

SUBJECT:	ALLOCATIONS POLICY
DIRECTORATE:	HOUSING AND INVESTMENT
REPORT AUTHOR:	YVONNE FOX – ASSISTANT DIRECTOR – HOUSING MANAGEMENT

1. Purpose of Report

- 1.1 To seek member approval to implement a new Allocations Policy.
- 1.2 The proposed policy will be implemented following completion and testing of changes to the Abris IT system with an anticipated date of Monday 1st June 2020.

2. Executive Summary

- 2.1 Following an interim review of the Allocations Policy in 2017 in preparation for the introduction of the Homelessness Reduction Act 2018, a full review of the policy was carried out as part of the review of the Allocations and Homelessness teams. In addition, consideration has been given to advice and guidance provided by the Ministry of Housing, Communities and Local Government (MHCLG) Specialist Homelessness Advisor; the Codes of Guidance; Case Law and the provisions of the Localism Act 2011.
- 2.2 The proposed policy will ensure the City will operate a policy that fully complies with legislative requirements whilst ensuring that we make best use of all social and affordable housing in the City. We will ensure that those in most need are secured accommodation swiftly whilst also recognising that people who live and work in the City should be prioritised for housing.

3. Background

3.1 Housing Allocations Policy Review 2019

Local Housing Authorities must have regard to Statutory Guidance when exercising their functions under Part 6 of the Housing Act 1996.

In 2012 and 2013 Statutory Guidance was issued and Local Authorities were asked to review their allocation policies and revise them, where appropriate, in line with the guidance.

- 3.2 The 2013 guidance, providing social housing for local people enabled Local Housing Authorities to make full use of the provisions of the Localism Act 2011. The Act gave back to local authorities, the freedom to better manage their waiting lists as well as providing greater flexibility to tackle homelessness. Local

authorities can now decide who qualifies for social housing in their area to better meet the needs of local residents and local communities.

3.3

Qualification for Social Housing

Housing authorities can only allocate accommodation to people who are defined as 'qualifying persons', and the Act gives LA's authority to define who is a qualifying person.

3.4

The Statutory Guidance advises local authorities to ensure that they prioritise applicants who can demonstrate a close association with their local area. This is to ensure that sufficient affordable housing is available for those amongst the local population on low incomes who may otherwise be not able to find a home on the open market.

3.5

Housing authorities are therefore strongly advised to adopt a residency qualification. The Secretary of State advised that a reasonable period of residency would normally be two years.

Applicants with a strong family connection or who work in the district may be awarded exception.

4. Proposed Policy

4.1 Allocations Policy 2019 Proposed Changes

As recommended in the Statutory Guidance and as advised by officers from the MHCLG, we have considered the need to introduce a residency qualification to the waiting list.

4.2 Prioritising applicants with a connection to Lincoln is a key driver for the change as is the need to reduce homelessness and rough sleeping in the City. The majority of local housing authorities have a residency qualification of between 2 and 5 years and areas with open waiting lists have experienced increased homelessness and rough sleeping. Stopping the flow of rough sleepers on to the streets of Lincoln is a priority and we are advised that by prioritising local people for housing, the flow should reduce. Anyone who does come to Lincoln and sleeps out will of course access all the services available here in the City and we will look to either reconnect them to the area where they have a connection to or to give housing advice and assistance to access private rented accommodation or accommodation provided by other agencies such as the YMCA.

4.3 At present, we operate a joint policy with North Kesteven District Council (NKDC). In the current policy there are some differences relating to property types and priority but the qualification criteria for both authorities is the same. City of Lincoln Council (CoLC) and NKDC have very different stock profiles and are geographically dissimilar. As a University City we experience net migration in to the City from surrounding areas and high demand for housing whereas NKDC have low demand for houses and bungalows in rural villages and high demand for single person accommodation. We have discussed with officers at NKDC the need for CoLC to introduce a residency qualification to ensure that local people

are prioritised for housing but due to the low demand for housing in NKDC they feel unable to introduce the same in their area.

