

Analysis of:

ALLOCATION POLICY:

CONSULTATION ANALYSIS

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Disclaimer: The views and comments contained in this report are the results of the consultation process. They are shown here for completeness, but do not necessarily represent the views of the Council.

INTRODUCTION

Initial consultation was carried out to gather the opinions of providers and other key stakeholders on the range of issues to inform the draft Allocation Policy. This included:

- Housing Joint Commissioning Partnership workshop – 7th March 2012.
- Housing Association Liaison Group – 14th March 2012.
- Six Town Housing Board – 30th May 2012.
- Elected Members’ Training evening – 3rd July 2012.
- 4 Stakeholder groups:
 - Elizabethan Suite – 23rd July 2012.
 - Mosses Centre – 30th July 2012.
 - Longfield Suite, Prestwich – 10th August 2012.
 - Radcliffe Civic Suite – 13th August 2012.
 - A thorough examination of the policy by legal officers, including Counsel opinion.

In total, up to 100 participants were involved in the earlier discussions detailed above.

A more extensive consultation on the draft Allocation Policy was undertaken following Cabinet approval in October, using a variety of methods to maximise opportunities for response.

CONSULTATION WORKSHOPS

- Tenants’ and Housing Waiting List Applicants’ Workshop:
 - Elizabethan Suite – 16th November 2012
- Stakeholder Workshops:
 - Elizabethan Suite – 29th October 2012
 - Radcliffe Civic Suite – 31st October 2012
 - Longfield Suite, Prestwich – 7th November 2012
 - Mosses Centre – 12th November 2012
 - Ramsbottom Civic Suite – 22nd November 2012
 - Jinnah Centre – 27th November 2012
 - Elizabethan Suite – 28th November 2012
- Staff Workshops:
 - Six Town Housing Away Day- 4th September 2012
 - Elizabethan Suite – 20th November 2012
 - Elizabethan Suite – 27th November 2012
 - Disabled Employees Group – 28th November 2012

75 participants attended these events, the majority being tenants or people on the housing waiting list.

Interactive voting buttons were used at some of the consultation events with stakeholders, tenants and staff, subject to sufficient numbers attending, to obtain qualitative data on a number of specific issues to do with the draft policy. The interactive sessions enabled the results of the voting to be displayed instantaneously for attendees to view and then generate further discussion within the workshops.

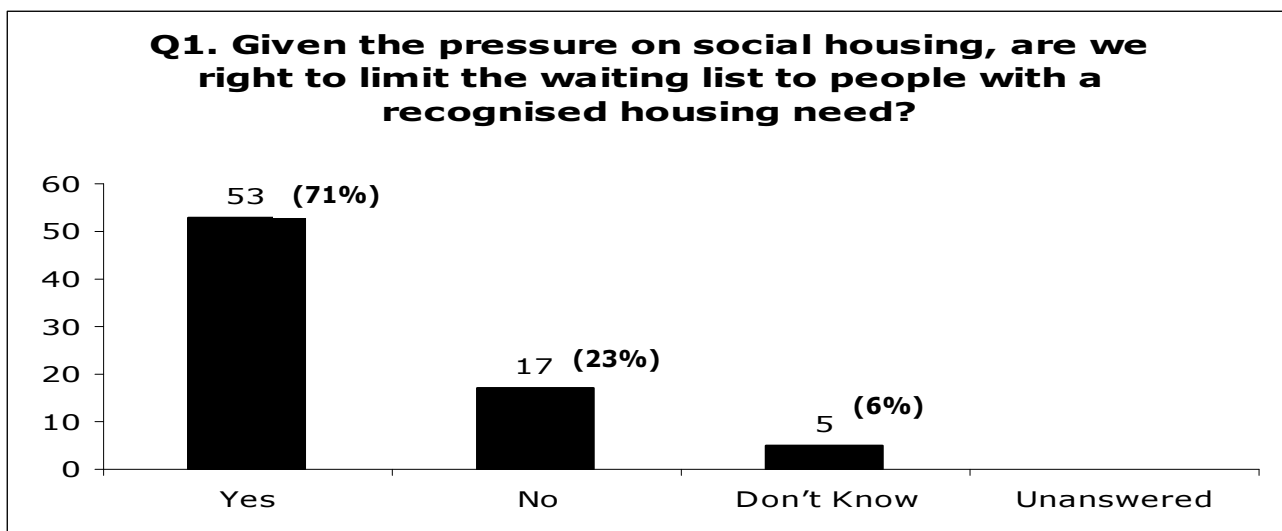
The interactive sessions took place at the following events:

- *Stakeholder:* Longfield Suite, Prestwich, Wednesday 7th November, 2-5pm
- *Tenant:* Elizabethan Suite, Bury, Friday 16th November, 9.30am – 12.30pm
- *Staff:* Elizabethan Suite, Bury, Tuesday 20th and 27th November, 9.30am – 12.30pm

The results of these have been combined. A number of questions were asked relating to the proposed context of the draft Policy, the results of which are analysed in more detail below.

Analysis of the Interactive sessions

Qualifying for the waiting list



The majority of participants (53) agreed that the waiting list should be for those people with a recognised housing need. However, 17 disagreed and felt the waiting list should be open to all and 5 did not know. This pattern of opinion was reflected in each of the workshops, demonstrating a consistent view of stakeholders, tenants/applicants and staff.

Comments made in the workshop sessions are detailed below:

Discussion on whether someone should review tenants individually and assess what housing needs they have.
Limit waiting list as accommodation is in such short supply.
Social housing should be available to all people within the Borough.
Not enough monitoring with new tenants, circumstances change throughout time, but residents are not then monitored.
The list should be limited to speed up the process of accommodating tenants.
People who live within the Borough have a right to apply for social housing.
There are currently too many people on the waiting list; restrictions need to be put in place to reduce this.
Ensure that properties are marketed more appropriately.
Is band 5 necessary as this is for those with no housing need?
Some properties on CBL are going to those in band 6.
Waiting list should be open to all.
Circumstances do change and may start with no need but then require a greater priority.
Some people may not be ready to move and are waiting for a specific area/street.
As long as people are given the advice and told they have no priority then it's their choice to stay on the list.
Some people sit and wait for a particular type of property on a particular estate.
Need clarity over where people can chose to be re-housed to.
Those in band 5 if successful are only because others are not bidding.
Cost more for those that appeal for being refused from going onto the waiting list.
People are put in band 5/6 before their full assessment of need is taken place.
Set a time limit for those waiting in band 5/6.
Band 5 could include those that do not fit into the other bands but do have a housing need

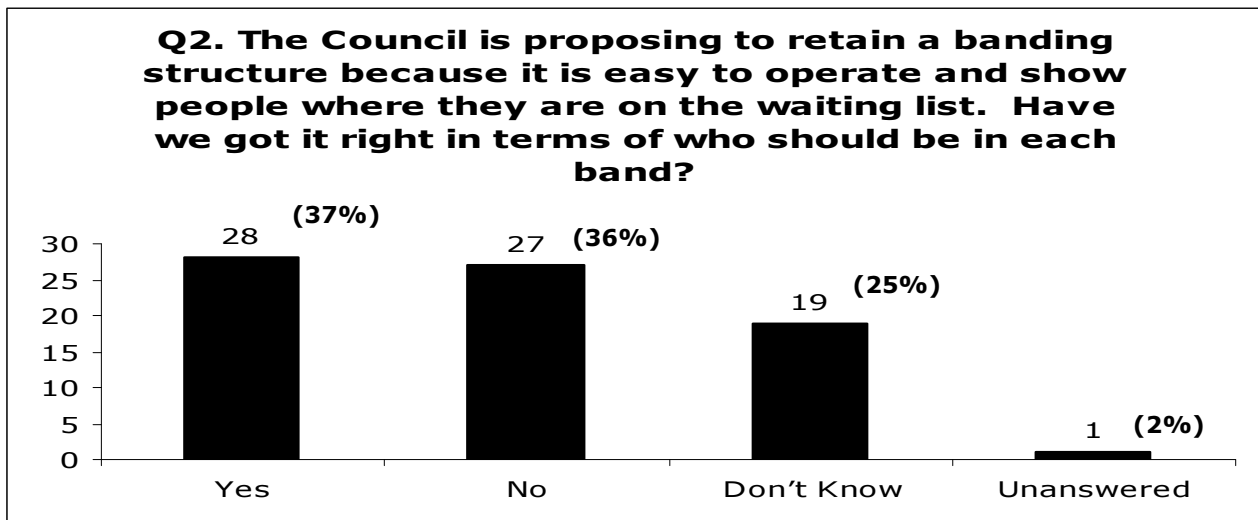
Summary:

- Over 70% of participants felt that the waiting list should be open to those people with a recognised housing need only.
- Workshop discussions acknowledged the shortage of social housing, recognised the size of the waiting list and agreed that restrictions need to be put in place to reduce it.
- Some within the workshop discussions felt the list should be open to all due to the costs associated with the appeals process if people are refused from the list.
- Also, there are occasions where people currently in band 5 or 6 are successful for a property due to others in higher bands not bidding on the property. This can lead to accusations of 'queue jumping' and occasionally the inappropriate mix of tenants on an estate. Conversely the removal of such applications from the waiting list could see some properties remaining vacant for longer.

