

Housing Allocations Policy

Consultation Summary Report

Why we consulted?

The Housing Allocations Policy is a statutory requirement and it must include a statement of choice and adhere to the “Allocation of Accommodation: Guidance for Local Housing Authorities in England” (June 2012). There has been an amendment to the Housing Act 1996 in the form of the Homelessness Reduction Act 2017, which requires a review of the Council’s current Housing Allocations Policy.

The revised Housing Allocations Policy was developed with engagement from our internal and external partners, key stakeholders and residents and by reviewing new legislation and updated guidance from central government.

The revised Housing Allocations Policy details how the Council’s affordable and social housing will be allocated to those most in need of housing in the district.

Section 166A(13) and 168(3) of the Housing Act requires all stakeholders to be consulted on any changes to a Housing Allocations Policy. We therefore carried out a public consultation for the revised allocations policy over a six week period from 17th March 2020 until 3rd May 2020.

The allocations policy has been changed from a points based system to a banding system which is considered to be a fairer system. It has also been amended so that anyone not meeting the council’s qualifying criteria as set out in the policy, is not able to join the register.

These changes mean that social housing will be allocated to residents of West Berkshire with the highest housing need and ensure that we support the most vulnerable residents in our community. The number of applicants on the common housing register will reduce to reflect only those in true housing need. It will deliver more accurate data to inform the supply of housing that we need to meet current and future demand in the district.

Approach

We published the proposals and questionnaire regarding the changes on our website at www.westberks.gov.uk/housing. The questionnaire was available for a six week period with feedback requested by midnight on 3rd May 2020.

Respondents were directed to the revised policy and a document summarising the changes to read before answering the questionnaire. A total of 234 stakeholders submitted feedback.

Each question related to a specific change in the policy and a reference to the paragraph and page in the policy were included. Alongside this, we set up a dedicated email address to deal with any questions or queries relating to the consultation process including queries relating to ability to access the questionnaire. As a result of this we printed copies of the proposal documents and surveys following enquiries and made them available on request.

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Our approach also included delivering focus groups but due to Covid-19 we were unable to proceed with face to face focus groups.

We also wrote to everyone on the housing register as at 13th March 2020 (around 3,700 households). In addition, letters were also sent to other stakeholders including those resident in temporary accommodation provided by the Council, the voluntary sector, Registered Providers, internal departments and partner organisations notifying them of the consultation and inviting their contributions.

Finally, we issued a press release and further publicised our consultations through our Facebook and Twitter accounts.

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Consultation Response

Number of Responses and main category of respondents

In total 234 responses were received. More than one category could be selected in response to how respondents would describe their housing status. 47% of respondents said they were on the Common Housing Register and 40% of respondents were West Berkshire residents. 2.7% were homelessness applicants and the remainder were living in temporary accommodation provided by West Berkshire Council, a Registered Provider, Statutory Organisation, Voluntary Organisation or other.

The largest percentage of responses were from residents in the age range 25-34 closely followed by 35-44 and 55-64. Of those that responded 33.3% had a disability, long-term illness or health condition. The highest number of responses (46.4%) were from households that had one to two dependants. The second largest category were from households with no dependants at 42.3%. This would indicate that there was a fairly even split of responses from families and single person respondents. To further support this 47.6% of responses were from 1-2 person households and 35% from 3-4 person households.

Summary of Main Points

Overall respondents were in favour of the proposals to change from a points to a bands based system. The only change to the policy that was suggested throughout the responses was to include key workers in the band priorities. Keyworkers have therefore been included with appropriate priority in the Housing Allocations Policy. For the purposes of the Allocations Policy, those considered as keyworkers are as defined in the Thames Valley LEP data source.

A point to note is that the lists of reasons e.g. 'medical' in the different bands are not in any priority order. This is simply a list of the different reasons an applicant would be placed into a particular band.

