

SOCIAL HOUSING ALLOCATION POLICY - CONSULTATION DRAFT

Cabinet Member(s)	Councillor Eddie Lavery
Cabinet Portfolio(s)	Residents Services
Officer Contact(s)	Debby Weller - Central Services
Papers with report	Appendix A: Hillingdon Council Social Housing Allocation Policy, July 2023, Consultation Draft

HEADLINES

Summary	<p>Hillingdon Council is required to have a housing allocation scheme in place to assess housing need, advertise available social housing and allocate properties to households in need.</p> <p>This report to Cabinet presents proposed updates and changes to Hillingdon’s Social Housing Allocation Policy to ensure it remains up to date and meets the needs of residents. The changes will bring greater transparency and clarity to those households who are a priority for re-housing, including continued priority for residents with 10 or more years’ continuous residency; to extend options to a wider range of households to relieve overcrowding; and ensure that the most vulnerable groups are supported by the policy, for rehousing.</p> <p>Cabinet is asked to consider and approve the proposed changes to the Social Housing Allocation Policy for a period of consultation and to agree to receive the consultation findings and final policy at the Cabinet meeting in November 2024.</p>
Putting our Residents First Delivering on the Council Strategy 2022-2026	<p>This report supports our ambition for residents / the Council of: Live in good quality, affordable homes in connected communities This report supports our commitments to residents of: Thriving, Healthy Households</p> <p>This report supports our Housing Strategy 2021/22 to 2025/26 and our Homelessness and Rough Sleeping Strategy 2019 to 2024</p>
Financial Cost	There are no direct financial implications arising from the recommendations to this report
Select Committee	Residents’ Services Select Committee
Relevant Ward(s)	N/A

RECOMMENDATIONS

That the Cabinet:

- 1) Approves the Draft Hillingdon Council Social Housing Allocation Policy July 2024 included at Appendix A, for consultation.**
- 2) Agrees to receive the findings of the consultation and any proposals for subsequent changes to the policy for consideration at the Cabinet meeting in November 2024.**

Reasons for recommendation

The revised Hillingdon Council Social Housing Allocation Policy will make changes to the way in which applications for social housing are assessed and prioritised to determine the priority banding of each application. The proposed changes will ensure greater transparency around those that are a priority for rehousing and seeks greater priority for residents with a long-term attachment to the Borough. Social Housing is a scarce resource, that is in short supply. Through these changes we seek to make the best use of the stock available to us through prioritisation of those giving up larger properties or those needing to decant from their homes, and through allowing households that are severely overcrowded to move into homes that relieve some of the pressure, reduce waiting times and allow families to make decisions on what best meets their needs. This report seeks approval from Cabinet to enter a consultation process to seek feedback from stakeholders, residents and current housing register applicants. A further report detailing the outcome of the consultation, an equalities impact assessment, final policy and timeline for implementation will be presented to Cabinet in November 2024.

Alternative options considered / risk management

Councils are required to have a mechanism to assess housing need, advertise available social housing and allocate properties to households in need. Although there have been some minor changes made to the Social Housing Allocation Policy, it has not been comprehensively updated since 2013. Overtime some weaknesses have emerged in the ability of the policy to respond to housing need and to enable the Council to fulfil its functions in an efficient and effective manner. For instance, two thirds of those on the register are in bands A and B, making it more difficult to identify priorities. For this reason, the option of leaving the policy as at present has not been considered, however, the draft policy may change in response to consultation feedback.

Select Committee comments

None at this stage.

SUPPORTING INFORMATION

1. Councils are required to have in place an allocation scheme for determining priorities between applicants for housing which sets out the procedure to be followed when allocating social housing. The Hillingdon Social Housing Allocation Policy determines who can join the housing register for social housing and the level of priority that will be awarded based on an applicant's circumstances. It provides a framework to determine eligibility, qualification and prioritisation of applications for social housing properties via the Housing

Register (Choice Based Lettings Scheme). The allocation policy applies to accommodation that the Council owns and to nominations that the Council makes to other affordable and social homes, such as those owned by Housing Associations.

