declaration test</u></b> - mandating a period of disqualification for those who knowingly or recklessly make false statements when applying for social housing</p>	<p>This is broadly in line with the draft policy, whereby applicants found to have mad false declarations may be excluded from the housing register.</p>
<p><b><u>Applicants on a waiting list</u></b> – applying the new eligibility and qualification tests not only to new applicants but also to those currently on a social housing waiting list.</p> <p>Guidance will be issued to local housing authorities setting out the evidence considered suitable to meet each test, noting the need to minimise costs and administrative burden. In relation to the anti-social behaviour and terrorism tests, we will recommend that local housing authorities should rely on an applicant’s self-declaration at the application stage. Any formal criminal records check should only be undertaken at the point of allocating a social home.</p>	<p>The draft provision means that an annual review of all housing applicants on the housing register will be undertaken, which would then be used to ensure any new eligibility and qualification tests set out by the government can be taken into consideration for all existing applicants.</p>