

For publication

Review of Housing Allocations Policy (HC000)

Meeting:	Cabinet Council
Date:	23 October 2018 12 December 2018
Cabinet portfolio:	Cabinet Member for Homes and Customers
Report by:	Assistant Director – Housing

For publication

1.0 Purpose of report

- 1.1 To feedback the results of the consultation with current applicants and stakeholders regarding the proposed changes to the Council's Allocations Policy.
- 1.2 To seek approval to adopt the Home Options Policy, incorporating local differences for Chesterfield, following feedback from the consultation process.

2.0 Recommendations

- 2.1 That members note the feedback from consultation and approve implementation of the Home Options Policy, incorporating local differences for Chesterfield.

- 2.2 That Cabinet recommend to full council the adoption of the new Home Options Policy.
- 2.3 To rescind the Local Lettings Plan approved in June 2017.
- 2.4 That any minor operational amendments to the Home Options Policy be approved by the Cabinet member for Homes and Customers and the Assistant Director for Housing.

3.0 **Report details**

Background

- 3.1 A report was considered by Cabinet on 17 July 2018 which recommended changes to the Council's Allocations Policy.
- 3.2 It was agreed that a six-week consultation with Chesterfield Borough Council tenants, current applicants on the housing register and stakeholders would be undertaken. The consultation period ended on 24 September 2018.

Consultation

- 3.3 A consultation pack, which included a covering letter detailing background information, an information sheet summarising the key changes to the policy and a questionnaire to give feedback, was produced. The consultation pack is attached at **appendix A**. A full copy of the Home Options Policy is attached at **appendix B**.
- 3.4 The consultation pack was sent to:
 - all tenants and applicants, including an invitation to attend one of four consultation events for tenants and applicants
 - all members, including an invitation to attend one of two consultation events for members
 - managers within the Council
 - A range of stakeholders including:

- Action Housing and Support
- Chesterfield Citizens' Advice Bureau
- Chesterfield and North Derbyshire Credit Union
- Derbyshire County Council's Children and Young Adult Services, Adult Care Services, Youth Service, Health and Communities and Public Health
- Department for Work and Pensions
- Derbyshire Law Centre
- Derbyshire Probation Service
- Derbyshire Unemployed Workers' Centre
- Elm Project
- P3 support service
- Pathways
- Registered social landlords

3.5 The consultation pack was also published on the Council's website included a link to enable feedback to be given online and a link to the current and proposed allocation policies.

3.6 Information was also posted on the Council's and Housing's Facebook and Twitter pages including a link to the consultation information on the Council's website.

3.7 Information was displayed in the reception area at On the Move and consultation packs were also available.

Consultation Responses

3.8 The questionnaire asked respondents to indicate the type of impact they anticipated each change to the policy would have in general and whether they felt the changes would impact on them personally.

3.9 A total of 887 questionnaires were received in response to the consultation process giving a response rate of 9%. The questionnaire report which details response rates for the proposed changes is attached at **appendix C**.

- 3.10 Overall, 67% of respondents indicated that the proposed changes were positive with a further 22.3% being neutral. Only 9.5% indicated that the impact of the changes could be potentially negative.
- 3.11 Of particular note are the responses to the proposed changes to the medical priority, with 63.4% of respondents answering that they would be potentially positive and only 5.9% of respondents answering that the changes could be potentially negative. Some comments expressing concern about the Council contacting busy medical practitioners, however, applicants' needs will be assessed using a range of supporting evidence, face-to-face interviews or home visits. The Home Options Policy includes a user-friendly table detailing how different medical conditions impact on the daily life of applicants and how applicants' priority for housing on medical grounds will be awarded.
- 3.12 51.7% of the responses to the proposed local residency criteria indicated that the changes would be potentially positive. 12% felt that the changes could be potentially negative and the comments relating to this issue highlighted the need to provide information about how these applicants, and out of borough applicants, will be dealt with should the policy be approved.
- 3.13 The Home Options Policy limits applications to its Home Options partners' areas with preference given by each partner to applicants from their own area. To ensure a demand for difficult to let properties in Chesterfield remains, it is proposed to include a 'local difference' for Chesterfield to accept applications from beyond the partnership boundary.
- 3.14 This would make the list open to all prospective applicants. However, preference would be given to applicants who met the Chesterfield local residency requirement. Applicants who

do not meet the Chesterfield local residency requirement would only be considered for properties that did not receive bids from any applicants who met the Chesterfield local residency requirement.

