

Classification: Public

Key Decision: Yes

Gravesham Borough Council

Report to: Housing Services Cabinet Committee

Date: 12 February 2020

Reporting officer: Wale Adetoro Assistant Director (Housing Policy and Management)

Subject: Allocations Policy Review

Purpose and summary of report:

To seek approval for the review of the council's Housing Allocations Policy and the commencement of wider consultation on the proposed changes to the policy.

The proposed changes to the housing allocation policy are to ensure that the council's policy reflects changes in legislation, guidance and good practice and the redraft provides a comprehensive housing allocation scheme which reflects how the authority will assess and prioritise the high demand from applicants for the limited supply of social housing, to make best use of the stock available and deal with urgent housing needs e.g. homelessness.

A Chartered Institute of Housing (CIH) research has identified barriers to accessing social housing and advocates a person rather process based approach, which has been taken into account in looking at the proposed revisions to the current allocations policy. There are three distinct stages in a system for allocating social homes and related processes and criteria vary across the country and across organisations. In putting together the proposed changes, considerations have been given to processes in the current policy that fail to account for individuals' unique circumstances and housing histories which can create unnecessary barriers for households most in need of social homes.

Recommendations:

- Approval of the proposed changes as detailed in appendix 2
- Approval for commencement of wider / public consultation on the changes to the policy.

Background

- 1.1 Each local housing authority in England and Wales is required by the Housing Act 1996, Part 6 to have a scheme for the allocation of social housing. Even if there is no statutory requirement, each local authority would, in practice, need to adopt arrangements for the selection of applicants for the grant of available secure or introductory tenancies in its own stock and for the nomination of applicants to registered providers, which would be mainly housing associations.

- 1.2 The existing policy was introduced in 2014 to reflect the new legislation at that time relating to welfare reforms and the Localism Act 2011.
- 1.3 The policy is deemed to be in need of a review to ensure that we continue to help those in greatest need of housing as well as making best use of the available housing stock within the Borough.
- 1.4 Appendix 2 provides details of the significant changes proposed, however, should a full version of the draft allocations policy be required, this can be provided by the Committee Section.
- 1.5 Subject to Management Team approval, the significant changes will be presented to the Housing Cabinet Committee on 25 March 2020 for approval.
- 1.6 An important requirement of the introduction of an allocations policy is consultation with stakeholders which will include relevant council officers, housing association providers, housing support agencies, and the public. Subject to approval by committee on 25 March 2020, the views of stakeholders will be sought in a consultation process lasting 12 weeks commencing in April 2020.
- 1.7 By the end of July 2020, a 28 day Notice of Key Decision will be published advising of the change to the current policy.
- 1.8 On 6 July 2020, and subject to the completion of a Data Protection Impact and Equality Impact Assessments being undertaken, the revised policy will be presented to the Housing Cabinet Committee for final approval and recommendation to Cabinet for adoption.
- 1.9 Subject to final approval, the revised policy will be presented to Cabinet on 7 September 2020.
- 1.10 Following the policy being adopted, a programme of officer training will be implemented, with the new policy in place at the beginning of the October 2020.

Implications

The implications are summarised in Appendix 1

| IMPLICATIONS | APPENDIX 1 |
|--|---|
| Legal | <p>S.167 (1) Housing Act 1996 states “Every local housing authority shall have a scheme (their “allocation scheme”) for determining priorities and as to the procedure to be followed, in allocating housing accommodation.</p> <p>For this purpose, “procedure” includes all aspects of the allocation process, including the persons or descriptions of persons by whom decisions are to be taken.</p> |
| Finance and Value for Money | <p>There will be a cost for the updating of the Locata system as well as possible overtime and weekend working costs for staff that will be required to update the system. It is anticipated that this can be covered from salary savings during the year.</p> <p>Work done to ensure the development of the allocations policy will enable us to avoid costly legal challenges or compensation awards by the Ombudsman which could significantly exceed that of the proposed expenditure.</p> |
| Risk Assessment | <p>It is a statutory requirement for a local authority to have an allocations policy, and for that scheme to be lawful, it must comply with all associated legislation and codes of guidance.</p> <p>Failure to have a lawful scheme will lead to legal challenges that the authority would not be in a position to defend.</p> <p>In addition to any legal challenges that might be presented, challenges may also come from the Housing Ombudsman, and the Local Government Ombudsman are empowered to award damages to those applicants where it is satisfied that maladministration has taken place.</p> |
| Data Protection Impact Assessment | <p><i>A data protection impact assessment (DPIA) should be carried out at the start of any major project involving the use of personal data or if you are making a significant change to an existing process.</i></p> <p>a. Does the project/change being recommended through this paper involve the processing of personal data or special category data or criminal offence data? A definition of each type of data can be found on the Information Commissioner’s Office website via the above links.</p> <p>b. If yes to question a, have you completed and attached a DPIA including Data Protection Officer advice? N/A</p> <p>c. If no to question b, please seek advice from your nominated DPIA assessor or the Information Governance Team at gdpr@medway.gov.uk. N/A</p> |
| Equality Impact Assessment | <p>a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community? If yes, please explain answer. No The individuals that will experience an adverse impact due to the decisions</p> |

