

HOUSING ALLOCATION POLICY CONSULTATION DRAFT

| | |
|---------------------------|---|
| Committee name | Residents' Services Select Committee |
| Officer reporting | Debby Weller - Head of Housing Strategy and Policy |
| Papers with report | Appendix A: Consultation Plan Appendix B: Draft Social Housing Allocation Policy |
| Ward | All |

HEADLINES

This report provides detail of the current consultation for a revised social housing allocation policy, and information regarding the consultation process.

RECOMMENDATION:

That the Residents' Services Select Committee reviews and comments on the draft policy and consultation process

SUPPORTING INFORMATION

1. On 25 July 2024 Cabinet agreed an updated Social Housing Allocation Policy for consultation. The 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.
2. The proposed changes to the policy aim to make it more transparent for the Council and residents. The revised 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 changes will ensure greater transparency around those that are a priority for rehousing and seek 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.
3. The consultation runs from 5 August 2024 through to 13 October 2024 and includes:
 - 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

See Appendix A for full consultation plan.

4. 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.
5. 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).
6. 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.

Headline Housing Register and Social Housing Lettings Summary Data

7. 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 (66%)</i> | <i>554 (45%)</i> | <i>737 (64%)</i> | <i>936 (81%)</i> | <i>316 (86%)</i> | <i>3 (100%)</i> |

8. 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.
9. 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.
10. Between April 2023 and March 2024 there were 401 social housing lettings and a further 165 lettings that were used as shortlife temporary accommodation, giving a total 566. This compares to 636 in 2022/23.
11. The following table provides a breakdown of the social housing lettings from April 2023 to March 2024.

| 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 |

12. 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

13. 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.

14. The current policy awards additional priority to:

- Couples aged over 21 without children
- 10 years' continuous residency

- Working households
- Members 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.

15. 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.

16. 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 |

17. It is proposed that additional bands are created on the housing register so that each existing priority level is two tiered with additional priority being awarded the higher of two band levels.

18. 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.

19. It is also proposed that we reduce the additional priority categories to those below:

- 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.

20. The estimated impact on the housing register of making the changes is shown in the 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

21. 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

22. 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.

23. 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: Bedsize Need | Total | Main reason Overcrowding |
|--|-------------|--------------------------|
| 1 bed | 1227 | 219 |
| 2 bed | 1149 | 665 |
| 3 bed | 1151 | 742 |
| 4+ bed | 369 | 231 |
| Total | 3896 | 1857* |

Other amendments

24. Other proposed amendments to the Social Housing Allocation Policy are minor and are referenced in the table below.

| 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 | 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. Care leavers now referred to as care experienced young people throughout. 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. 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. |
| 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 | Stipulates that the separation of Bands between those with or without an additional priority categorisation will apply before date order. Error corrected on example 3 regarding band date. |
| 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 in line with legal advice. |
| 11.2 | 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. A paragraph has been included regarding the importance of notifying the Council of any changes. |
| 12.1 | 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. Definition of Bed & Breakfast as nightly paid accommodation added. |
| 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 |

RESIDENT BENEFIT

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.

BACKGROUND PAPERS

[Consultation Draft Social Housing Allocation Policy](#)

Appendix A

Draft Social Housing Allocation Policy Consultation

1. Introduction

This paper sets out the plan for organising and undertaking the consultation process for the Social Housing Allocation Policy – July 2024.

2. Purpose / Objectives of the consultation

To complete a consultation process for the draft Social Housing Allocation Policy (July 2024) that will meaningfully inform the final version of the policy to be presented to Cabinet / Council.

The consultation process should:

- Be legally compliant (minimum 6-week consultation).
- Promote and raise understanding of the policy to residents, partners and other stakeholders.
- Gather valuable insight in a range of ways from a representative cross-section of residents, partners and other stakeholder to inform the final version of the policy.