2. The Hillingdon Social Housing Allocation Policy is used by Hillingdon Council and its partner housing associations to allocate social housing using Locata Choice Based Lettings. The Housing Register currently has four main bands A, B, C, D. Within band A, prioritised ahead of other applicants are A1 (Permanent Decants), A2 (Under occupiers) and A3 (Management Transfers).
3. A comprehensive review has not been undertaken since 2013 and some elements of the policy require updating. A commitment to do this was included in the Hillingdon Council Housing Strategy 2021/22 to 2025/26. One of the main purposes of this review is to reduce the congestion in Bands A and B to allow for more effective prioritisation. For the same purpose, greater clarity is sought for the prioritisation of key groups i.e. the more vulnerable care experienced young people moving on from social care; vulnerable single people moving on from homeless supported accommodation recommended for social housing by the Single Homeless Move On Panel; and people moving on from other types of social care supported housing accommodation including for mental health and learning disabilities. In addition, there are some minor amendments needed to stay up to date with legislation and ensure coherence with other Hillingdon strategy documents.
4. A revised Hillingdon Social Housing Allocation Policy has been drafted and is included at Appendix A. All proposed changes are marked up on the document, using track changes. This report seeks approval from Cabinet to enter a consultation phase to seek feedback from stakeholders, residents and current housing register applicants on the proposed new policy. A further report detailing the outcome of the consultation, an equalities impact assessment, final policy and timeline for implementation will follow for consideration to Cabinet in November 2024.

Headline Housing Register and Social Housing Lettings Summary Data

5. At the end of March 2024 there were 3896 households on the housing register. Two thirds of those registered were in bands A and B.

Housing Register by Band at March 2024						
Beds	All	1	2	3	4	5
Band A1 (Permanent decant)	7	3	1	2	1	0
Band A2 (Under occupier)	217	120	77	16	3	1
Band A3 (Management transfer)	46	25	4	9	8	0
Band A	485	93	104	166	121	1
Band B	1791	313	551	743	183	1
Band C	893	498	250	126	19	0
Band D	457	175	162	89	31	0
Total	3896	1227	1149	1151	366	3
<i>Total in Bands A or B</i>	<i>2546</i> <i>(66%)</i>	<i>554</i> <i>(45%)</i>	<i>737</i> <i>(64%)</i>	<i>936</i> <i>(81%)</i>	<i>316</i> <i>(86%)</i>	<i>3</i> <i>(100%)</i>

6. There is a fairly even spread of those needing one, two or three bed homes ranging from 1149 to 1151 and there are 366 requiring four bedrooms or more. The proportion of households registered in the higher bands A and B increases with bedsize need.
7. By far the most common reason for being on the housing register is overcrowding. This accounts for 1857 or 48% of those registered. The percentage is higher for larger families with overcrowding accounting for 64% of registrations for those who need 3-bedroom properties and 63% of those needing 4 or more bedrooms.
8. Between April 2023 and March 2024 there have been 401 social housing lettings¹ and a further 165 lettings that have been used as shortlife temporary accommodation, giving a total 566. This compares to 636 in 2022/23.
9. The following table provides a breakdown of the social housing lettings from April 2023 to March 2024.

¹ Provisional

Beds	All	1	2	4	4
Homeless	148	61	47	29	11
Transfers	86	51	14	13	8
General Housing Register	107	82	17	7	1
Extra Care	60	60	0	0	0
All Social Housing Lettings	401	254	78	49	20
Shortlife Temporary Accommodation	165	58	58	35	14
Total Lets	566	312	136	84	34

10.A more comprehensive analysis of lettings will be provided with the final report in November and will inform an equality impact assessment.

Proposed changes

Method of Awarding Additional Priority

11.A key reason for reviewing the policy is that the priority bands have become congested, with the majority of applicants being in the higher priority groups of Bands A and B. This is not allowing for sufficient differentiation between applicants to allow for effective prioritisation.

12.The current policy awards additional priority to:

- Couples aged over 21 without children
- 10 years' continuous residency
- Working households
- Member of the British Armed Forces who have continuously resided in the borough for 10 years prior to signing up for the service and have not been dishonourably discharged.