| | |
|--|--|
| | <p>through this paper are not in identifiable groups for purposes of an equality impact assessments.</p> <p>b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality? If yes, please explain answer.</p> <p>N/A The draft allocation scheme will be subject to consultation and an equality impact assessment.</p> <p><i>In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above</i></p> |
| Corporate Plan | In line with the objectives of the Corporate Plan 2019-24 corporate objective 1 - People, the Housing Allocations Policy will help ensure the commitment to provide a proactive, supportive and financially efficient housing service: high quality tenant management experienced through a service making full use of its assets. |
| Crime and Disorder | The Policy will contribute to addressing crime and disorder by providing a scheme which recognises need in the allocation of its housing stock |
| Digital and website implications | The revised policy will be published on the council's website |
| Safeguarding children and vulnerable adults | Provision of homes allocated via the Allocations will ensure the safeguarding of children and vulnerable adults. |

Housing Allocations Policy – Proposed changes

It is proposed to make a number of changes to the Council's Housing Allocations Policy. Some of these will be minor changes, or are required to reflect changes in legislation and guidance. However, there are potentially a number of significant procedural changes which have been subject to an internal consultation, the results of which have been taken into account in the proposed changes set out in this report. Changes are proposed for the following:

- Definition of qualifying local connection criteria
- Sanctions for refusing an offer of social housing
- Simplification of the priority banding awarded on medical grounds
- Simplification of the priority banding awarded on overcrowding grounds
- Definition of band D priority
- Enhancement of the priority banding awarded to homeless households
- Simplification of the priority banding awarded to under occupying tenants

Background information - Housing register comparative data

Applications

A snapshot figure of the number of live applications on the housing register in April 2019 shows 1,610 households registered in bands A to D with 655 (41%) assessed as needing a 1 bedroom property and 575 (36%) needing a 2 bedroom property. Demand for larger properties with 3 or more bedrooms is much lower.

67 applications (4%) were assessed as band A priority, with over half of these needing a 2 bedroom property. 1,033 (64%) applications were assessed as band B or band C priority. Approximately one third of applications were assessed as having no housing need and placed in band D.

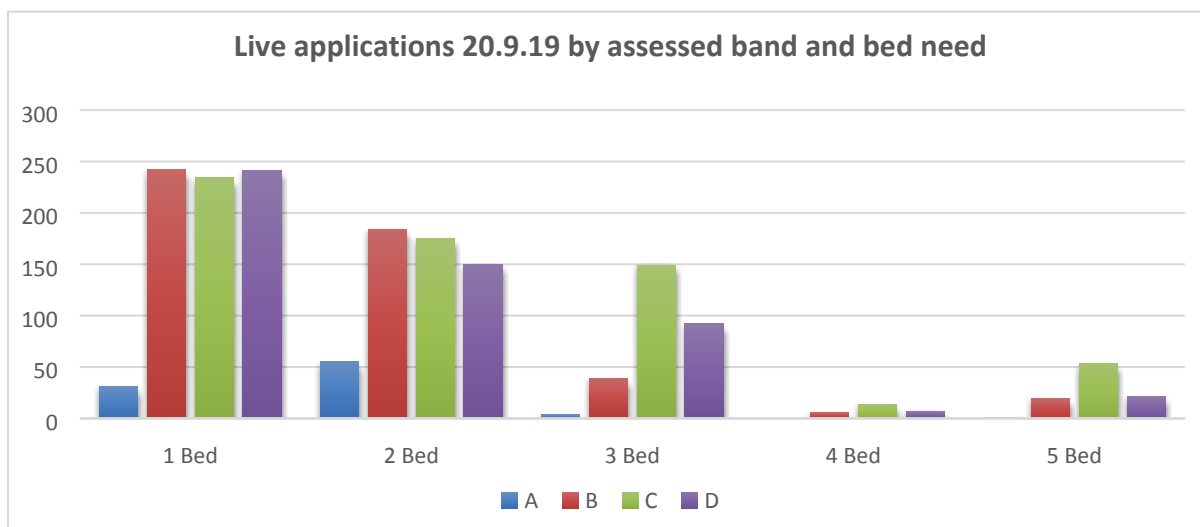
Table 1. Live applications 12.4.19 by assessed band and bed need.

| Band | 1 bed | 2 bed | 3 bed | 4 bed | 5 bed | Blank | Total |
|-------|--------------|--------------|--------------|------------|------------|------------|-----------|
| A | 26 | 36 | 3 | | 1 | 1 | 67 (4%) |
| B | 187 | 176 | 26 | 5 | 17 | 3 | 414 (26%) |
| C | 215 | 197 | 135 | 16 | 55 | 1 | 619 (38%) |
| D | 227 | 166 | 86 | 6 | 19 | | 504 (31%) |
| P | 2 | 3 | 1 | | | | 6 (<1%) |
| Total | 657 (41%) | 578 (36%) | 251 (16%) | 27 (2%) | 92 (6%) | 5 (<1%) | 1,610 |

A follow up snapshot of live applications on the housing register in September 2019 showed an increase to 1,717 households in bands A to D with similar trends in respect of property size requirements and priority band assessments.