Issue for consideration:

- There are clear merits in having an efficient and streamlined waiting list only of people in housing need. Having a clearer and more accurate picture of the housing needs in the borough will help to focus new housing strategies.
- If accurate assessments of housing need are made, those in greatest need should always be rehoused first, irrespective of the overall size of the list and whether or not it contains those with no housing need.
- Restricting access to the waiting list to only those in housing need could also impact on the Council's and Six Town Housing's ability to let some properties. In the year 2011/12, 80 applicants were rehoused from the lowest / no housing need band. These applicants were found to be rehoused in sheltered and difficult to let, properties which may otherwise have remained void for longer periods of time. We need to ensure that this does not happen.

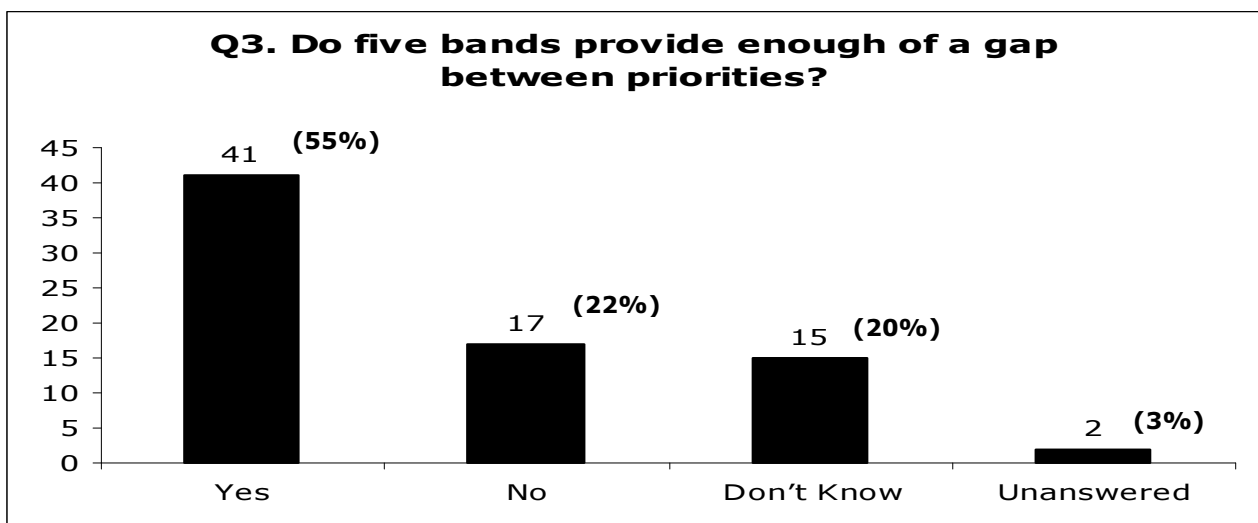
Giving priority to applicants



28 participants agreed with the proposed banding structure and felt it was right, whereas 27 participants disagreed and felt the new banding structure proposed was not right. The views in favour of the proposed banding structure mostly came from the staff focus group, with most tenants disagreeing with the proposals, and stakeholders being roughly evenly split.

Comments made in the workshop sessions are detailed below:

Priority for people who need adapted accommodation.
People that do not have need for a house should not be applicable.
Questions were raised regarding what would happen when circumstances change.
Tenants who want to downsize should be provided priority.
Proposed banding structure depends on individual's situation.
Issues arose in terms of supporting people to move as tenants shouldn't feel forced to move accommodation.
Encouraging people to downsize is important but shouldn't be a necessity.
Questioned the need for Band 5 and whether this band is needed.
People should not be allowed to wait on the list for too long.
Band 5 is not needed.
Only people with a housing need should be on the waiting list.
Discussed that a family should be provided with a higher band/ bigger accommodation if children are sharing a room that are of opposite sex. Cases need to be reviewed separately as tenants have different circumstances.
Economic contribution should not result in that tenant being rewarded with a higher band. Only priority cases such as tenants fleeing domestic violence or homelessness should receive a higher band and offered a property via direct lets.
Application structure needs to be changed.
Statutory instruction from Central Government to include armed forces with no local connection in band 1.
Looking at management transfers to be direct lets rather than CBL. Procedures need to be more consistent at STH re how officers deal with management transfers.
Restricting people with children of a certain age to upper floor flats from bidding on these types of properties as they automatically have a priority for re-housing once they have moved in.
Band 5 – what's the point
Positive that homeless people have obviously been considered within the policy and barriers addressed- e.g. banding preference, those moving from supported accommodation



The majority of participants (41) felt there was enough of a gap between priorities in terms of the new banding structure, 17 disagreed, 15 did not express an opinion and 2 did not answer the question. The majority of participants that felt that there was enough of a gap attended the stakeholder and staff workshops. The views of tenants/applicants were split.

Comments made in the workshop sessions are detailed below:

Application structure needs to be changed.
The banding needs to be more specific.
Assessment process is not adequate.
Tenants should be assessed and be provided with a reason as to why they are allocated a certain band.
Agreed that urgent cases such as tenants who are homeless should be placed in band 1
Tenants need to be assessed on a case by case basis and then be allocated a band.
Other groups have suggested band 5 be removed to stop those with no housing need from getting a tenancy. The properties should be for those in housing need only.
More work on the ready to move process. People do not need to move on after 2 years if they are not ready and the tenancy will fail. Full assessment needs to take place to determine whether these people are ready to move.

Summary:

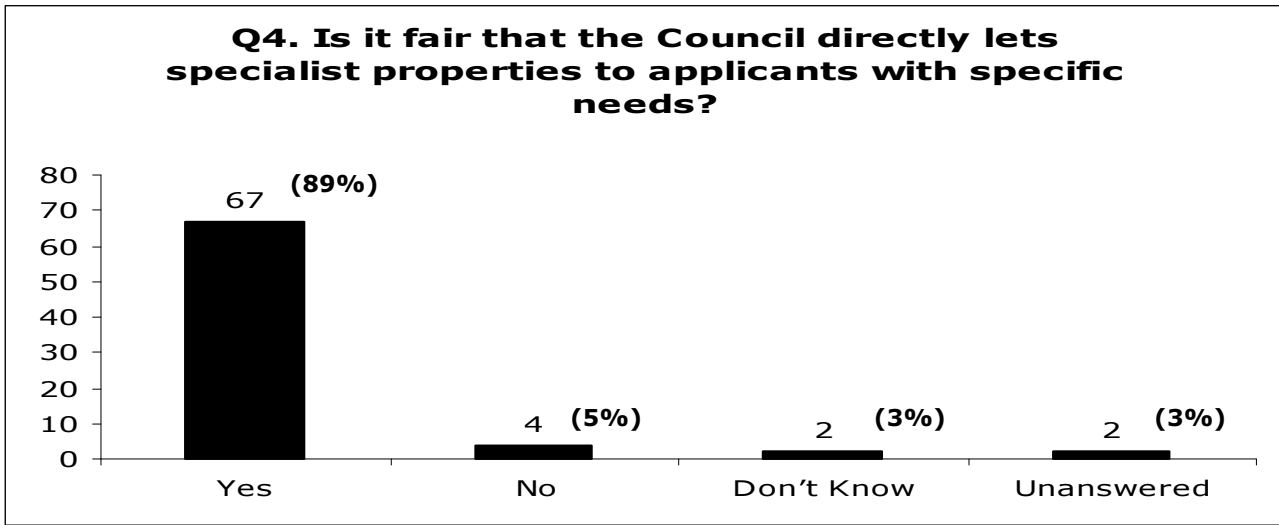
- Opinion on the new banding structure was split although a majority felt that the five bands provided enough of a gap between priorities.
- Many who felt the proposed banding structure was not right argued that only those in housing need should receive a banding.
- Workshop discussions included the assessment and application process and the need to assess tenants on a case by case basis to determine priority.
- In addition, workshop discussions included the removal of band 5 and more work needed with regards to the move on process from supported accommodation.