All of the individual comments from respondents were reviewed and responses for comments made have been broken down by the survey questions below:

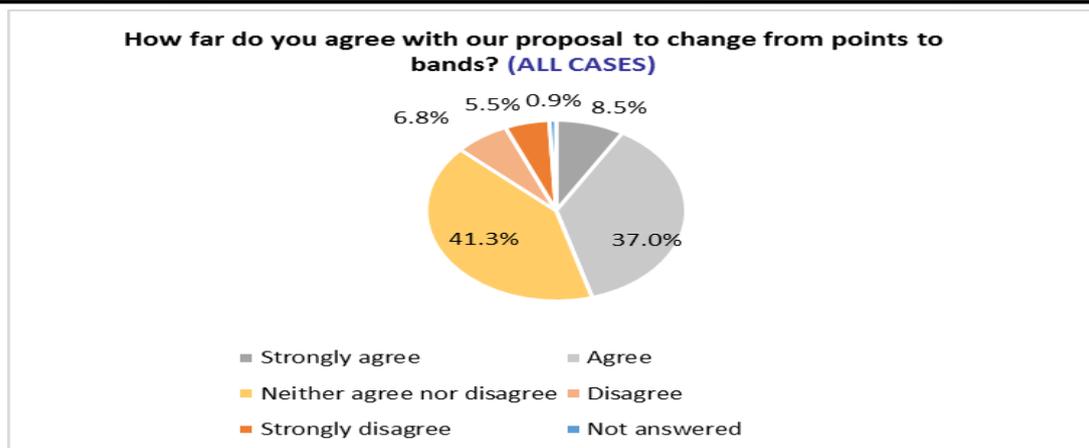
Summary of Responses by Question

1. How far do you agree with our proposal to move from points to bands?

The banding system takes into account the individual circumstances of each applicant household with higher bandings reflecting an emergency or urgent need to move. The new scheme will look at household circumstances at the time they join the register. It will also look at their circumstances at the point any accommodation is successfully bid for and offered to ensure their circumstances remain the same and continue to warrant their current banding.

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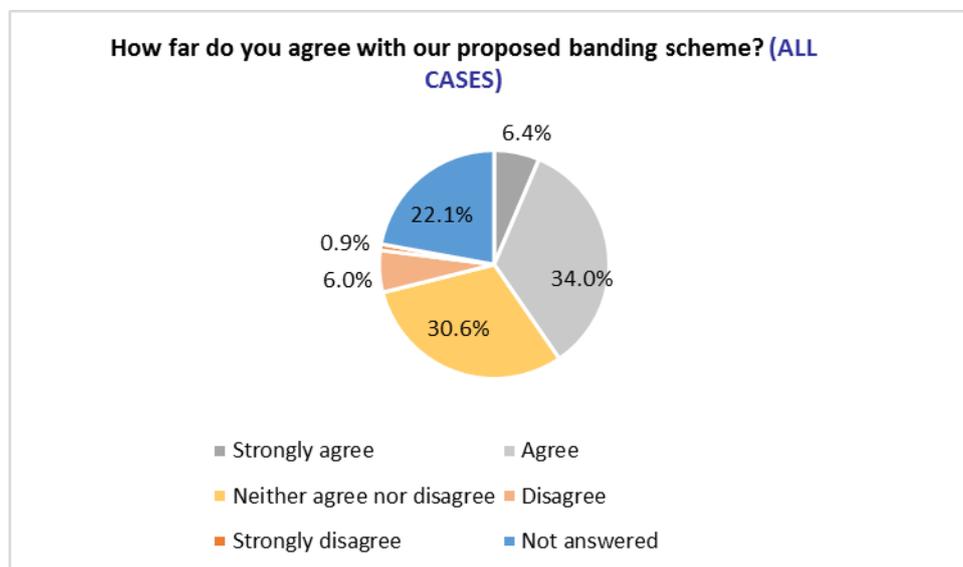
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This data shows that 46% of respondents who had a view were in support of the changes and only 12.3% were against the change. 41.3% of respondents neither agreed nor disagreed with the changes. There were a further 2 respondents who did not answer this question.