13.For those qualifying for additional priority under the last bullet point a Band A is awarded and there are no proposals to alter this. The other 3 additional priorities are currently all awarded by moving one Band up i.e. Band D becomes C, Band C becomes B, and Band B becomes A. This has resulted in high numbers of applicants in Bands A and B.

14.Of the 3896 on the housing register, 40% have a banding enhancement due to additional priority.

Band	Total	With Additional Priority	Without Additional Priority
A1 (Decant)	7	0	7
A2 (Under-Occupation)	217	89	128
A3 (Management Transfer)	46	0	46
A	485	260	225
B	1791	1195	596
C	893	0	893
D	457	0	457
Total	3896	1544	2352

15. It is proposed that each priority reason for banding on the housing register be two tiered so those with additional priority being awarded the higher-level band, as opposed to the current situation of moving up a Band.
16. It is also proposed that we reduce the additional priority categories to those below. Only one additional priority would be able to apply to a case, this would not be cumulative to allow a household to increase two additional bands.
- 10 years' continuous residency
 - Member of the British Armed Forces who have continuously resided in the borough for 10 years prior to signing up for the service and have not been dishonourably discharged.
17. The revised bands would be numbered 1 – 14 with each priority banding reason being two tiered to give enhanced priority to those who meet the additional priority criteria. This will enable a balanced approach in rewarding long-term residency while assisting in meeting the most pressing needs of residents and provide greater visibility of priorities.
18. The estimated impact on the housing register of making the changes is shown in table below.

Revised Bands	Total	Previously
1	0	A1 (Decant) with additional priority
2	7	A1 (Decant) without additional priority
3	90	A2 (Under-Occupation) with additional priority
4	127	A2 (Under-Occupation) without additional priority
5	2	A3 (Management Transfer) with additional priority
6	44	A3 (Management Transfer) without additional priority
7	155	A with additional priority
8	70	A without
9	260	B with additional priority
10	596	B without
11	1195	C with additional priority
12	893	C without
13	0	D with additional priority
14	457	D without
Total	3896	

Priority Groups

19. To make sure that particular priority need groups recognised by the Council are successful in achieving lettings the Band awarded has been increased from B to band 7 (Band A equivalent) for those with additional priority and band 8 (Band A equivalent) for those without. This banding will apply for vulnerable care experienced young people and for people moving on from social care supported accommodation including for mental health and learning difficulties. Band 7 & Band 8 will also be awarded for vulnerable single people

moving on from homeless supported accommodation based on recommendation of a social letting from the Single Homeless Move On Panel.

Overcrowding

20. The current social housing allocations policy allows households with a four-bedroom assessed need to be able to bid for three-bedroom properties so long as this does not result in statutory overcrowding.
21. It is proposed that we extend that further to other bed size need groups so long as it results in an improved situation for the family and does not result in statutory or severe overcrowding. This would mean that a family in a one-bedroom property that required a three-bedroom property would be able to bid and move into a two-bedroom property to relieve some of the overcrowding within the home.

Housing Register at end March 2024:

Need	Total	Main reason Overcrowding
1 bed	1227	219
2 bed	1149	665
3 bed	1151	742
4+ bed	369	231
Total	3896	1857*

*76% in bands A and B

Other amendments

22. Other proposed amendments to the Social Housing Allocation Policy are minor and are referenced in the table below. The policy changes are marked up on the proposed amended policy attached at appendix A.

Section	Change
Various	The Council altered to Hillingdon Council throughout
Summary	A summary section has been included at the start of the policy to aid clarity
1.1	List of relevant legislation updated
1.2	Reference to fixed term tenancies removed as only needs to say in accordance with the Tenancy Strategy
2.1	Bullet points relating to eligibility rules updated
2.2.3	Qualifying criteria related to hardship has been more clearly worded. A previous exclusion relating to people over 60 living outside Hillingdon has been removed so that the qualification relates only in instances where there is a legal obligation. It is also clarified that an employment offer means full time employment