Issues for consideration:

- While there was some disagreement with the banding proposals and the gap between bands, the workshops did not provide on how these should be amended. Most comments related to the process for allocating priority, applying for housing and who was actually allocated a property. These issues will be considered as part of the development of new procedures as and when the new policy is adopted.

Similar comments were also made as to whether or not band 5 be removed. As noted earlier, there are considerations both for and against the use of this band.

Choice and control



The majority of participants (67) felt it was fair that the Council should directly let specialist properties to applicants with specific needs. 4 disagree, 2 did not know and 2 did not answer the question. These views were reflected across all workshops.

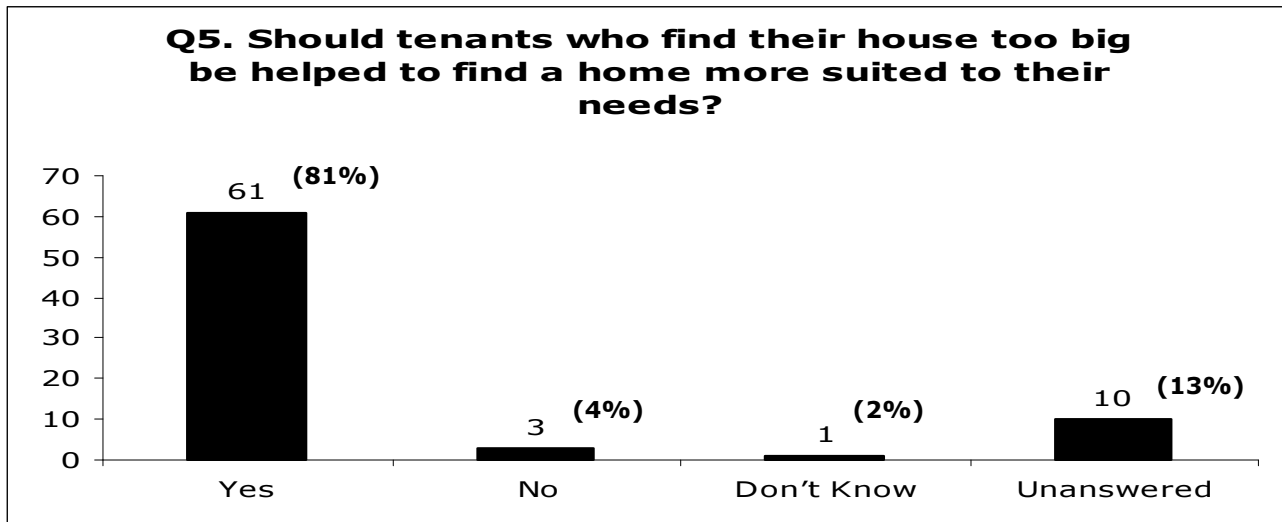
Comments made in the workshop sessions are detailed below:

Direct lets should only be offered to those with specific housing needs.
Yes, direct lets should only be used for tenants with a high priority.
Only adapted properties or sheltered to be offered as direct letting.
Tenants should be appointed properties that are in keeping with their housing needs instead of offering adapted properties to tenants who do not require this.
Direct lets should be exclusive for older people or tenants who need adapted properties.
Tenants should be reviewed on their housing needs and match this to a property.
Direct lets should be exclusive for older people or tenants who need adapted properties.
Query raised about status of application if direct let offer made and refused.
We need to consider non-stat homeless and refusals of direct lets on impact on status of application. Group concerned over '3-strikes and your out' rule being applied universally.
Tenants who are priority cases should also be referred to direct lets.
Percentage should be retained for consistency and quick availability
Need to be clear on what criteria would meet which categories for direct lets.
Improve matching of properties but still need to address issue of area and support.

Issues for consideration:

- There was support of the proposal to directly let specialised properties to those with specific needs. However, clarity was requested on the process for applicants to refuse offers of these properties and how this would impact on their status on the waiting list.

- If waiting list status is affected by a refusal of an offer, it may be necessary to expand the degree of choice on where people can be rehoused. Currently, this is based on a north / south split of the borough, but considering the nature of the borough, the council will explore expanding this to the six townships.



The majority of participants (61) felt that tenants should be helped to find more suitable accommodation if the property is too big, 3 disagreed with this statement, 1 did not know and 10 did not answer the question. These views were reflected across all workshops.

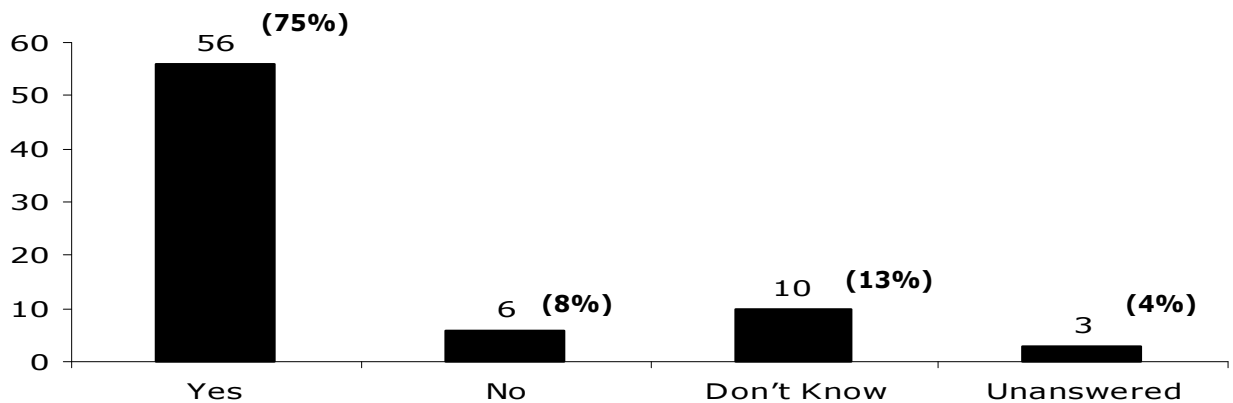
Comments made in the workshop sessions are detailed below:

Incentives to help tenants downsize could be provided.
Tenants will be willing to downsize if the accommodation provided is the same standard as their previous property.
Tenants should be given incentives to move. The Council needs to ensure that they are supporting tenants in terms of providing new facilities, decorating the accommodation etc.
To encourage tenants to downsize, incentives need to be offered such as helping with removal costs.
If a tenant is provided with the positives on downsizing then they are more likely to do so, however support should be offered.
Incentives should be provided.
Support should be given for tenants who are downsizing.
Downsizing in bands 1, 2 and 3 depending on property size and location. Monetary incentive for those properties in popular areas or those 4 bed properties that are in need.
Move on process needs to be tighter and the form needs to be addressed in partnership with STH.
Tenants should be provided with information regarding properties that suit their needs.
Bands should include downsizing.

Issues for consideration:

- There was support for this proposal, particularly with regard to the impact of Welfare Reform.
- However, there was a consistent view that tenants should not be forced to downsize if they did not want to. This is in line with approved Strategic Tenancy Policy.
- Comments were also made around incentives for downsizing. These were suggested as help with the costs of the move or demonstrating the savings that could be made from running a smaller property. These issues will be considered as part of the implementation of the policy although enabling downsizing alone will be to the financial benefit of the tenant.

Q6. Are we right to retain choice based lettings as the means of allocating most council housing?



The majority of participants (56) felt the Council were right to retain Choice Based Lettings (CBL) as the means of allocating most council housing. However, 6 stakeholders did not feel CBL was the right mechanism to use, 10 did not know and 3 did not answer the question. These views were consistent across all three workshops.

Comments made in the workshop sessions are detailed below:

There are a lot of tenants that bid for all properties available to ensure they can secure a property. However, tenants have placed bids and then change their mind. This results in a high percentage of failure rates, comments that choice based lettings does not work as system.

Some people wait for a particular type of property and so these applicants could be on the waiting list for a number of years, tenants should be made more aware of the properties offered and a time limit should be introduced.

Tenants need to be made more aware of how to bid on the choice base letting system and more awareness is needed.

Choice base lettings is a good system and enables tenants to view what properties are available.

Should look to limit bids made each week and number of offers made. But should apply to all lettings.

Need to educate customers into the way the system works.

Only adapted properties to tenants in need of adaptations should be selected via direct lets.