2. How far do you agree with our proposed banding scheme?

Respondents were asked how far they agreed with the proposed banding scheme. There was a large number of respondents that did not answer this question (52%) but overall the response was in favour of the proposed banding scheme. 40.4% strongly agreed or agreed with the banding with only 6.9% strongly disagreeing or disagreeing.



A number of specific points were raised and some of these are addressed below:

Comment: Should homelessness not be higher up the banding system? As an emergency need or an urgent need.

Response: Households who are homeless are catered for under the Council's statutory homelessness duties, therefore, the 'crisis' is averted. Similarly those

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needing emergency or temporary accommodation are supported under the Council's statutory homelessness duties.

Comment: You have fostering in band B but you don't mention people that have taken responsibility for a child/children on a special guardianship order or other cases of taking on children.

Response: If you have taken on the parental responsibility for a child e.g. under a special guardianship order, the child is treated as part of your household for the purposes of your assessment for the common housing register. This means that they will count towards overcrowding to determine if there is a need to move to larger accommodation.

Comment: Band A and B - does this include if the property cannot be adapted. Who is the other 'Health Practitioner' mentioned in Band A? How is this information gathered?

Response: If a property cannot be adapted, this would count towards the assessment of the suitability of the current property. Such suitability assessments are supported by reports from qualified health professionals such as, medical doctors, health specialists and occupational health therapists.

Comment: Band A - All new requirements should have a higher priority. Therefore 1) New or freeing up property takes precedence over like for like transfers, 2) Order. No 8 (domestic abuse) should be at no: 5, the rest drop down one position, except 'Management transfer' should be the bottom priority. Bands B, C, D are ok.

Response: Priority for bids for properties will be based on the applicants banding and the date they were first placed into their band. The list of banding reasons within a band are not in any priority order but rather a list of all reasons why the band will be awarded.

A sample of comments in support of the banding scheme:

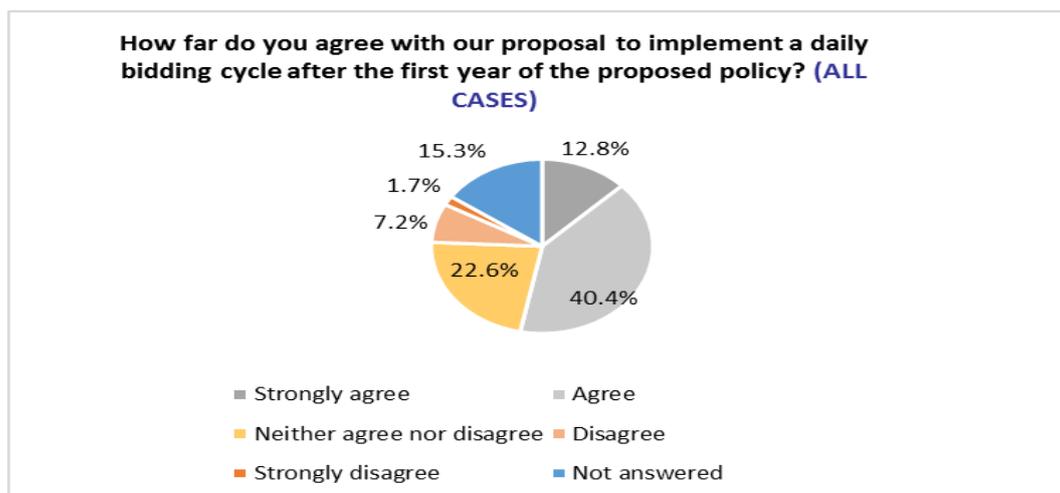
- "Bandings and sub-sections seem reasonable given the difficulty in assessing the varied demands for housing allocation"
- "Consistent with other LAs and in line with Stonewater's own policies especially in what is considered band A".
- "I think the banding will ensure households that are in desperate need of being housed the possibility of being so".
- "It's very well put together, it's aimed mainly at the vulnerable people that would need the help to find a place, to secure their future and it means that the CHR can't be taken advantage of by people that could find and fund their own places".