Table 2. Live applications 20.9.19 by assessed band and bed need

| Band | 1 bed | 2 bed | 3 bed | 4 bed | 5 bed | Blank | Total |
|-------|--------------|--------------|--------------|------------|------------|------------|-----------|
| A | 31 | 55 | 4 | 0 | 1 | | 91 (5%) |
| B | 242 | 184 | 39 | 6 | 19 | | 490 (28%) |
| C | 234 | 175 | 149 | 14 | 53 | | 625 (36%) |
| D | 241 | 150 | 92 | 7 | 21 | | 511 (30%) |
| P | 3 | 0 | 4 | 0 | 0 | 3 | 10 (<1%) |
| Total | 751 (43%) | 564 (33%) | 288 (17%) | 27 (2%) | 94 (5%) | 3 (<1%) | 1,727 |



Applications are divided into those tenants already in social housing seeking a move to alternative accommodation (transfer) and those in the private sector seeking social housing (homeseeker).

Table 3. Live applications 20.9.19 according to applicant status

| Band | Transfer | Homeseeker |
|-------|-----------|-------------|
| A | 36 | 55 |
| B | 122 | 368 |
| C | 165 | 460 |
| D | 123 | 388 |
| Total | 446 (26%) | 1,271 (74%) |

Lettings

The number of properties that become available and are advertised for applicants to place bids on remains relatively low compared to the demand. Details of all lets during 2018/19 are detailed in Table 4 below. Applicants seeking a property with 1 or 2 bedrooms make up over three quarters of the applicants registered for housing – a total of 1,235 applicants in April 2019 – with just 190 properties let to this group in 2018/19.

Over 80% of all properties were let to applicants in bands A and B. Although applicants in band C only accounted for 9% of all lets, 20% of 3 bedroom homes were let to band C applicants, whilst those in band D were primarily successful in securing sheltered accommodation, accounting for 42% of these lets.

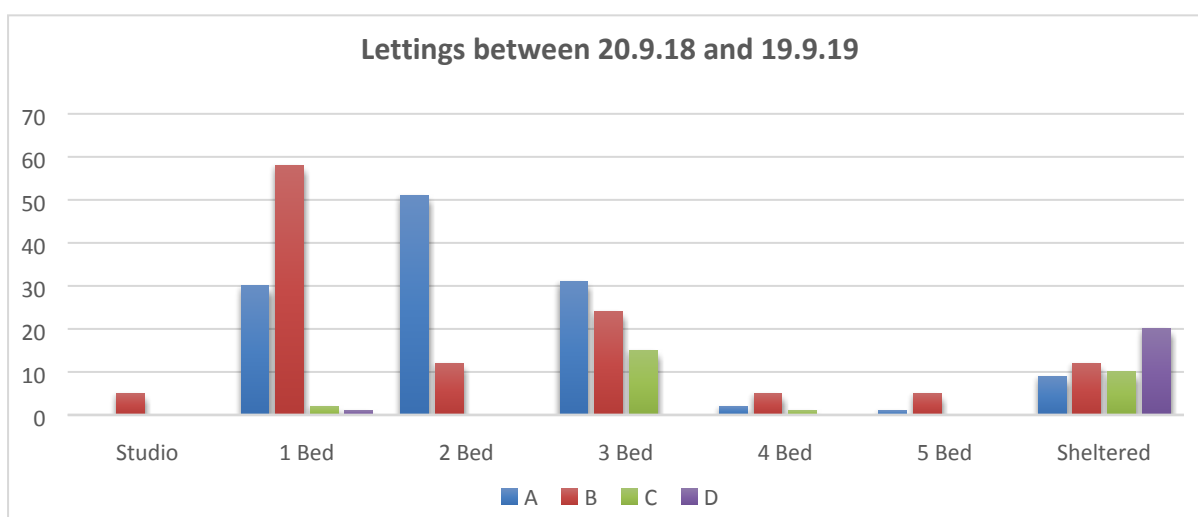
Table 4. Lettings between 1.4.18 to 31.3.19

| Band | Studio | 1 bed | 2 bed | 3 bed | 4 bed | 5 bed | Sheltered | Total |
|--------------|---------------|------------------|-----------------|-----------------|---------------|---------------|-----------------|------------------|
| A | 0 | 16 | 63 | 42 | 2 | 0 | 7 | 130 (38%) |
| B | 6 | 85 | 15 | 24 | 3 | 5 | 15 | 153 (45%) |
| C | 1 | 1 | 0 | 16 | 1 | 0 | 10 | 29 (9%) |
| D | 0 | 2 | 1 | 0 | 0 | 0 | 23 | 26 (8%) |
| Total | 7 (2%) | 104 (31%) | 79 (23%) | 82 (24%) | 6 (2%) | 5 (1%) | 55 (16%) | 338 |