Summary:

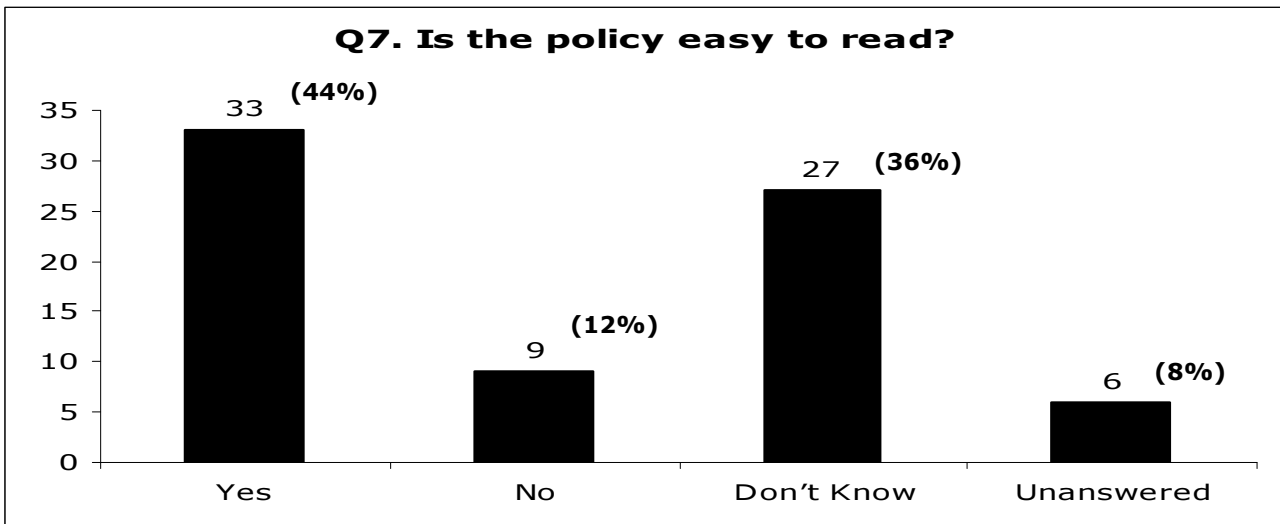
- A large majority of participants expressing an opinion agreed that the Council are right to retain Choice Based Lettings as the means of allocating most council housing. They also felt it was fair that the Council should directly let specialist properties to applicants with specific needs and that tenants should be helped to find more suitable accommodation if the property is too big.
- Issues regarding applicants waiting on the list for years for a particular property on a particular estate were discussed. It was felt a time limit should be enforced to reduce the number of people on the waiting list.
- In addition, participants felt the Choice Based Lettings system needed to be improved to restrict tenants placing multiple bids on properties that they are not interested in, which results in a high percentage of failures.
- Workshop discussions included looking at incentives to encourage people to downsize and also to ensure all adapted properties are allocated to those who need them in the future.
- In addition, workshop discussions felt more work was required on what should happen when direct lets are refused.

Issues for consideration:

- Achieving an appropriate balance between Choice Based Lettings and direct lets.
- Limiting the number of bids a tenant can submit.
- Incentives to encourage downsizing.
- Limiting the number of suitable offers made to applicants.

Format of the policy

The majority of participants (33) agreed that the policy was easy to read. However 27 participants said they did not know, which was possibly due to these people not reading the document.



Comments made in the workshop sessions are detailed below:

The policy is easy to read.

Need leaflets / docs in pictorial format so easier to understand for people with learning disabilities.

Summary:

- The majority of participants agreed that the policy was easy to read, which was also mirrored within the workshop sessions.
- Summary documents/leaflets may help to raise awareness of the policy and its provisions..

QUESTIONNAIRES

A questionnaire was published on Bury Council's website for all residents, stakeholders, elected members and housing associations to complete. In addition, questionnaires were made available at all seventeen libraries across the Borough, Six Town Housing reception, the Town Hall in Bury, Whittaker Street in Radcliffe and Adult Care's Connect and Direct at Textile Hall in Bury.

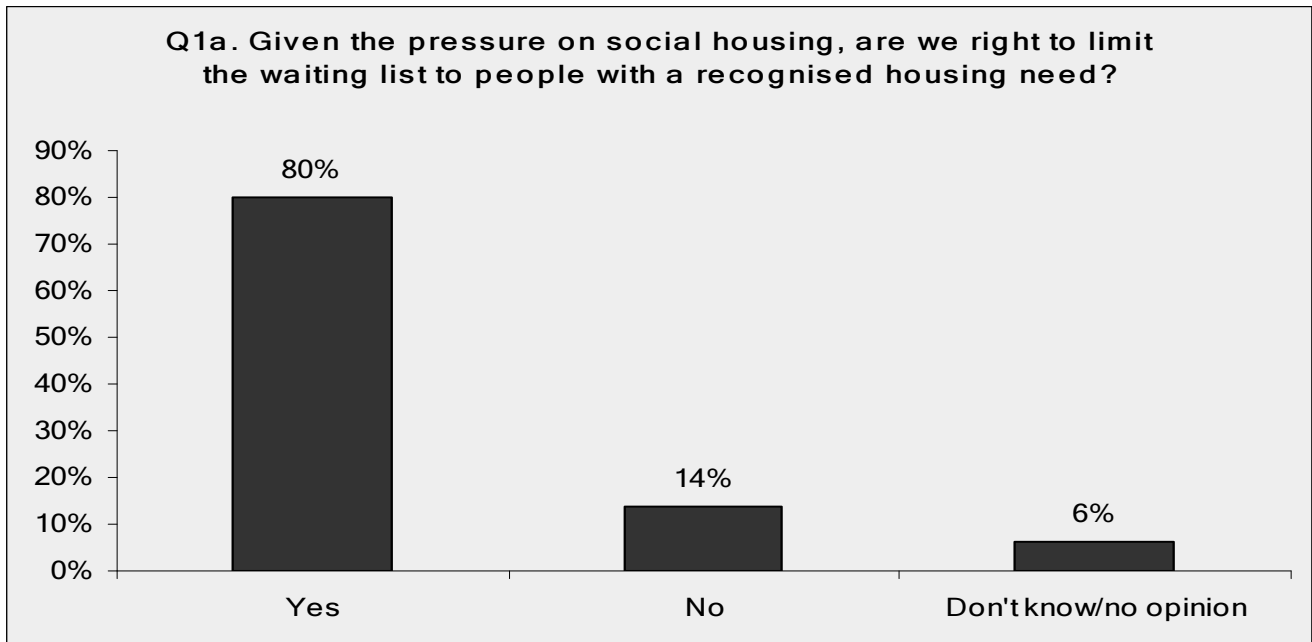
The overall objective of the survey was to gather views on the Council's draft Allocation Policy.

The survey was made available from 23rd October and the consultation period ended on the 30th November. During this time **68** people completed the on-line survey in relation to the draft Allocation Policy.

Questions were asked in relation to the proposal to restrict the waiting list to those in housing need only, the new banding structure, the suggestion of direct lets for specific properties types, and the future of choice based lettings. The results of the survey are detailed below:

Analysis of the Questionnaires

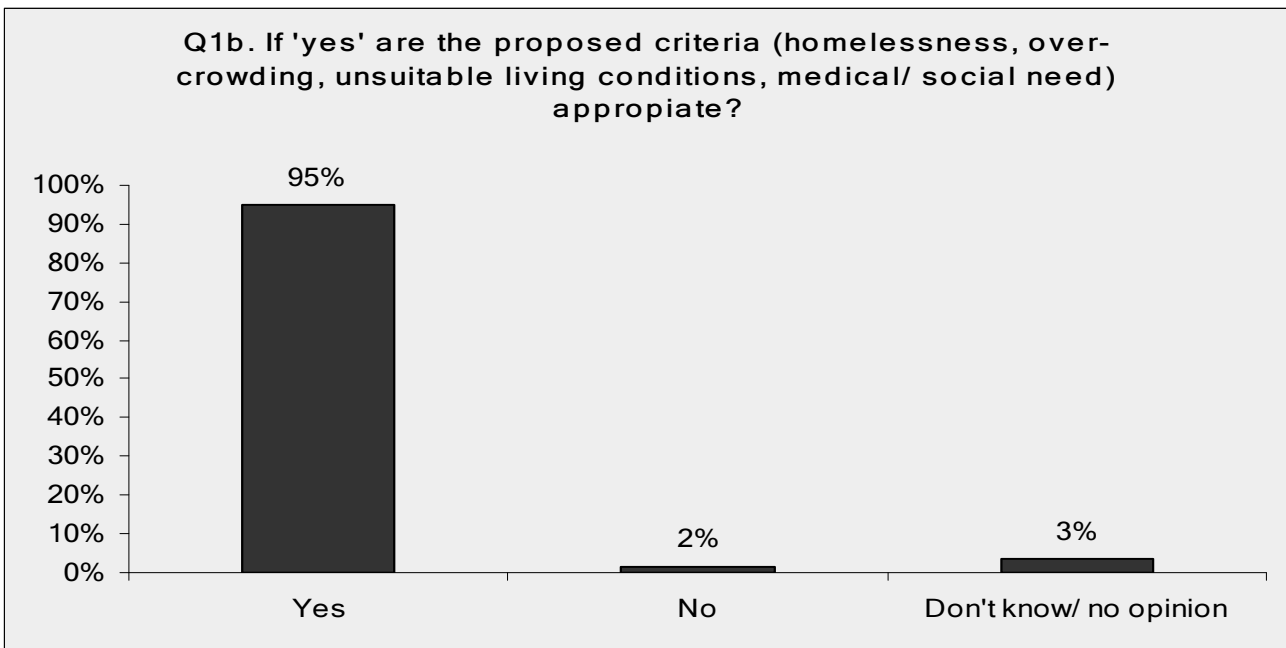
Qualifying for the waiting list



The majority of the respondents (80%) agreed that the waiting list should be limited to those people with a recognised housing need only. 14% disagreed and felt that the list should not be limited and 6% did not know or have an opinion.