3. How far do you agree with our proposal to implement a daily bidding cycle after the first year?

Respondents were asked how far they agreed with the proposal to implement a daily bidding cycle after the first year of the proposed policy. More than 53% of respondents agreed with this and less than 9% disagreed or strongly disagreed. 38% did not respond or were in the category of neither agreed or disagreed.

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A number of specific points were raised and these are addressed below:

Comment: “It might be easier for allocations of property, but West Berkshire is spread over a rural area and not everyone has the internet especially if they don’t have a property. Many people use local libraries to go and make bids. This would mean they would have to go daily instead of once weekly”.

Response: Though properties will be advertised daily, each advert will remain open for 7 days. This means in practice that if you check on available properties once a week, you will not lose out on placing a bid for any of the advertised properties.

Comment: “Not everyone has daily access to be able to bid daily”.

Response: In addition to the response above, those who have no access to a computer or smart phone can make use of computers available to the public in our offices or a nearby library.

Comment: Agree, but wonder why properties are removed after a week even if there have been no bids

Response: Properties that no one bids for are sometimes withdrawn and could be offered directly to a household who have been identified as needing such accommodation.

A common theme from the comments: how the vulnerable will be supported with such a system.

Response: The most vulnerable will receive additional support to bid over the phone or in person at our offices.

4. How far do you agree with our proposal to close the housing register to the following applicants?

Respondents were asked about closing the register to the following groups:

- West Berkshire Residents

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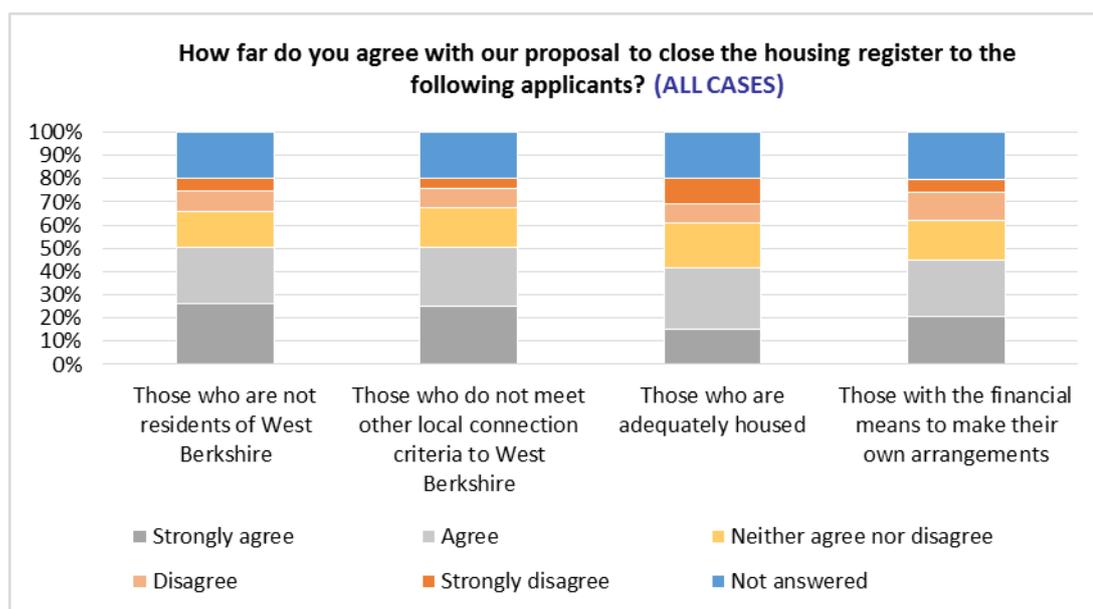
- Those without a local connection
- Those adequately housed
- Those with the financial means to make their own arrangements.