3. Design Principles

The following principles have been used to design the consultation approach:

- To be proportionate to requirements.
- Provide 'self-serve' digital feedback options to participate in the consultation, for the convenience of residents and partners.
- Provide for easy read and inclusive consultation approaches, where required.
- Using existing networks of groups and partnerships.
- Enable opportunities for providing structured views and responses to open dialogue, where required.

4. Timeline

- 25th July 2024 - Cabinet approval to consult
- 5th August 2024 – Consultation commences
- 24th September 2024 – Residents' Service Select Committee (report deadline 12th September)
- 13th October 2024 – Consultation concludes
- 18th October 2024 – Analysis of consultation results
- 21st October 2024 – Draft Cabinet report circulated – with consultation findings and updated policy
- 7th November 2024 – Consultation responses and final policy presented to Cabinet.

5.Methodology

Structured electronic survey questionnaire (Appendix 1)

A copy of the draft policy published on the Hillingdon Council website, with a link to an electronic survey form and an offer to provide the survey in different formats and translations, on request. See appendix 1 for a copy of the questions.

Promotion of the survey via various channels, including Hillingdon People magazine, e-newsletters, local media and the council's social media channels with a link to the survey form. Posters with a QR code link to the survey will also be placed across council buildings, libraries and housing estates.

Partners (see appendix 2)

Writing directly to a range of partner organisations inviting their comments on the draft policy.

This will include:

- All schools, colleges, universities
- Business partners via existing networks
- Existing community groups, faith groups
- Voluntary sector networks
- Housing and support providers

Residents

Writing directly to residents who have expressed an interest in participating in council-run surveys. Writing to all residents' associations to invite participation.

An offer to attend association meetings (or several meetings inviting representatives), if required.

Select Committees

Attendance at Residents' Services Select Committee

6.Roles and Responsibilities

| Ref | Name | Role | Responsibilities |
|-----|---------------|---|--|
| 1 | David Harris | Web & Digital Team | Create web-page. |
| 2 | Callum Devine | Communications | To lead on the PR, social media promotion and monitor any comments via social media. |
| 3 | Marion Finney | Engagement with residents and tenants' associations | To support the design of the questionnaire, the creation of the survey tool and the analysis of results. |

| | | | |
|----|-----------------------------|---|---|
| 4 | Fiona Gibbs | Engagement with faith / community groups | To use existing networks to engage with groups to promote the policy and encourage feedback. |
| 5 | Marion Finney | Engagement with residents and tenants' associations | To use existing networks to engage with groups to promote the policy and encourage feedback. |
| 6 | Nigel Cramb | Promotion to business partners | Using existing contact details, promote the policy and encourage feedback. |
| 7 | Rani Dady | Promotion to all schools and HEs and universities | To circulate the survey link to all head teachers, governors and senior leaders |
| 8. | Debby Weller & Sachin Patel | Consult with council staff and housing associations and homelessness pathway partners | Discuss allocation policy changes in existing meeting structures and arrange specific consultation sessions |

7. Monitoring & Tracking

| Communication Method | No. of posts/emails/posters | No. of Responses |
|-----------------------------------|--|--|
| Social media posts (all channels) | 2 posts on all except nextdoor which was 1 post. | By w.e 23/8/24 – 2,988 clicks on Facebook; 1,497 reach on Instagram; 49 clicks on Twitter/X; 2,204 impressions Nextdoor. |
| Staff emails | <ul style="list-style-type: none"> 14/08/24 – Tenancy Management, Housing Options, Fiona Gibbs, Rani Dady, Nigel Cramb 19/0824 – All staff email | |
| Resident emails | <ul style="list-style-type: none"> TBC | |
| Posters | <ul style="list-style-type: none"> Libraries boroughwide Middx Pharmacy Group - to display across the borough. Sheltered Housing and | |

| | | |
|---------------|--|------------------------------|
| | <p>Extra Care.</p> <ul style="list-style-type: none">• Our tower block estates.• 55/57 noticeboards across the borough. | |
| Online Survey | | w.c 09/09/24 – 224 responses |