The table below details the comments in relation to this question.

I believe that social housing should be open to all, and given the pressure on social landlords to find residents to fill voids, limiting people on the waiting list may be detrimental to our allocations timescale.
Creating mixed sustainable communities will be better achieved by accepting a wider customer base, looking to reduce the stigmatisation of social housing and the perception of social housing as the tenure of last resort.
Everyone else on the Council waiting list should be offered an equal chance.
After urgent emergency needs everyone should have equal chance.



Respondents were asked if they had agreed with the first part of the question, whether the proposed criteria, which includes homelessness, over-crowding, unsuitable living conditions and medical/social need were appropriate. The majority of respondents (95%) agreed with the proposed criteria, 2% disagreed and 3% did not know.

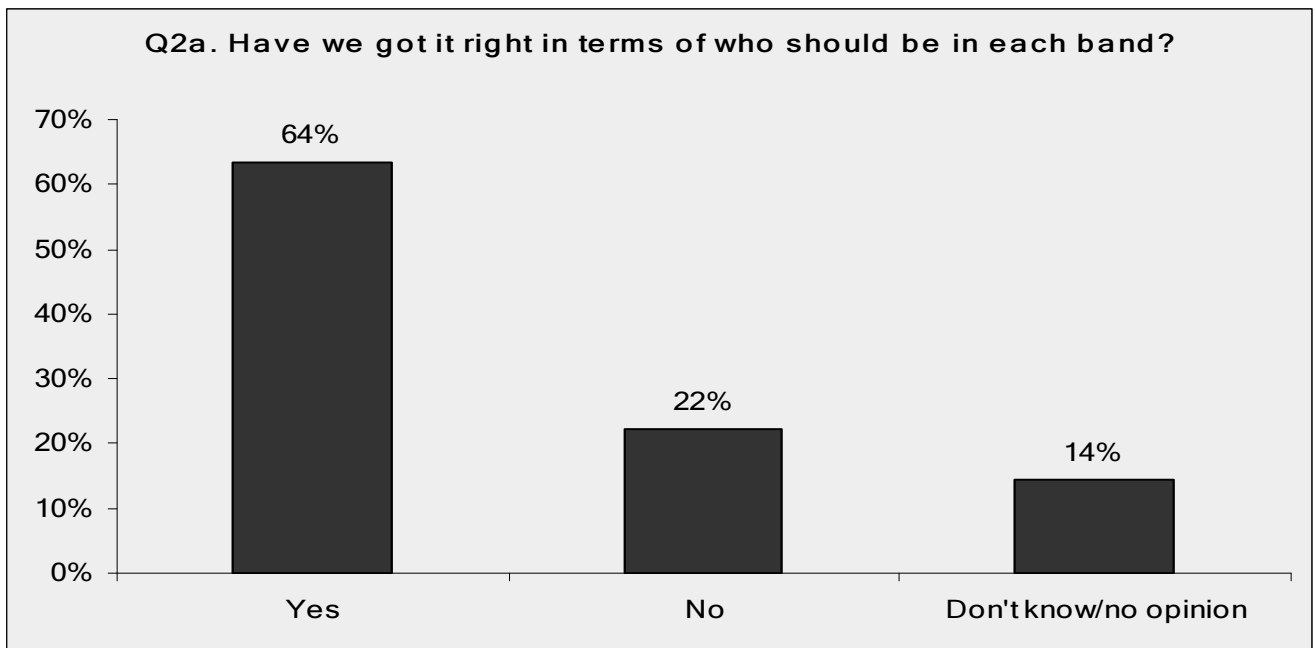
Respondents were asked to give further commentary to the answers. The comments made are detailed below:

Our older generation who may need some assistance/carer but are still maintaining some independence.
Needing to be near family when left on your own by the death of your spouse.
People on low income who now cannot afford private landlords rent.
Yes people that have fallen on bad times e.g. bankruptcy splitting from a long term relationship and the fact that someone works a full time job should not go against them.
Local people should be considered first of all.
No, but there are a few which should be excluded!!

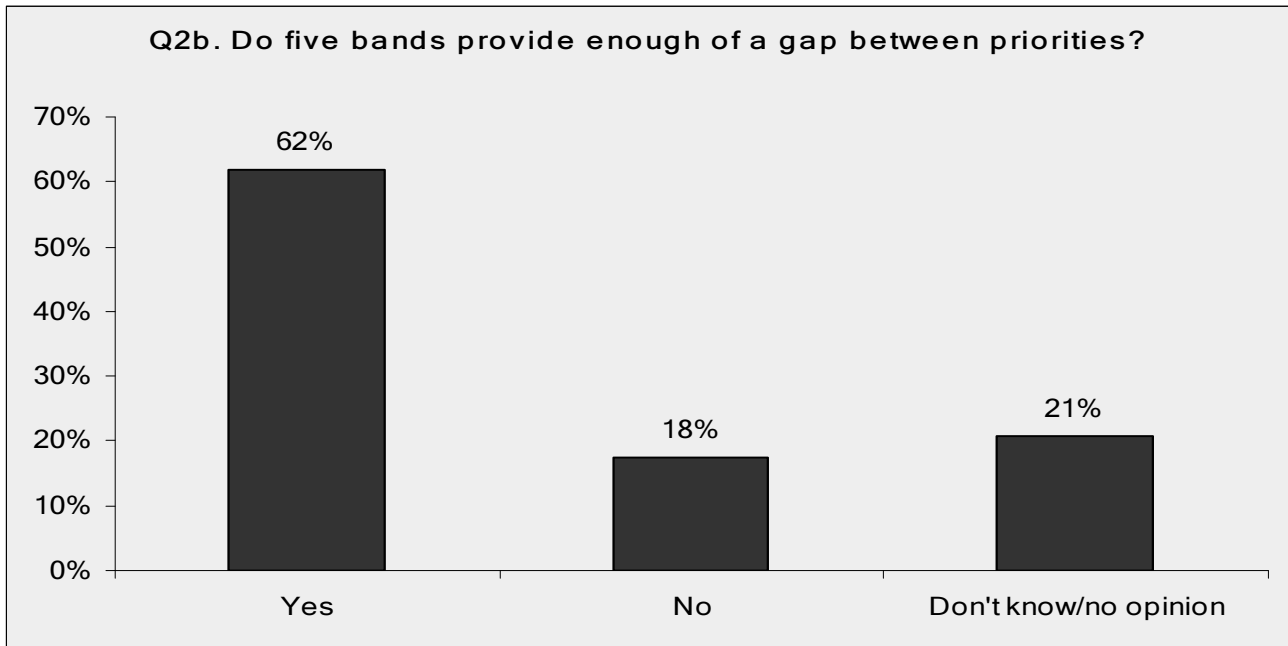
Summary:

- The majority of respondents felt the waiting list should be open to those people with a recognised housing need only. In addition, the majority agreed with the proposed criteria identified within the policy which includes homelessness, over crowding, unsuitable living conditions and medial/social needs.

Giving priority to applicants



The majority of respondents (64%) agreed that we had got it right in terms of who should be in each band. However, 22% did not agree and 14% did not know or have an opinion.