19% to 23% of respondents had no opinion on this question or did not respond.

63% either agreed or strongly agreed to close the register to those who are not residents or have no local connection and only 16% – 18% disagreed or strongly disagreed to these two changes (see bars one and two on the chart below).

52% strongly agreed or agreed with closing the register to those that are adequately housed and 56% strongly agreed or agreed with closing the register to those that can make their own financial arrangements (see bars three and four on the chart below). 24% and 22% disagreed or strongly disagreed with these two points of the proposal.

Overall the support is in favour of closing the register to these four categories of applicants.



A number of specific themes from the comments are addressed below:

Comments: A few people said that a social tenancy gives them the opportunity to save for a deposit to buy a property rather than private rent and should be given a council property to enable them to save.

Response: Social housing is a scarce resource and our aim is to ensure that it is targeted at the most vulnerable residents of West Berkshire and those in the highest housing need. There are schemes in place such as, shared ownership schemes and 'Help to buy scheme' to assist in home ownership.

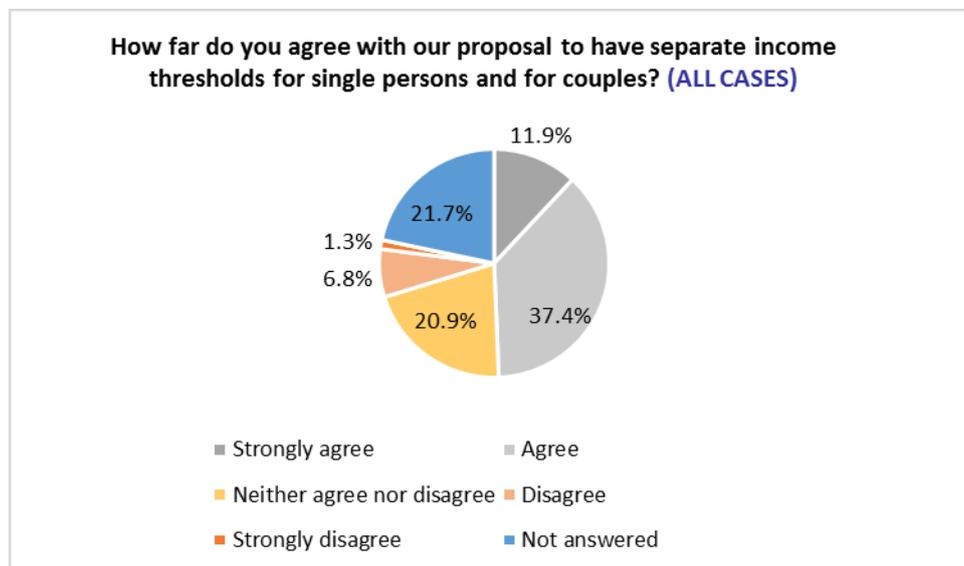
Comment: "I think you need to define what you mean by adequate house in the policy because currently I have adequate housing according to current policy".

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Response: This is defined by legislation notably the Housing Act 1996. It is essentially, anyone who does not have a housing need and will include those who privately rent.