A follow up report of lettings between September 2018 and September 2019 showed a drop in the overall number of properties let during this 12 month period compared to the 2018/19 year, but showed similar trends in respect of the priority banding of successful bidders and the range of property sizes available.

Table 5. Lettings between 20.9.18 and 19.9.19

| Band | Studio | 1 bed | 2 bed | 3 bed | 4 bed | 5 bed | Sheltered | Total |
|--------------|---------------|-----------------|-----------------|-----------------|---------------|---------------|-----------------|--------------------|
| A | 0 | 30 | 51 | 31 | 2 | 1 | 9 | 124 (42.2%) |
| B | 5 | 58 | 12 | 24 | 5 | 5 | 12 | 121 (41.2%) |
| C | 0 | 2 | 0 | 15 | 1 | 0 | 10 | 28 (9.5%) |
| D | 0 | 1 | 0 | 0 | 0 | 0 | 20 | 21 (7.1%) |
| Total | 5 (2%) | 91 (31%) | 63 (21%) | 70 (24%) | 8 (3%) | 6 (2%) | 51 (17%) | 294 |



Waiting Times

It is impossible to predict how long a particular applicant will be waiting before being made an offer of social housing from the housing register, as this depends on the number of suitable properties becoming available and the number of applicants that are registered for housing who choose to place a bid on properties that are advertised. However, an analysis of properties that have been let over the preceding 12 months can provide an indication. Table 6 shows the waiting times for all property types for all successful bidders between September 2018 and September 2019, indicating that the average waiting time before being rehoused is currently between 10 and 24 months.

Table 6. All lettings between 20.9.18 and 19.9.19

| Property | No of lets | Longest Wait | Shortest wait | Average wait |
|-----------------------|------------|--------------|---------------|--------------|
| Sheltered | 51 | 11 years | 5 weeks | 13 months |
| Studio | 5 | 15 months | 8 months | 11 months |
| 1 bed | 91 | 14 years | 7 weeks | 22 months |
| 2 bed house | 24 | 12 years | 7 months | 24 months |
| 2 bed flat/maisonette | 39 | 3 years | 4 weeks | 12 months |
| 3 bed house | 56 | 6 years | 3 days | 11 months |
| 3 bed flat/maisonette | 14 | 4 years | 8 months | 26 months |
| 4 bed | 8 | 5 years | 5 months | 22 months |
| 5 bed | 6 | 15 months | 10 weeks | 10 months |

When the waiting time is broken down to applicants in each of the priority bands, there are significant differences. Tables 7 to 10 show the waiting times for applicants in Bands A to D respectively.

Table 7. Lettings to applicants in band A between 20.9.18 and 19.9.19

| Property | No of lets | Longest Wait | Shortest wait | Average wait |
|-----------------------|------------|--------------|---------------|--------------|
| Sheltered | 9 | 10 years | 7 weeks | 23 months |
| Studio | 0 | | | |
| 1 bed | 30 | 14 years | 7 weeks | 3 years |
| 2 bed house | 21 | 12 years | 7 months | 23 months |
| 2 bed flat/maisonette | 30 | 18 months | 4 weeks | 6 months |
| 3 bed house | 31 | 9 months | 3 days | 11 weeks |
| 3 bed flat/maisonette | 0 | | | |
| 4 bed | 2 | 6 months | 5 months | 5 months |
| 5 bed | 1 | 10 weeks | 10 weeks | 10 weeks |

Table 8. Lettings to applicants in band B between 20.9.18 and 19.9.19

| Property | No of lets | Longest Wait | Shortest wait | Average wait |
|-----------------------|------------|--------------|---------------|--------------|
| Sheltered | 12 | 17 months | 5 weeks | 5 months |
| Studio | 5 | 15 months | 8 months | 11 months |
| 1 bed | 58 | 4 years | 4 months | 15 months |
| 2 bed house | 3 | 4 years | 19 months | 30 months |
| 2 bed flat/maisonette | 9 | 3 years | 22 months | 30 months |
| 3 bed house | 22 | 6 years | 10 weeks | 17 months |
| 3 bed flat/maisonette | 2 | 10 months | 8 months | 9 months |
| 4 bed | 5 | 5 years | 14 months | 29 months |
| 5 bed | 5 | 15 months | 9 months | 12 months |