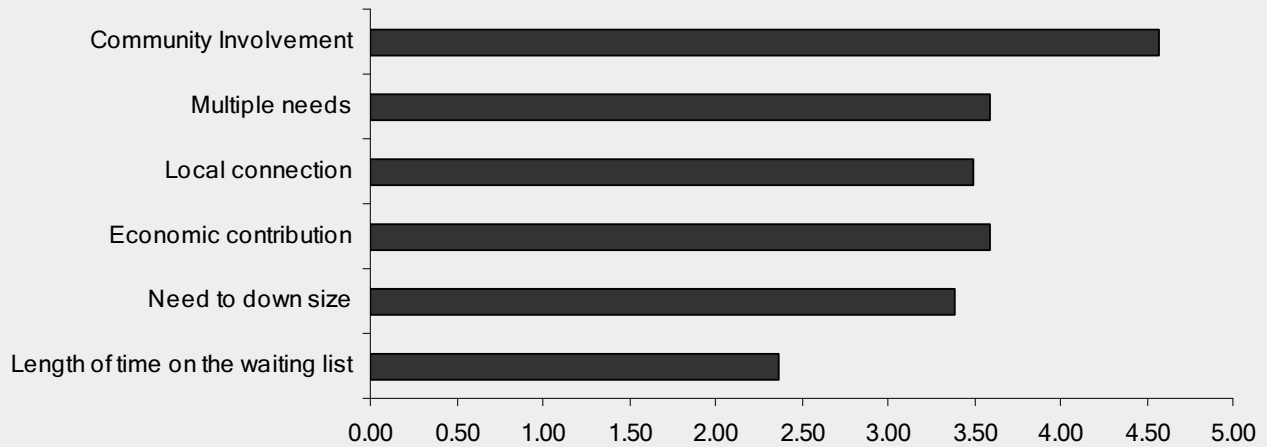


The majority of respondents (62%) felt the five bands did provide enough of a gap between the priorities. 18% did not agree and 21% had no opinion.

Respondents were asked to give further detail to the answers given in question 2a and 2b. The comments made are detailed below:

For Band 2 – refers to Insecure tenants served with a Notice Seeking Possession – does this mean Notice to Quit?
If the list is divided into five bands, the people at the bottom of the bands will never be given Council property to rent.
Band 5 should not include those that have a housing want. Only register those that have a housing need.
For people in these conditions to be allowed to move up the list on the waiting time as well as their housing conditions
I think that people who are not well and need to be nearer to transport links or shops or their illness gets worse, should be in band 3 at least
Too generalised - maybe add sub bands
I think people that work full time should be moved up on the list as getting people that can pay for housing would help the council itself generate more money to create more housing for the community.
Length of time on waiting list should be acknowledged.

Q2c. Other councils award additional preferences to split applicants with similar needs or to promote council objectives/values. If Bury was to do this, please rank the following list 1 - 6 in order of importance to you (1 = high, 6 = low)

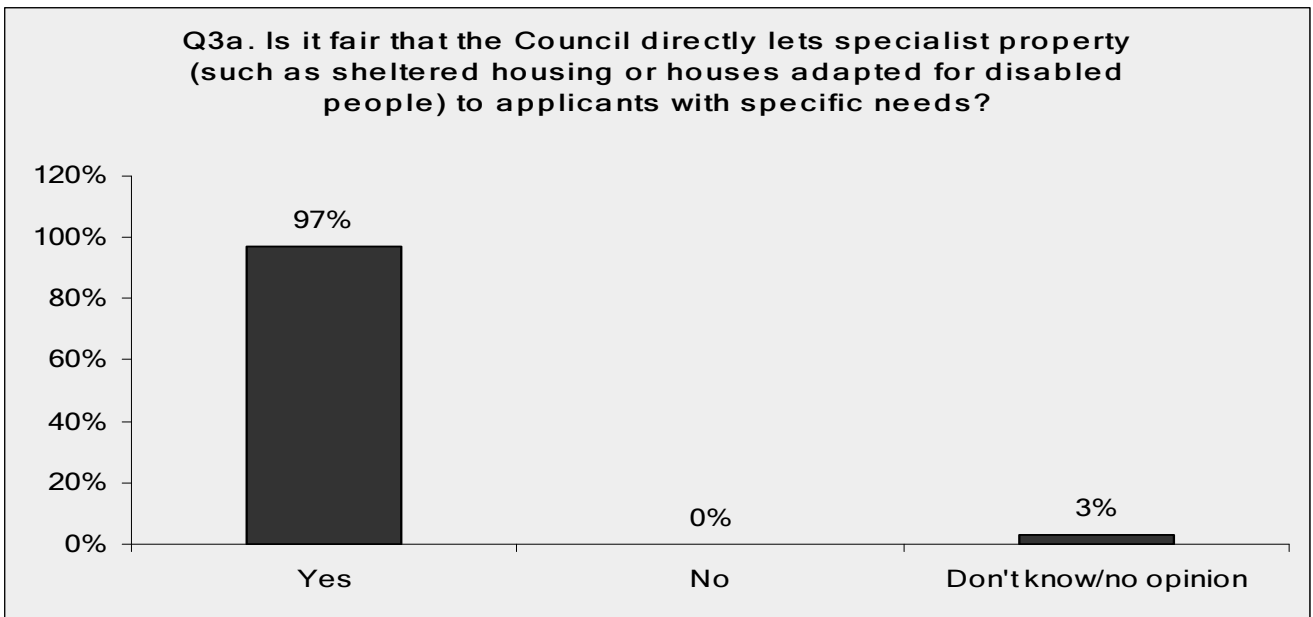


Respondents were asked to rank a number of additional preferences which are used by Councils to split applicants with similar needs or to promote the Council's values. The majority of respondents felt length of time on the waiting list was the most important. Giving priority for Community Involvement was the least popular.

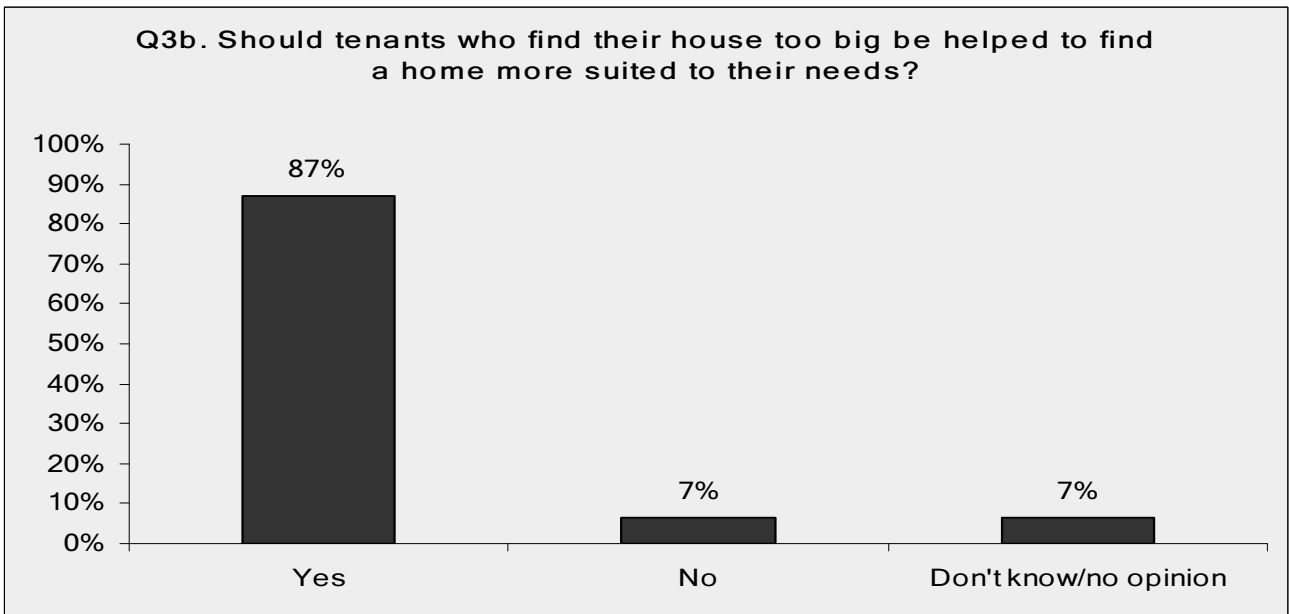
Summary:

- The majority of respondents agreed that we had got it right in terms of who should be in each band and felt the five bands did provide enough of a gap between the priorities.
- Length of time on the waiting list was the most important additional preference followed by need to downsize and local connection. Economic contribution and community involvement were seen to be the least important.