5. How far do you agree with our proposal to have separate income thresholds for single persons and for couples?



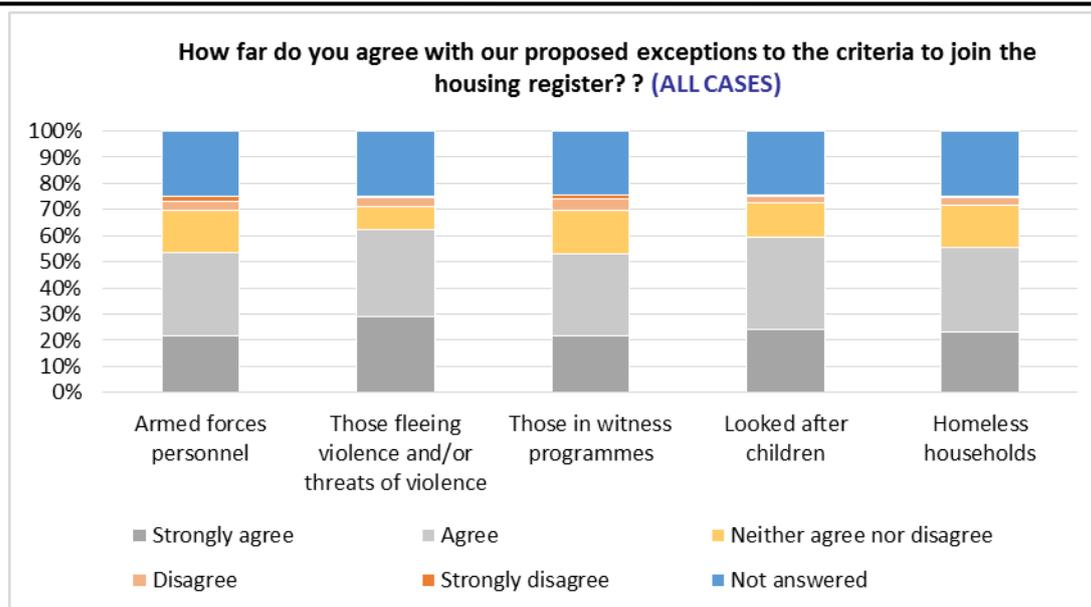
Nearly 50% of respondents agree or strongly agree with the separate income thresholds. Only 1.3% strongly disagreed.

A few comments indicated some misunderstanding about how the thresholds will work. The earnings threshold is the limit above which persons will not qualify to join the register. This means if a single person earns less than £44,000, they are eligible to join the register. The register is therefore open to West Berkshire residents who are on low income and closed to those who are on high income and therefore considered to have the financial means to make their own housing arrangements.

6. How far do you agree with our proposed exceptions to the criteria to join the housing register?

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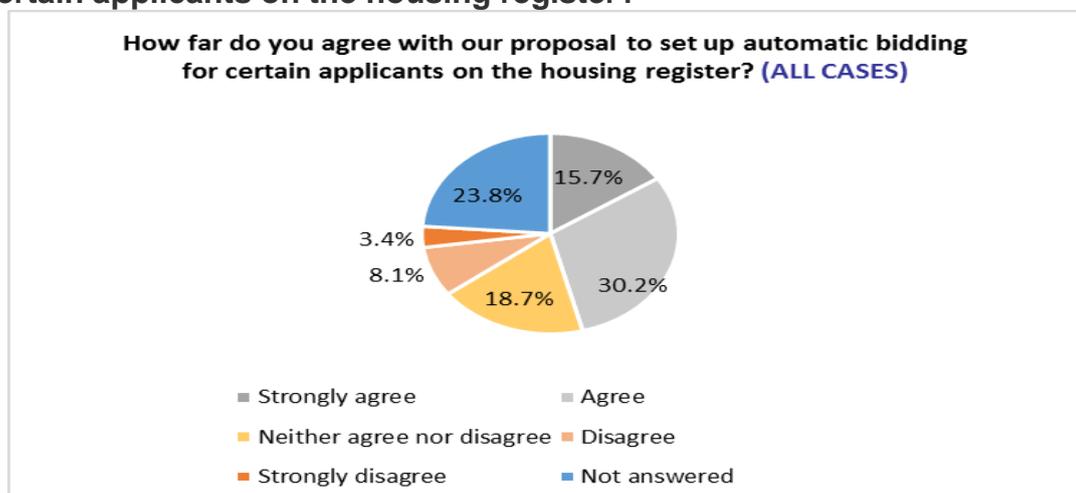
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There are exceptions to the main criteria for some categories of people joining the register. These include; Armed forces personnel, those fleeing violence and/or threats of violence, those in witness protection programmes, looked after children and homeless households. Anyone who is employed in the area for a sustainable period (at least two years) is exempt from the local connection rules; this includes nurses and keyworkers. It is helpful to know that people who have moved into the area intend to continue to stay in the area when accessing scarce social housing. The other qualifying criteria will still apply to everyone who wishes to join the register e.g. if you have the financial means to resolve your housing issues, you will not qualify despite being exempted from the local connection rule.

