

SOCIAL HOUSING ALLOCATION POLICY

Cabinet Member & Portfolio	Cllr Steve Tuckwell Cabinet Member for Planning, Housing & Growth
Responsible Officer	Dan Kennedy, Corporate Director Central Services
Report Author & Directorate	Debby Weller, Central Services
Papers with report	Appendix A Consultation Report Appendix B Equality Impact Assessment Appendix C Revised Social Housing Allocation Policy

HEADLINES

Summary	<p>In July 2024 Cabinet approved for consultation proposed changes to Hillingdon's Social Housing Allocation Policy. The aims of the changes are to provide for:</p> <ul style="list-style-type: none">• A clearer framework for prioritising applications;• Continued priority for residents with 10 or more years continuous residency;• Extending options to a wider range of households to relieve overcrowding;• Ensuring the most vulnerable groups are supported by the policy for rehousing. <p>This report presents to Cabinet the findings of the public consultation along with an equality impact assessment. Overall, the consultation findings have been positive, with 62% to 75% of respondents agreeing or strongly agreeing with each of the proposed changes.</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</p> <p>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	<p>There will be some financial implications related to the need make changes to IT systems for the implementation of the new policy which have been estimated by the systems provider to be between £5k-£10k, which can be met from within existing resources.</p>

Select Committee

Residents' Services Select Committee

Ward(s)

All

RECOMMENDATIONS

That the Cabinet:

- 1) Consider the outcome of the consultation detailed in the Consultation Report at Appendix A.
- 2) Consider the findings of the Equality Impact Assessment at Appendix B.
- 3) Approve the revised Hillingdon Council Social Housing Allocation Policy at Appendix C.

Reasons for recommendation(s)

1. In July 2024 Cabinet approved a revised Social Housing Allocation Policy for consultation. The consultation is now complete and is detailed at Appendix A. An Equality Impact Assessment has been completed and is included at Appendix B. Both documents support the proposed changes which 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. The proposed changes make the best use of the stock available 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.

Alternative options considered / risk management

2. Councils are required to have a mechanism to assess housing need, advertise available social housing and allocate properties to households in need. The Social Housing Allocation Policy has not been comprehensively updated since 2013 and 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.

Democratic compliance / previous authority

3. In July 2024 Cabinet approved the Draft Hillingdon Social Housing Allocation Policy for consultation. Cabinet also agreed to receive the findings of the consultation and any proposals for subsequent change to the policy for consideration at this Cabinet meeting in November 2024.

Select Committee comments

4. The Residents' Services Select Committee reviewed the draft policy and consultation process on 24th September 2024. The Committee asked officers to consider expanding the consultation approach to ensure the process captured a representative range and depth of views, to balance the views gathered through the on-line survey. Whilst no formal comments were submitted to Cabinet, their discussion on the matter can be seen in the minutes of the meeting [available here](#) or under the background papers.

SUPPORTING INFORMATION

Background

5. In July 2024 Cabinet approved commencement of consultation on a revised Social Housing Allocation Policy. This report presents the consultation results and an Equality Impact Assessment and the revised policy. The consultation closed on 20th October and included a wide range of different channels to promote the consultation and promote participation:
 - Use of the Council's website, email distribution and social media channels;
 - A survey online and with paper options for respondents to provide feedback;
 - Individual and group events to gather feedback from key stakeholders.
6. The aims of the changes are:
 - A clearer framework for prioritising applications;
 - Continued priority for residents with 10 or more years continuous residency;
 - Extending options to a wider range of households to relieve overcrowding;
 - Ensuring the most vulnerable groups are supported by the policy for rehousing.

Recap of the proposed changes

7. The proposed changes to the Allocation Policy were described in full in the report in Cabinet in July 2024. These are briefly recapped below. A number of minor changes were detailed in the July Cabinet report. All changes are shown on the revised draft policy at Appendix C.

Increased number of priority bands

8. The current bands are A,B,C,D, with band A being the highest priority. Within A there are 3 groups prioritised ahead of others: A1 Permanent Decants; A2 Under Occupation; and A3 Management Transfer. Two thirds of applicants are in priority bands A & B. The proposal provides more differentiation by creating more bands – 14 discreet bands with high priority for those who have resided in Hillingdon for 10 years or more, continuously. It is proposed that each priority banding reason be two tiered with the higher of the two bands awarded to those who meet the additional priority (for most applicants a higher priority award will typically be for 10 or more years continuous residency).

Additional Priorities

9. There are currently four additional priority categories. Members of the Armed Forces, who continuously resided in the borough for 10 years prior to signing up, are currently awarded band A. There is no change proposed for this. The equivalent of band A (new Band 7) will continue to apply.

Revised Bands			
1	Decant with additional priority	8	Other emergency or severe housing need without additional priority
2	Decant without additional priority	9	Urgent need to move with additional priority
3	Under-Occupation with additional priority	10	Urgent need to move without additional priority
4	Under-Occupation without additional priority	11	Other identified need to move with additional priority
5	Management Transfer with additional priority	12	Other identified need to move without additional priority
6	Management Transfer without additional priority	13	Homeless without 10 years residency
7	Other emergency or severe housing need with additional priority	14	Those with savings or a property interest

10. The other three additional priorities currently work by providing 1 band enhancement i.e. D to C, C to B etc. Only 1 enhancement applies and mostly it is for 10 years residency. It is proposed that the other 2 additional priority categories are removed. These are 'Couples aged over 21 without children' and 'Working households working 24 hours or more per week'. The method of applying additional priority to the remaining 10-year additional priority category will be as shown above. The higher band of 2 bands will apply depending on housing need.