Table 9. Lettings to applicants in band C between 20.9.18 and 19.9.19

| Property | No of lets | Longest Wait | Shortest wait | Average wait |
|-----------|------------|--------------|---------------|--------------|
| Sheltered | 10 | 11 years | 11 weeks | 25 months |
| Studio | 0 | | | |

| | | | | |
|-----------------------|----|-----------|-----------|-----------|
| 1 bed | 2 | 13 months | 11 months | 12 months |
| 2 bed house | 0 | | | |
| 2 bed flat/maisonette | 0 | | | |
| 3 bed house | 3 | 5 years | 4 years | 4 years |
| 3 bed flat/maisonette | 12 | 4 years | 13 months | 29 months |
| 4 bed | 1 | 18 months | 18 months | 18 months |
| 5 bed | 0 | | | |

Whilst lettings to band A to C occur across the whole range of properties, applicants in band D are almost exclusively offered sheltered housing properties with only one general needs property let to this cohort, during the 12 month period between September 2018 to September 2019.

Table 10. Lettings to applicants in band D between 20.9.18 and 19.9.19

| Property | No of lets | Longest Wait | Shortest wait | Average wait |
|-----------------------|------------|--------------|---------------|--------------|
| Sheltered | 20 | 24 months | 7 weeks | 9 months |
| Studio | 0 | | | |
| 1 bed | 1 | 7 months | 7 months | 7 months |
| 2 bed house | 0 | | | |
| 2 bed flat/maisonette | 0 | | | |
| 3 bed house | 0 | | | |
| 3 bed flat/maisonette | 0 | | | |
| 4 bed | 0 | | | |
| 5 bed | 0 | | | |

Proposed changes to housing allocations policy

- **Proposed change to the definition of local connection.**

Currently, all applicants wishing to join the housing register are required to evidence their qualifying local connection in one of 3 ways:

Either – permanent residence within the borough without a break for the preceding two years; or continuous employment within the borough for at least two years, or needing to live in the borough to give care to or receive care from a close relative who has lived in the borough for at least 5 years.

It is proposed to simplify this to include just the first two categories and exclude those who need to move here to give or receive care as a specific category as the current definition is very restrictive. Some applicants will still be able to register without a local connection on residence or employment grounds in exceptional circumstances such as members of the armed forces and former service personnel or their bereaved spouses/civil partners, those at risk of domestic abuse, and those owed the main housing duty as a result of homelessness. Applicants needing to move into the borough to give or receive care will be included within the exceptional circumstances category, so that each case can be considered on its particular merits. *(Table 11 shows that 12% of applications are removed due to not meeting these local connection criteria although it is not possible to break this down into categories)*

Not all applications to the housing register are successful. Some applicants do not meet the qualifying criteria which include having a local connection to the borough, or fail to provide the necessary documentary evidence that is required to verify their circumstances. In addition, applicants that do not place any bids for more than six months may be removed provided that there have been one or more suitable properties available for them to bid on. In 2018/19 2,096 applications were removed with a further 648 removed in the first two quarters of 2019/20. Table 11 shows the main reasons for removing applications from the housing register with non-bidding accounting for almost half of these cases and failing to provide evidence accounting for a further quarter.

Table 11. Reasons for removal from Housing Register 2018/19 and first half of 2019/20

| Reason | Apr-Jun 2018 | Jul-Sep 2018 | Oct-Dec 2018 | Jan-Mar 2019 | Apr-Jun 2019 | July-Sep 2019 | Total |
|--------------------------|--------------|--------------|--------------|--------------|--------------|---------------|--------------------|
| Non bidder (Band A) | 9 | 2 | 6 | 8 | 8 | 9 | 42 |
| Non bidder (Band B) | 12 | 45 | 96 | 22 | 34 | 41 | 250 |
| Non bidder (Band C) | 15 | 19 | 409 | 26 | 18 | 44 | 531 |
| Non bidder (Band D) | 22 | 19 | 373 | 57 | 31 | 32 | 534 |
| All non bidders | 58 | 85 | 884 | 113 | 91 | 126 | 1,357 (49%) |
| No Local connection | 45 | 48 | 41 | 74 | 79 | 36 | 323 (12%) |
| Applicants request | 4 | 10 | 1 | 1 | 1 | 7 | 24 (1%) |
| Change of circumstances | 7 | 0 | 9 | 17 | 16 | 32 | 81 (3%) |
| Housed by Direct Let | 4 | 7 | 10 | 11 | 6 | 5 | 43 (2%) |
| Documents not supplied | 36 | 242 | 82 | 190 | 25 | 147 | 722 (26%) |
| Duplicate application | 8 | 14 | 3 | 1 | 7 | 9 | 42 (2%) |
| Outstanding rent arrears | 3 | 19 | 8 | 22 | 14 | 24 | 90 (3%) |
| Other reasons | 6 | 12 | 4 | 17 | 16 | 7 | 62 (2%) |
| Total | 171 | 437 | 1,042 | 446 | 255 | 393 | 2,744 |

Policy changes following result of consultation:

Local connection criteria of continuous period of residence/employment at the time of application to be retained as supported by 100% (in the case of residence) and 80% (in the case of employment) of respondents. Period of residence/employment to be extended to 3 years.