Overall only 0.6% to 2.3% strongly disagreed and 2.8% to 5.6% disagreed with the exceptions. 11% to 22% neither agreed nor disagreed with the remaining respondents agreeing or strongly agreeing with the criteria. The majority of responses were in agreement.

7. How far do you agree with our proposal to set up automatic bidding for certain applicants on the housing register?

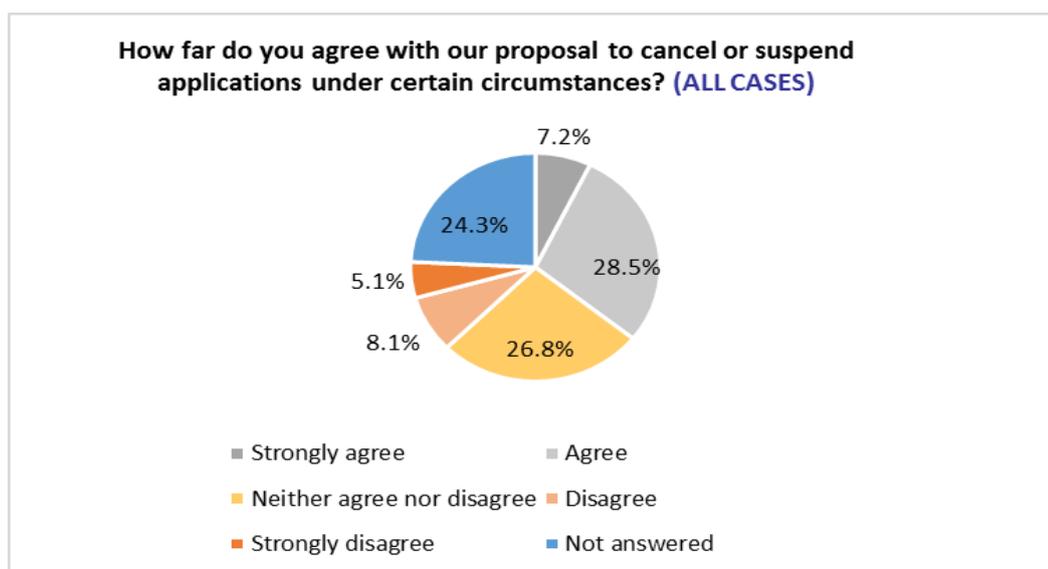


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Nearly 46% strongly agree or agree with automatic bidding. Only 11.5% strongly disagree or disagree to this. This shows that there is strong support for this proposal. There were no comments for this question.