2.2.4	<p>It has been clarified that for continuous residence, periods away for study that will be disregarded are for a period of 3 years rather than 3 times.</p> <p>Care leavers now referred to as care experienced young people throughout.</p> <p>Care experienced young people will be regarded as having a local connection if they live in or outside the borough as required by statutory homelessness guidance.</p> <p>Additional exceptions to the local connection criteria have been included for social tenants who (i) need to move to take up a job or live closer to work as required by the Right to Move regulations or (ii) have move away while being held on remand.</p>
4.1	The list of Locata partners has been removed as it is not necessary to keep this information up to date in the Social Housing Allocation Policy.
5.1	Although those with savings of £30,000 or more are excluded under qualifying criteria, this cannot be applied where the applicant falls within a reasonable preference category. In this instance, those who have savings over £30,000 will be placed in Band 13 or 14.
5.2	<p>Stipulates that the separation of Bands between those with or without an additional priority categorisation will apply before date order.</p> <p>Error corrected on example 3 regarding band date.</p>
5.4	Information regarding help with bidding has been brought up to date with current practice and bidding cycles.
5.11	Section on Local lettings policies updated to provide greater discretion on when they may be used and provide improved readability.
6.	Reference to Lettings Plan updated in line with Section 9
9	The policy has been amended to enable the Council to produce a Lettings Plan as and when required rather than annually.
10.2, 10.3 & 10.4	Information regarding who can and who should not be included on the social housing application has been updated. This is to ensure consistency with the Tenancy Policy and Tenancy Strategy and is line with legal advice.
11.2	<p>Further clarity has been provided in the table of examples given relating to family composition and the number of bedrooms for which they will be considered. This follows a recommendation given during a recent Housing Ombudsman case in which the Council was successful.</p> <p>A paragraph has been included regarding the importance of notifying the Council of any changes.</p>
12.1	<p>Additional text has been included to make reference to the awarding of Band 7 via the Single Homeless Move On Panel to meet the needs of those who are particularly vulnerable.</p> <p>Definition of Bed & Breakfast as nightly paid accommodation added.</p>
14	Text regarding Additional Priority has been amended to reflect the proposal for Bands to be two tiered to differentiate between those with

	or without additional priority as set out above under 'Method for Awarding Additional Priority'.
15.1	Table showing waiting times removed and sentence added confirming that this will be published annually on the council's website.
Social Housing Allocation Summary Table	Section added to summarise Additional Priority Main table amended in line with proposals.

Financial Implications

There are no direct financial implications arising from the recommendations to this report.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities?

By reviewing the Social Housing Allocation Policy the Council has given renewed consideration to the prioritisation of social housing allocations and provided increased clarity for residents. A comprehensive equality impact assessment and inclusive consultation process will follow.

Consultation carried out or required

Substantive changes to the Social Housing Allocation Policy require a period of consultation. The Council is legally required to consult with Housing Associations operating in the Borough, and it is also important to seek views and feedback for other partners, stakeholders, residents and current housing register applicants. The feedback received will enable amendments to be considered for inclusion in the policy ahead of a final version to be considered by Cabinet in November 2024. The feedback will also contribute to the completion of a thorough equalities impact assessment, which will be considered by Cabinet alongside the revised policy.

There is no statutory timeline for consultation, however the Council must provide reasonable opportunity for feedback on the proposals.

This report seeks approval to begin a ten-week consultation period which will commence on 5th August and close on 13th October 2024.

The consultation will include:

- Use of the Council's website, social media channels
- A survey will be made available for respondents to provide feedback on the draft policy
- Individual and group events will be held to gather feedback from key stakeholders

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance have reviewed this report and concur with the Financial Implications set out above, noting there are no direct financial implications associated with the recommendation in this report.

Legal

By section 166A(1) Housing Act 1996, Local authorities are required to have an allocation scheme determining priorities for the allocation of accommodation and the procedures to be followed.

In preparing or modifying its allocation scheme, the Council must consult and have regard to its homelessness strategy, its tenancy strategy, any statutory guidance on allocations, the London housing strategy and its public sector equality duty.

There is no legal impediment to the Council consulting on the revised Hillingdon Social Housing Allocation Policy as proposed.

BACKGROUND PAPERS

NIL