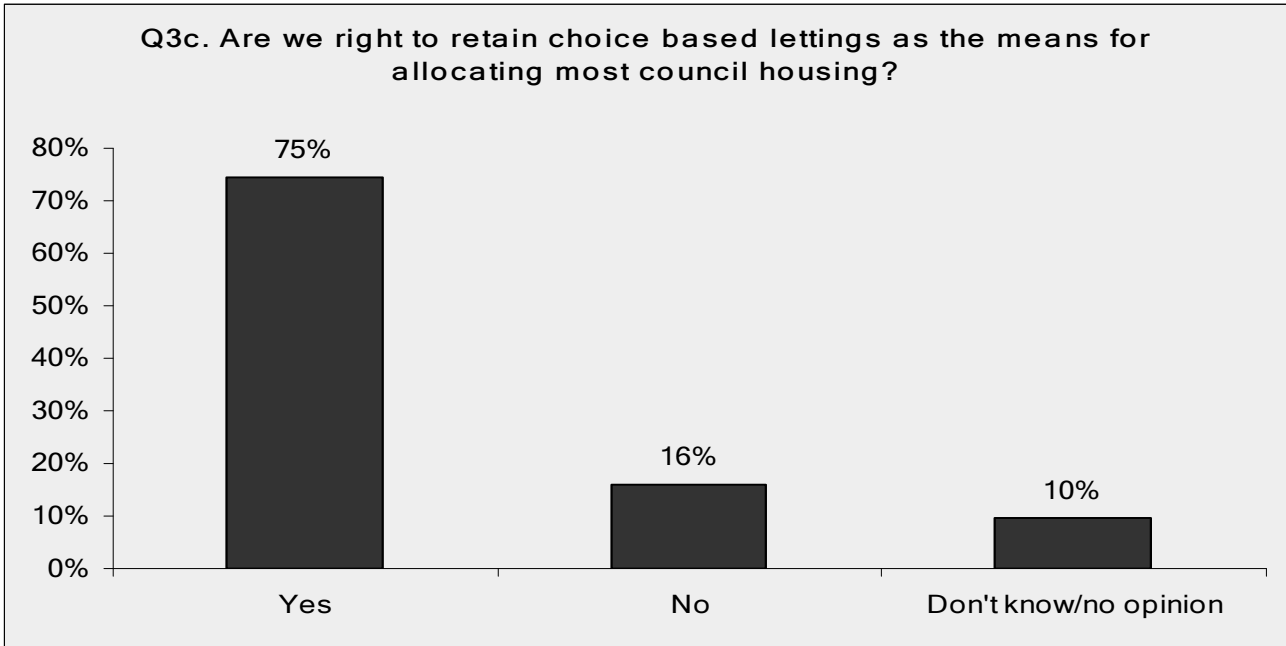
Choice and control



The majority of respondents (97%) felt it was fair to allow the Council to directly let specialist properties, such as sheltered housing or houses adapted for disabled people to applicants with a specific need.



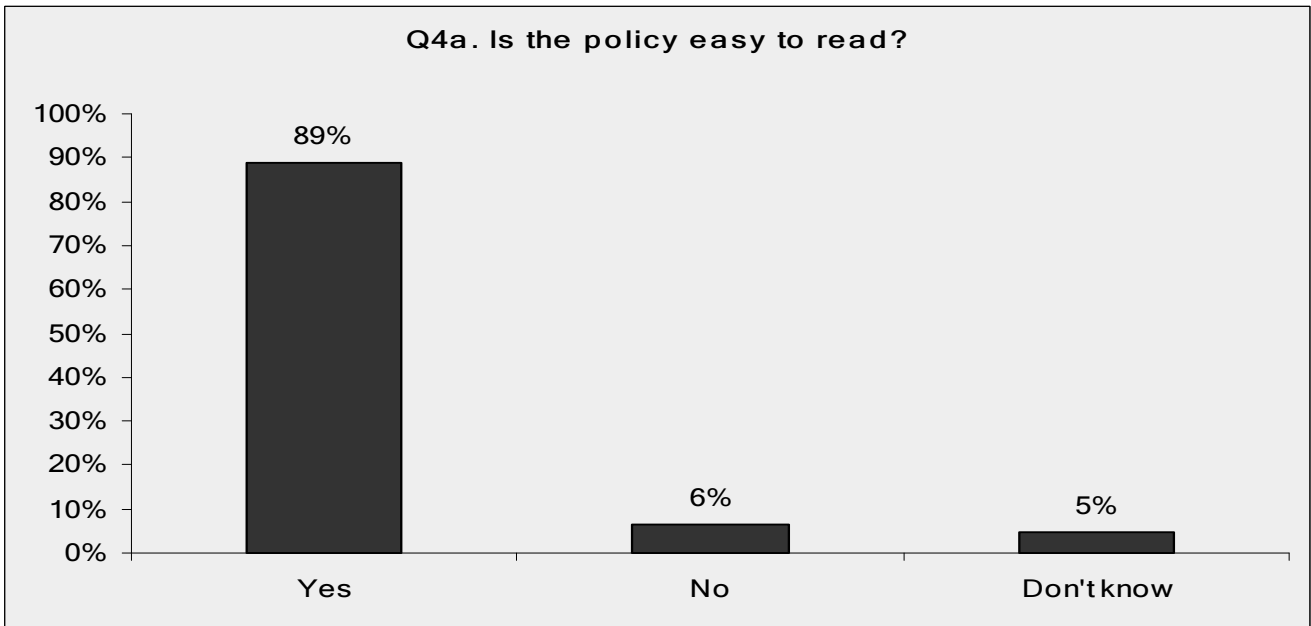
The majority of respondents felt that tenants should be helped to find more suitable accommodation if the property is too big. 7% disagreed and 7% did not have an opinion.



Summary:

- The majority of respondents felt it was fair to allow the Council to directly let specialist properties, such as sheltered housing or houses adapted for disabled people, to applicants with a specific need. In addition, respondents felt that tenants should be helped to find more suitable accommodation if the property was too big for their needs.