Priority Groups

11. Priority for the following groups will increase from current Band B to the equivalent of Band A (New bands 7 and 8).
- Vulnerable care experienced young people;
 - Moving on from social care supported, (including mental health and learning difficulties);
 - Vulnerable single move on from supported housing, based on recommendation of single homeless move on panel.

Overcrowding

12. The current policy allows those with a 4 bed need to bid for three bed properties. This will be extended to other bed sizes e.g. 3 bed need currently in 1 bed can bid for 2-bedroom sized properties.

Consultation Responses and Equality Impact Assessment

13. A Consultation Report and an Equality Impact Assessment (EIA) have been completed and are included at Appendices A & B. The consultation results are positive, and the EIA does not raise any concerns. The revised policy with details of the changes marked up is at Appendix C.

14. Some suggestions for additional changes were received as part of the consultation process, including allowing some flexibility with regard to verifications checks for those with rent arrears if they are under-occupiers seeking to downsize. This would mean that a variation from the usual requirement for ‘a repayment plan to have been agreed and adhered to for at least 6 months’ can be approved by the Corporate Director in consultation with the relevant Cabinet Member. The release of family sized accommodation is of benefit to the council in meeting housing needs and in some instances the build-up of rent arrears may be related to living in a property that is bigger than their housing need. This would be a minor amendment involving small numbers of people and has consequently been included in the revised policy.
15. Suggestions have also been made for some exceptions to qualifying criteria to be removed. These are:
- An existing exception to the qualification rule relating to ‘the need to have a demonstrable housing need to join the housing register’ to be removed. This exception relates to ‘people over 60 who would benefit from sheltered housing’;
 - An exemption from the qualifying requirement to have been ‘continuously living in the borough for at least 10 years’. The exception concerned is for ‘people over 60 who are currently resident in the borough and who would benefit from sheltered housing’;
16. These are potentially more significant changes and therefore need further consideration and if brought forward will need to be subject to a further consultation exercise and equalities impact assessment.

Policy Implementation

17. Subject to approval, implementation of the policy is proposed to be from 1st March 2025. A full implementation plan is being developed and will include:
- Communication plan for residents, and stakeholders including housing associations, voluntary sector partners and internal council colleagues;
 - Responding to enquiries from residents regarding the new policy;
 - Implementing required changes to IT systems and working procedures;
 - Re-banding of all existing cases;
 - Redefined staffing roles and responsibilities;
 - Staff briefings and training;
 - Monitoring and evaluation framework.

Financial Implications

18. Subject to agreement from Cabinet to the proposed changes to the Social Housing Allocation Policy, the implementation of the proposed changes will be within the existing staffing budgets of the Council. There will also be a need for some IT development work to update the information held on the Locata system. An estimated cost has been provided by Locata of between £5k and £10k, but this may vary depending on the detailed specification. This cost can be met within the existing budgets of the Council.

19. An Allocation policy can impact on the value obtained from the Social Housing stock through its influence on access and therefore the value obtained by the Housing Revenue Account. This in turn may impact on the general fund costs relating to temporary accommodation through changes to levels in demand.

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. An Equality Impact Assessment has been completed and is included at Appendix B.

The retention of the 10-year residency criteria is an example of Hillingdon's continuing commitment to put residents first.

Consultation & Engagement carried out (or required)

A comprehensive consultation process has been completed and is fully covered in the consultation report at Appendix A. The consultation ran for 11 weeks from 5th August 2024 to 20th October 2024. It included an online survey to which, 373 responses were received. Paper copies of the survey were also made available. The consultation was promoted to Hillingdon residents via social media channels and through posters placed in council buildings, libraries and in housing estates. Direct contacts were made with a wide range of stakeholders including housing associations, support providers, faith groups and voluntary sector partners, schools, colleges and local businesses. A series of focus groups were also held on 11th September, 10th October and 18th October.

The responses to the consultation have been positive with those agreeing or strongly agreeing with each of the proposals ranging from 62% to 75% and those disagreeing or strongly disagreeing ranging from 10% to 18%. The remainder were neutral.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance have reviewed this report and concur with the Financial Implications set out above, noting the recommendation to approve the revised Hillingdon Council Social Housing Policy.

Furthermore, it is noted that the implementation of the proposed changes will be contained within the Council's establishment budgets, which as at Month 5 monitoring position is presenting an underspend. The estimated cost for IT development work is between £5k and £10k, which may vary depending on the detailed specification, can be contained within the existing budgets, which as at Month 5 monitoring position, the Housing Revenue Account is containing to forecast a breakeven position, with the forecast rental yield being sufficient to contain operating costs and meet the planned Capital Programme Financing demands.

The impact on the General Fund relating to temporary accommodation through the changes in demand will be considered within future refreshes to the Council's budget strategy.

Legal

There is no legal impediment to the Council adopting the policy as proposed. However, the decision-maker must carefully consider the consultation responses and take into account the equalities impact assessment before making a decision.

BACKGROUND PAPERS

1. [Cabinet report and decision – July 2024](#)
2. [Allocation of accommodation: guidance for local authorities \(last updated June 2024\)](#)
3. [Minutes of the Residents' Services Select Committee – 24 September 2024](#)