A specific local connection criterion of giving or receiving care from a relative to be removed as this is supported by 66% of respondents. Ability for specific cases to be considered under exceptional circumstances/discretionary grounds to be retained.

Table 12. Length or residence required in order to qualify to join the housing register in Kent/SE London local authorities:

| Local authority | Qualifying residence criteria |
|-----------------------|---|
| Ashford | 12 months |
| LB Bexley | 5 years |
| LB Bromley | 5 years |
| Canterbury | 3 out of the last 5 years |
| Dartford | 2 years |
| Dover | 6 out of the last 12 months or 3 out of the last 5 years |
| Folkestone and Hythe | 2 years or 3 out of the last 5 years |
| Maidstone | 2 years |
| Medway | 2 years |
| Sevenoaks | 6 out of the last 12 months or 3 out of the last 5 years |
| Swale | 4 out of the last 5 years |
| Thanet | 3 years |
| Tonbridge and Malling | 6 months , 6 out of the last 12 months or 3 out of the last 5 years |
| Tunbridge Wells | 3 years or 5 out of the last 10 years |

- **Proposed change to refusal sanctions**

Most applicants that are successful in bidding for a property will accept it. Currently, most applicants are entitled to receive two offers and can refuse one property without sanction, with a second refusal resulting in a six month suspension from the housing register. An average of 18 applicants refuse a property offer each quarter, with one further applicant being suspended following two refusals. (Table 13) However, those who are offered a property to resolve their homelessness or on a discretionary/direct let basis are expected to accept the first property that is offered to them. Applicants seeking sheltered housing are not usually penalised for refusing an offer, and could theoretically refuse multiple properties indefinitely.

Table 13 below shows the number of applicants that have refused one or more offers of accommodation.

Table13. Refusals 2018/19 and first half of 2019/20

| | Apr-Jun 2018 | Jul-Sep 2018 | Oct-Dec 2018 | Jan-Mar 2019 | Apr-Jun 2019 | July-Sep 2019 | Total |
|-----------------------------|--------------|--------------|--------------|--------------|--------------|---------------|------------|
| Applicants refusing | 24 | 16 | 22 | 12 | 26 | 5 | 105 |
| Applicants suspended | 1 | 1 | 1 | 0 | 1 | 0 | 4 |

Policy changes following result of consultation:

Two offer policy to be removed, with all applicants entitled to receive just one offer of suitable accommodation regardless of status (i.e. general needs, sheltered, homeless cases) as supported by 88% of respondents.

Although there was strong support for the removal from the housing register for applicants

refusing a property (61% of respondents), a number of respondents felt this was too severe. The current penalty of 6 months suspension will be increased to 12 months as a compromise between making no change to current policy and outright removal from the housing register.

- **Proposed change to the definition of medical priority**

Within the current policy there are 4 categories of medical priority that can be awarded which equate to:

Band A – high medical priority – where the current housing is seriously affecting a member of the household with a life threatening condition, or has a major adverse effect on a medical condition which warrants emergency priority

Band B – medium medical priority – where the current housing has a major adverse effect on a medical condition

Band C – low medical priority – where the current housing has an adverse effect on a medical condition creating a particular need for a move

Band D – no medical priority

The current definitions are confusing for customers and result in a number of requests for a review of the banding applied to individual applicants who believe that they meet higher criteria. It is proposed to amend the way that medical priority is awarded to just two categories: Band A where there is an evidenced urgent need to move on medical/mobility/disability grounds and Band C where there is an evidenced medical/mobility/disability need for a move. The assessment process will remain the same, based on the impact of the current housing on the medical condition, but it is intended to provide greater clarity for customers, their advocates and health professionals supporting a move..

Please note that it is not possible to state how many applicants are currently prioritised on medical grounds within each band.

Policy changes following result of consultation:

Change to two distinct categories of medical priority as this was strongly supported (76% of respondents), with very little support for a single category of medical priority.

Definitions for band A and band C priority on medical grounds to be clarified and all existing cases where band B priority has been awarded will be reassessed in line with the new definitions once the policy is adopted.

- **Proposed change to the definition of overcrowding**

Within the current policy there are 3 categories of overcrowding that can be awarded which equate to:

Band A – high priority – lacking two or more bedrooms in shared accommodation

Band B – medium priority – lacking two or more bedrooms in self-contained accommodation or lacking one bedroom in shared accommodation

Band C – low priority – lacking one bedroom in self-contained accommodation

In practice, most families that are overcrowded but not in self-contained accommodation are generally sharing facilities with family members or friends so the additional priority awarded may not be justified. It is proposed to simplify the priority awarded on the grounds of overcrowding to:

Band B where the household has two or more bedrooms fewer than they need; and

Band C where the household is lacking one bedroom

Please note that it is not possible to state how many applicants are currently prioritised on overcrowding grounds within each band.