- 4.4 Therefore, we are proposing that CoLC and NKDC continue to work in partnership as Lincs Homefinder; that we continue to share the same IT system, have the same application form, assess applicants in the same way and have four bands with the priority band A and Bands B & C assessed the same way.

The proposed changes to CoLC Policy in full are:

- Introduction of a residency qualification of 24 months for CoLC applicants
- Creation of a Transfer Band
- Allowing households threatened with homelessness who accept an offer of private rented accommodation to keep their priority on the waiting list for Council accommodation
- Allow couples to be considered for 2 bed flats if there is no demand from a household with a 2 bed need (subject to affordability)
- Households with one child under the age of 12 months or who are pregnant may be offered a 1 bed property (subject to demand)
- Households leaving named hostels within the City will be assessed in line with Homelessness Statutory Guidance

- 4.5 The changes to procedures include:

- Additional checks at application stage to ensure applicants are able to afford a tenancy and to signpost to other agencies as required
- An application will not be made live until an applicant provides all proofs and if these are not returned within 28 days the application will be cancelled
- Clarification regarding preference offered to forces and ex-forces personnel (not subject to residency criteria as per statutory guidance)

- 4.6 Any applicant currently registered who does not meet the residency qualification will have their application reviewed and provided with advice and assistance on all housing options available.

- 4.7 The Council is required to consult with RSL partners on proposed changes to the Housing Allocations Policy. Informal consultation with supported housing providers in the City commence in 2018 and all partners agreed with the proposed changes.

- 4.8 Formal consultation commenced on the 24th January 2020 until the 26th February 2020. Several anonymous comments were received and these are included at Appendix 2 with a response to each comment or question included. The comments received were primarily relating to the introduction of the residency qualification and the change of banding for persons ready to leave supported accommodation.

- 4.9 The Tenants Panel have been consulted on the proposed policy and are in agreement with the proposed changes.

Therefore, having fully considered the comments received, the proposed policy would not need amending in light of the consultation.

5. Strategic Priorities

5.1 Let's reduce inequality

5.2 The successful implementation of the Council's Allocations Policy is key to reducing inequality amongst vulnerable groups.

Key needs met include:

- Prevention and relief of homelessness
- Prevention and relief of street homelessness
- Households adversely affected by welfare reform
- Households whose homes are not suitable for their medical needs or disability
- Move-on from hospitals
- Move-on from Supported housing

6. Organisational Impacts

6.1 Finance (including whole life costs where applicable) - There are associated financial implications of approximately £18,000 to make amendments to the Abritas system. These costs were identified as part of the initial installation of the new system and can be met from existing budget.

6.2 Legal Implications including Procurement Rules - There are no direct legal implications arising from this report at this time.

6.3 Equality, Diversity and Human Rights

6.4 The Public Sector Equality Duty means that the Council must consider all individuals when carrying out their day-to-day work, in shaping policy, delivering services and in relation to their own employees.

6.5 It requires that public bodies have due regard to the need to:

- Eliminate discrimination
- Advance equality of opportunity
- Foster good relations between different people when carrying out their activities

6.6 The Policy will ensure that anyone will be safeguarded against exposure to the different elements contained in the policy. Those who exhibit a protected characteristic would automatically be covered by this policy, and therefore there is no negative impact on anyone displaying a protected characteristic.

6.7 Human Resources - There are no direct HR implications arising from this report at this time.

7. Risk Implications

7.1 There are no risks identified with implementing this policy.

8. Recommendation

8.1 Members are asked to approve the Allocations Policy, with a view to the Policy being implemented on the 1st June 2020.

Is this a key decision? Yes

Do the exempt information categories apply? No

Does Rule 15 of the Scrutiny Procedure Rules (call-in and urgency) apply? No

How many appendices does the report contain? 2

List of Background Papers: None

Lead Officer: Yvonne Fox – Assistant Director of Housing
Telephone (01522) 873716