- 3.15 In June 2018 a Local Lettings Plan was approved by Cabinet allowing applications to be received for hard to let properties from neighbouring authority areas of North East Derbyshire and Bolsover. If the Home Options policy is approved this Local Lettings Plan can be rescinded.
- 3.16 The proposed changes to the revision of the exclusions for unacceptable behaviour also received a high level of positive responses at 52.9%. The comments relating to this issue highlighted the need to promote awareness of the checks that are undertaken before an application is accepted on to the housing register.
- 3.17 The proposed changes with regard to not giving priority to children in flats received the lowest amount of positive responses at 28.7% of respondents. It also received the highest number of negative responses at 24.2%. Along with the comments from respondents, this indicates the need for Chesterfield to include a 'local difference' to award some priority to Chesterfield Borough Council tenants who reside in flats and have children living with them as their only and main home.
- 3.18 The proposed changes with regard to the on-line application received a positive response from 34.3% of respondents. 18.3% of respondents felt that the changes could be potentially negative. The online application is probably the biggest proposed change and comments regarding this change were anticipated. Positive comments were received along with comments concerning customers who may not have access to the internet.

3.19 In response to this concern we are putting in place a range of measures to ensure that all applicants wishing to join the housing register will be given as much support as possible

This includes:

- Offering assistance to apply online using computers at On the Move and at the customer service centre
- Advice and assistance over the telephone
- Providing access to computers at other council buildings (where possible)
- Producing easy to understand user guides to assist customers to use the online system
- Producing easy to understand user guides to help officers in stakeholder organisations to assist customers to use the online system
- Promoting places where the internet can be accessed for free, for example local libraries

3.20 Home Options partners have advised that based upon their experience of implementing this online system their customers had similar reservations initially but, when the system was implemented, the assistance provided meant that customers were able to easily access the system with only a handful of paper applications being required.

3.21 As Chesterfield is a full Universal Credit area, more people are moving on to benefits which are claimed and managed online. It is therefore felt that the proposals are in line with modern processes that a high proportion of applicants are familiar with and the additional support listed in 3.16 above will ensure that all applicants are supported accordingly.

3.22 Under the current policy there is currently no equity limit in place and owner occupiers are able to join the housing register regardless of any assets they may have which could be used to meet their housing need. The proposed changes with regard to equity and owner occupiers received a positive response from 33.5% and 38% of respondents respectively.

Details of the calculation used by the Home Options Partnership to assess equity were not included in the consultation pack and some comments were therefore received.

- 3.23 The Home Options calculation uses the UK House Price Index for Chesterfield at June 2018. 50% of the average house price for all property types in Chesterfield would be the figure used. Using the Index, the average house price for all property types in Chesterfield at June 2018 was £155,948. 50% of that amount would be £77,974 and would be Chesterfield's equity limit if the policy was approved. Chesterfield's would be the lowest equity limit in the partnership. This will be reviewed annually to ensure that any changes in this amount are taken into account.

4.0 **Impact**

- 4.1 It is considered that the introduction of the Home Options Policy will enable the Council's Housing Options team to improve how it allocates council properties to those in housing need, reduce the number of empty properties and maximise rental income to the Council's Housing Revenue Account.
- 4.2 By improving the way in which the Council assesses applications for housing and allocates its housing stock, it is expected that more sustainable tenancies will be created by properly assessing individual circumstances and providing the correct information and advice at the outset.

5.0 **Implementation**

- 5.1 Should Cabinet recommend that the Home Options Policy be considered by full council this will be taken to the meeting on 12 December 2018.