Policy changes following result of consultation:

Only 36% of responders wanted to retain the current banding priorities. Change to two distinct categories of overcrowding based on the number of bedrooms lacking regardless as to whether applicants are living in self-contained or shared accommodation. Band C applies if the household is lacking one bedroom and band B applies where the current accommodation has two or more bedrooms fewer than needed.

• **Proposed change to the definition of band D priority.**

Currently, around one third of applicants joining the housing register are assessed as having no housing need and placed into band D (*Tables 1 and 2*). Band D applicants have no realistic prospect of being offered general needs social housing, with only one property let to this cohort between September 2018 and September 2019 (*Table 5*). In addition, 39% of the applicants removed from the housing register due to non-bidding were in band D (*Table 11*)

The assessment and inclusion of applicants without a verified housing need is not only administratively burdensome it also raises unrealistic expectations and encourages applicants to apply just in case they become in need of housing in the future. Should an applicant assessed as band D priority subsequently meet the criteria of housing need and be awarded band A, B or C, then their priority date would be adjusted to the date that the higher priority is awarded so there is no benefit to being included on the housing register where no housing needs have been identified.

It is therefore proposed to restrict the number of applicants in band D. Whilst the non-inclusion of all applicants without a housing need is an option, this would remove many applicants who could potentially be offered sheltered housing. Between September 2018 and September 2019, 39% of sheltered housing properties were let to applicants in band D (*Table 10*)

Although applicants in band D account for around one third of all applicants, with approximately half assessed as needing a 1 bedroom property, they only receive around 7% of all lettings, almost exclusively within the sheltered housing stock. An analysis of the age of applicants in band D shows that almost one third of applicants are aged over 55 with over 90% of these seeking a one bedroom home.

Table 14. Band D applicants aged over 55 as at 20.9.19

| Applicant | 1 bed need | 2+bed need | Total |
|------------|------------|------------|-------|
| Transfer | 52 | 6 | 58 |
| Homeseeker | 100 | 9 | 109 |
| Total | 152 | 15 | 167 |

Based on the snapshot of housing register applicants in September 2019 (*Table 2*), potential options include:

- Remove all applications currently in band D – 511 households
- Introduce a new housing need priority for ‘needing sheltered housing’ which would mean that an assessment as to whether an applicant is suitable for sheltered housing and therefore qualifies to join the housing register will need to be undertaken for all relevant applicants at the point of application. This could be assessed as band D priority.
- Allow all current social housing tenants without a housing need to remain in band D (removing 388 homeseekers – *Table 3*)
- Allow all applicants over the age of 55 without a housing need to remain in band D (removing 344 applicants under the age of 55 – *Table 14*)

Policy changes following result of consultation:

82% of responders wanted to change the current banding priorities and 63% agree with the removal of applicants with no housing need.
89% of responders supported the need for sheltered housing to be recognised as a housing need.

The definition of band D priority to be changed to include only those applicants assessed as needing sheltered housing.

- **Proposed change to the priority awarded to homeless households**

Under the current policy, homeless households where the Council has accepted the duty to rehouse are placed into band C alongside other households assessed as band C. *Table 9* shows that only 6% of general needs properties were let to applicants in band C between September 2018 and September 2019. Of the 18 properties let, 15 had three bedrooms, 2 had one bedroom and 1 had 4 bedrooms. It is not possible to distinguish between lets to homeless households and lets to other band C applicants.

The majority of accepted homeless households are living in temporary accommodation awaiting a move into a settled home either in the private sector or social housing via the housing register. As at 30 September 2019, there were 80 households living in temporary accommodation, of which 36 require a two bedroom home. Given the limited amount of social housing let to applicants in band C, particularly those with two bedrooms, (*Table 9* shows that there were no two bedroom properties let to applicants in band C between 20.9.18 and 19.9.19), and the practical difficulties in securing an affordable home in the private sector, it is proposed to increase the priority awarded to accepted homeless households to reduce the length of time they will be living in temporary accommodation and better manage the limited pool of temporary accommodation properties.

Policy changes following result of consultation:

60% of responders agree that the current priority banding for homeless households should be changed. The option to remain in band C for a period then move to band B was only supported by 33% of responders with the alternative of remaining in band C for a period then being offered a direct let supported by 27% of responders.

The option to place all homeless cases into band B from the date the duty was accepted was supported by 57% of responders and this option is proposed. All homeless applicants will be entitled to a relief duty for 56 days which will be used to focus on securing alternative accommodation, and a rehousing duty will only be accepted once the relief duty has expired.