8. How far do you agree with our proposal to cancel or suspend applications under certain circumstances?



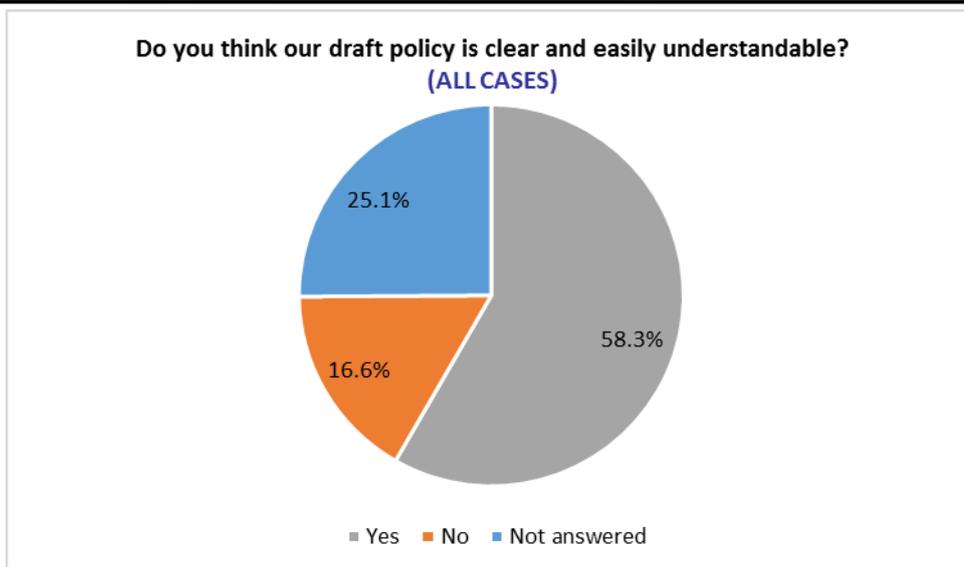
Nearly 36% of respondents agree with the proposal to cancel or suspend applications under certain circumstances. There are a large majority that either did not answer this question or marked neither agree or disagree. On the whole the support is in favour of this proposal.

Taking into account comments for this question, it is necessary to mention that the circumstances where applications will be cancelled or suspended are clearly detailed and include refusals of suitable offers of accommodation under the scheme. Consideration of reasons for refusal will take into account the individual's circumstances, including their mental health.

9. Do you think our draft policy is clear and easily understandable?

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Just under 60% feel that this policy is clear and easy to understand. A quarter of respondents did not answer whilst 16.6% of the respondents felt the policy was not clear. Some feedback indicated that there was too much detail in the policy however we felt it is important to set out as much detail about how the banding scheme will work in practice. A summary of the allocations scheme will always be available for ease of reference for those who find the detail to be too confusing.

A number of specific themes arising from the comments are addressed below:

Comment: Why do we need to collect equalities data referred to in section 33.3 of the policy?

Response: The details collected in an application are used for monitoring purposes only as stated in section 33.3. The allocation of properties is based on the priority of those who have bid on the property as stated in section 12.2 and section 27.

Comment: “Being in a certain age bracket is not a need. If a property is suitable for someone with disabilities, then age should not come into it”.

Response: Certain properties are age restricted because they are part of a supported accommodation scheme. Where a property has adaptations, priority for such properties will be given to those who need the adaptations.

Comment: The draft policy doesn't mention housing for the over 55year olds

Response: Properties will continue to be advertised with specific restrictions e.g. age restrictions as at present. Only those that meet the criteria for the property will be allowed to bid for it. See section 25.2.

Member and other stakeholder responses

Health and Wellbeing Board: There was very positive support for the allocation policy particularly from Health Watch and CCG. The only comments were around built in flexibility to take account of unforeseen circumstances and overcrowding and how that would be treated under the policy.

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Response: Banding for any unforeseen circumstance is not covered in the current scheme but will be at the discretion of the Housing Service Manager and will be determined by whether the applicant has an emergency, urgent, medium or low need to move.

Newbury Locality Management Team (LMT): The draft Housing Allocations Policy was discussed at a virtual meeting of the LMT on 7 May 2020, following its presentation to the Health and Wellbeing Steering Group on 30 April 2020. The membership of the LMT comprises officers from the CCG and senior GPs working across West Berkshire. They supported the approach outlined in the policy. They did, however, want to see some consideration given to an applicant's status as a key worker. The Health and Wellbeing Board and wider system have long discussed the difficulty that many workers in health and social care face in terms of housing affordability. The LMT felt that there was an opportunity to address this in the policy.

Response: This has been taken on board with reasonable preference given to keyworkers. See the response on page 3 under the 'summary of main points' section.