- 5.2 This enables additional consultation to be completed by the remainder of the Home Options Partnership with the final version of the policy being brought to full council in December.
- 5.3 During this time officers will be taking the following steps to assist in the implementation of the Home Options Policy and the new Locata IT system:
- Design updates to the specification of Locata to deliver the new policy
 - Testing the updated system to identify any compatibility issues
 - Feedback and sign off of the final system
 - Re-registration of all existing applicants on the council's housing register (completed over 3-4 weeks to ensure accuracy of the process)
 - Staff training on verification, advertising and shortlisting
- 5.4 It is therefore suggested that the Home Options Policy be approved and implemented by mid-March 2019 alongside the new Locata system.
- 5.5 Throughout the implementation process customers will not suffer any detriment to current service provision as applicants on the existing choice based lettings system will continue to be able to bid on advertised properties.
- 6.0 **Human Resource Implications**
- 6.1 There are no human resource implications associated with the implementation of the new policy and IT system.
- 7.0 **Financial Implications**
- 7.1 The sum of £80,000 was previously identified and allocated for the replacement of the existing Choice Based Lettings IT

system. The Locata system has been acquired with first year costs including set up being circa £40,000. The ongoing annual costs are circa £20,000.

7.2 It is expected that the implementation of the new paperless system there will be an ongoing saving to the Housing Revenue Account in printing, copying and storing paper applications.

8.0 **Legal Implications**

8.1 The proposed policy will ensure that the allocation of council accommodation is carried out in accordance within all current legislation. It will also create a clearer, more transparent process which will reduce the potential for costly legal challenges.

9.0 **Information assurance and data protection**

9.1 The proposed policy and IT system is fully compliant with all legislative requirements and the Council's Information Assurance Officer is involved in the consultation and implementation process. This is ongoing but is expected to be completed before full council meeting in December 2018.

9.2 A Data Protection Impact Assessment is currently being conducted for the proposed Locata ICT solution. Where changes in the allocations policy alters the processing of personal data – the Locata data protection impact assessment will be re-assessed.

10.0 **Consultation and community engagement**

10.1 A full consultation process has been undertaken as detailed in paragraphs 3.3 to 3.7 above

11.0 **Equality Impact Assessment**

11.1 A full EIA is attached at **Appendix D**.

12.0 Risk Assessment

Description of the Risk	Impact	Likelihood	Mitigating Action	Impact	Likelihood
Adverse publicity	High	Medium	<ul style="list-style-type: none"> • Communication and consultation strategy • Meetings with specific interest groups 	Medium	Medium
Loss of rental income	High	Medium	<ul style="list-style-type: none"> • Develop plans for alternative use of void properties • Partnership working to explore other markets and solutions • Medium to long term strategy to re-configure stock on estates to meet current and emerging demands • Re-model Business Plan 	Medium	Medium
Increased number of void properties on estates	High	Medium	<ul style="list-style-type: none"> • Develop plans for alternative use of void properties • Partnership working to explore 	Medium	Medium

			<p>other markets and solutions</p> <ul style="list-style-type: none"> • Medium to long term strategy to re-configure stock on estates to meet current and emerging demands 		
Legal challenges	High	Medium	<ul style="list-style-type: none"> • Specialist Legal advice obtained and followed in drafting proposals • Communication and consultation strategy • Meetings with specific interest groups 	Medium	Medium

13.0 Recommendations

13.1 That members note the feedback from consultation and approve implementation of the Home Options Policy, incorporating local differences for Chesterfield.

13.2 That Cabinet recommend to full council the adoption of the new Home Options Policy.

13.3 To rescind the Local Lettings Plan approved in June 2017.

13.4 That any minor operational amendments to the Home Options Policy be approved by the Cabinet member for Homes and Customers and the Assistant Director for Housing.

14.0 Reasons for recommendations

14.1 To enable the council through the Housing Options Team to be in the best possible position to allocate council housing stock to applicants most in need and to provide a customer focussed and user friendly service.

Decision information

Key decision number	823
Wards affected	ALL
Links to Council Plan priorities	To improve the quality of life for local people' 'To increase the supply and quality of housing in Chesterfield Borough to meet current and future needs'

Document information

Report author	Contact number/email
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Background documents	
These are unpublished works which have been relied on to a material extent when the report was prepared.	
<i>This must be made available to the public for up to 4 years.</i>	
Appendices to the report	
Appendix A	Consultation pack – covering letter, questionnaire, information sheet/summary of changes
Appendix B	Home Options Policy
Appendix C	Consultation questionnaire report
Appendix D	Full EIA