- **Other Policy changes following result of consultation:**

A number of additional comments were received, which relate to assessment and verification issues, rather than banding priorities. However, comments relating to how under-occupation is currently assessed are relevant.

All tenants wishing to downsize should be given sufficient priority on the housing register to achieve a move, regardless of the number of bedrooms they are giving up. In particular, two bedroom properties are in great demand and the current policy only provides a band B priority for tenants wishing to move to a one bedroom property from a two bedroom property whereas those downsizing from larger properties are awarded band A priority (where they are giving up 2 or more bedrooms).

It is therefore proposed to have a single category of under-occupation priority - band A - for current tenants wishing to downsize, regardless of the size of property they currently occupy.

Project Plan – Gravesham Borough Council’s Housing Allocation Policy

Part One: Project definition and scope

| | |
|------------------------------|---|
| Name of the project | Gravesham Borough Council – Housing Allocation Policy Review |
| Statement of purpose | To review the existing housing allocation policy in light of changes in legislation, guidance and good practice and redraft a comprehensive housing allocation scheme which reflects how the authority will assess and prioritise the high demand from applicants for the limited supply of social housing to make best use of the stock available and deal with urgent housing needs e.g. homelessness. |
| Background | Gravesham Borough Council’s current housing allocation policy was implemented in June 2014. Since then there has been additional legislation (including the Homeless Reduction Act) and subsequent guidance issued by the ministry for Housing, Communities and Local Government which states that local housing authorities may need to review their allocations schemes in order to ensure that they deliver the requirements of the legislation and are sufficiently geared towards preventing homelessness. |
| Key Outcomes | That Gravesham Borough Council has a current detailed housing allocation scheme which sets out how applications for social housing will be assessed and prioritised. The draft housing allocation scheme will be shared with key partners who will be given an opportunity to comment on the proposals. A full data protection impact assessment that ensures the housing allocation scheme is compliant with relevant equalities and data protection legislation. |
| Key Outputs | The Council has an updated Housing Allocation Scheme |
| Project Team | Assistant Director of Housing (Policy & Management) Housing Needs and Improvements Manager Housing Options Team Manager Allocations Team Leader |
| Progress Reporting to | Director of Housing and Operations Management Team Cabinet Member for Housing |

Part Two: Delivery

| Milestone | Timescale | Lead | Progress |
|---|---------------------------|--|--------------------|
| Development of evidence base to support the proposed changes to the policy | October/November 2019 | Housing Needs and Improvements Manager | Completed 7.11.19 |
| Internal consultation on proposed changes | 7 – 22 November 2019 | Housing Needs and Improvements Manager | Completed 29.11.19 |
| Proposed changes amended/agreed following consultation | December 2019 | Assistant Director (Housing Policy & Management) Housing Needs and Improvements Manager | Completed 18.12.19 |
| Proposed changes presented for MT consideration prior to consultation | 4 February 2020 | Assistant Director (Housing Policy & Management) | Completed 28.01.20 |
| Proposed changes presented to Housing Cabinet Committee for approval | February 2020 | Assistant Director (Housing Policy & Management) | |
| Proposed changes incorporated into draft allocation policy | February-March 2020 | Housing Needs and Improvements Manager | |
| Formal consultation period (12 weeks) | April – June 2020 | Housing Needs and Improvements Manager | |
| Notice of key decision published by Committee Section | July 2020 (date tbc) | Housing Needs and Improvements Manager | |
| DPIA completed | June 2020 | Housing Needs and Improvements Manager | |
| Revised policy presented to Management Team | June 2020 (date tbc) | Assistant Director (Housing Policy & Management) | |
| Revised policy presented to Housing Services Cabinet Committee for final approval | 6 July 2020 (date tbc) | Assistant Director (Housing Policy & Management) | |
| Revised policy presented to Chief Executives briefing | 24 August 2020 (date tbc) | Assistant Director (Housing Policy & Management) | |
| Revised Policy presented to | 7 September 2020 | Assistant Director (Housing Policy & Management) | |

| | | | |
|--|----------------|--|--|
| Cabinet for adoption | | Management) | |
| Locata system update to reflect changes | September 2020 | Housing Needs and Improvements Manager | |
| Training for Housing Needs teams/ and wider housing team, procedures updated | September 2020 | Housing Needs and Improvements Manager | |
| Reassessment of existing applicants in line with new scheme | September 2020 | Senior Allocations Officer | |
| Revised Housing Allocation Policy Implemented | October 2020 | Housing Needs and Improvements Manager | |

Part Three: Review

| | |
|--|-----------------|
| Date for Project Post Implementation Review | May 2021 |
|--|-----------------|

Key Questions for Project Review:

To what extent were key outputs delivered?

Were there any other outputs which were delivered in addition/instead of the above?

To what extent were key outcomes met? What is my evidence for this?

Were there any unanticipated outcomes?

What went best in the project?

What would you do differently if undertaking a similar project in the future?