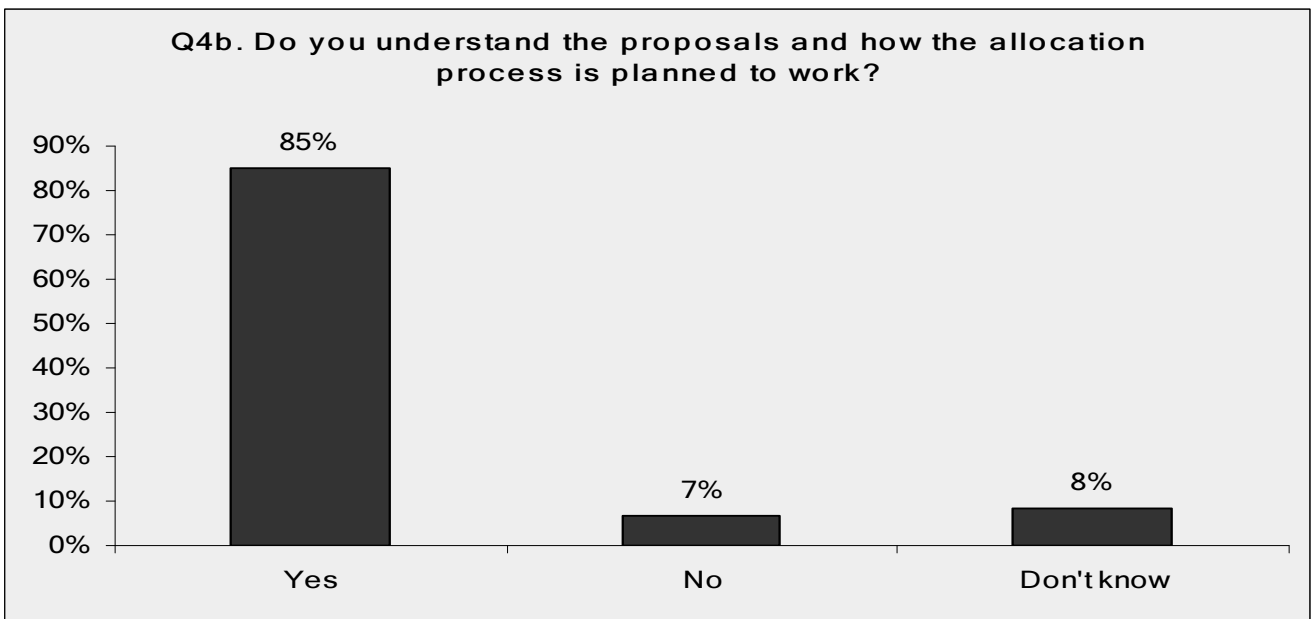
Format of the Policy



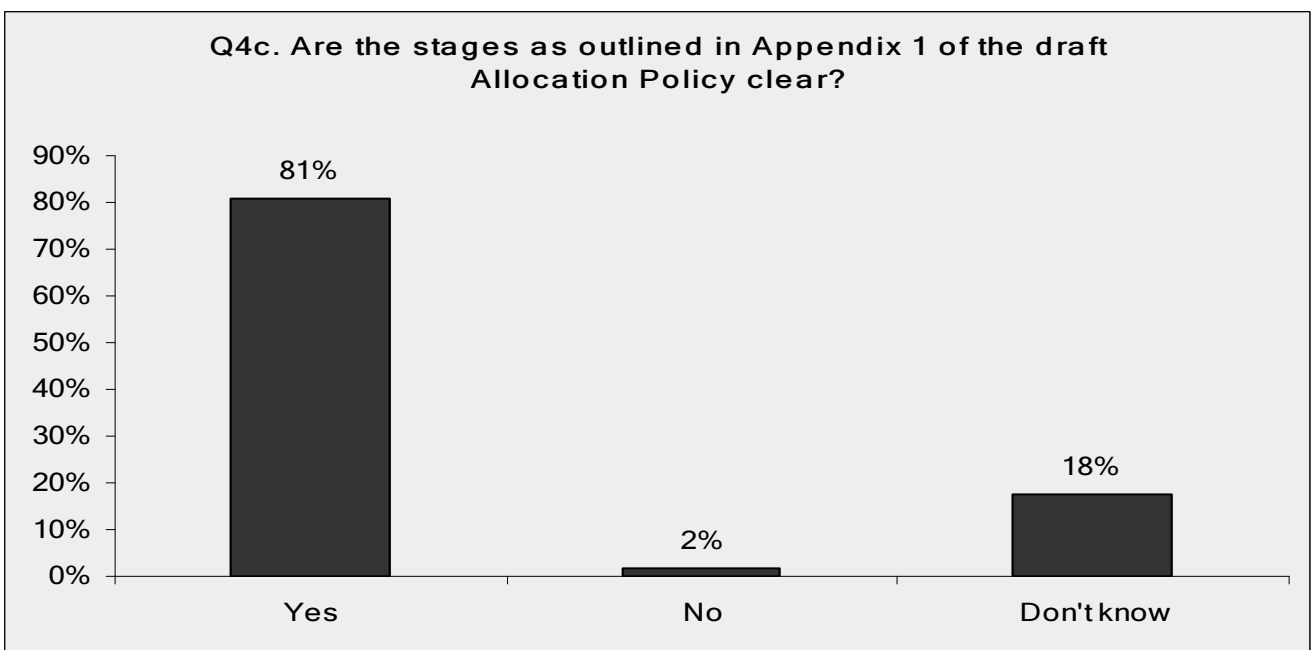
The majority of the respondents (89%) found the policy easy to read, 6% did not and 5% had no opinion.

Respondents were asked to give further detail to the answers given, these comments are detailed below:

A bit complicated in regards to band structure.
Too complicated
The 1 to 6 points award section of this survey is not available



The majority of respondents (85%) understood the proposals detailed within the policy and how the allocation process was planned to work.



The majority of respondents (81%) agreed that the stages as outlines in Appendix 1 of the draft policy were clear. 2% did not feel the stages were clear and 18% did not know.

You could make it clearer by simplifying it.
It's a bit complicated.
The page was the wrong way round
Just about

Summary:

- The majority of the respondents found the policy easy to read and understood the proposals and how the allocation process was planned to work. In addition, the stages as outlined in Appendix 1 were clear. However, some respondents did feel the policy was complicated in parts.

Respondents were asked for any additional comments to support the answers or additional points raised. These comments are listed below:

I feel that it is time for a radical overhaul of the Allocations Policy. I think the general public need to be informed of Council waiting list difficulties with regular updates and need re-educating about housing in general i.e. leaflets/websites/Housing blogs.
Working households and community contribution should get priority subject to local lettings policy. Band 5 shouldn't include those that have a housing want. Council resources are wasted on registering customers who will never be allocated a property. Should include special category to direct let properties that meet the wider Council ambitions and properties.
Flats which have been historically been for the elderly i.e. over 50 years old should remain. When they become ready for allocations but offered to those on waiting list with more priority.
People on the list who are overcrowded have no chance of even been considered for houses
Additional points: tenants should look after their property and gardens if they want to be re-housed. Tenants who pay rent should take priority over those who receive housing benefit and JSA. Tenants who have their children living with them full time should take priority over those who have weekend access. People should only be 'bidding' for properties they actually want and should be put back to the bottom of the list if they keep refusing houses. when being added to the re-housing list applicants should be told how long it may take for them to be re housed
People who have been waiting a long time on the list should be given more consideration
It appears that some of these policies are political & based on practices from some other country, which buy & sublet apartments while our own councils could in fact provide & improve localised tenancies from other persistently empty properties acquired from other housing agencies that are in need of repair. Much the same as the Housing Associations even on their basis of non profit. Governments in the past have taken council rent & rates money from our town & City Councils & used them for other forms of bureaucracy employments via building construction which solely appears to be based in the Victorian nature of things. Yet other more attractive house & Apartment designs seem to be readily available to be constructed around our picturesque seaside harbours.

Single bed accommodation for the elderly who need to move to sheltered housing is not always good for couples who are not in good health. Older people find difficulty in sleeping and sleep in separate bedrooms to avoid disturbing the other partner.

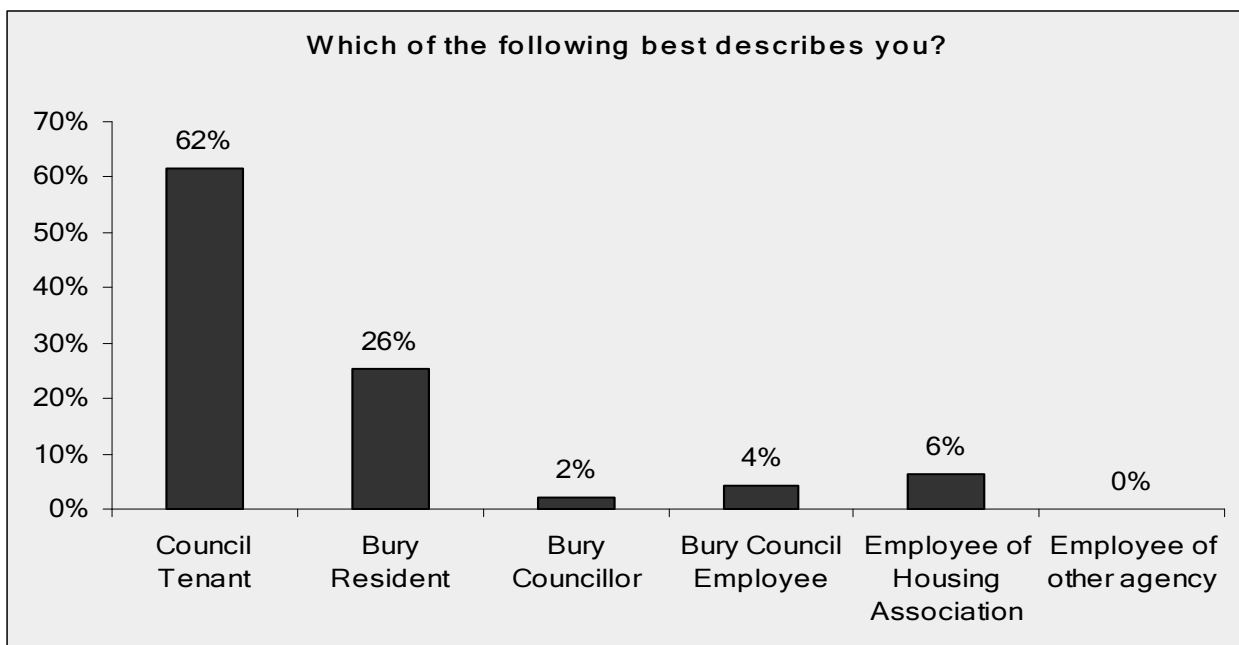
I believe that the local connection criteria should be tightened so that people who live out of the borough do not find it quite as easy to secure a property here.

I would like to see more done for people like me, I have just split from a long term relationship been made bankrupt but I still have a full time job. I found that because I (work) I am less likely to get a house even though I have 3 children 1 day and 3 nights a week I would only be able to have a 1 bed flat and I am not entitled to any benefits so I have to rent. This however has put me in a position where I struggle every month to survive as my bills work out more than what my wage is so I live in my overdraft I do not believe enough is done for people like my self and I believe this is wrong. As I am in full time work I would be able to pay the rent on a council property and this in turn will help the council to generate more funds for more development of council homes for those that need them.

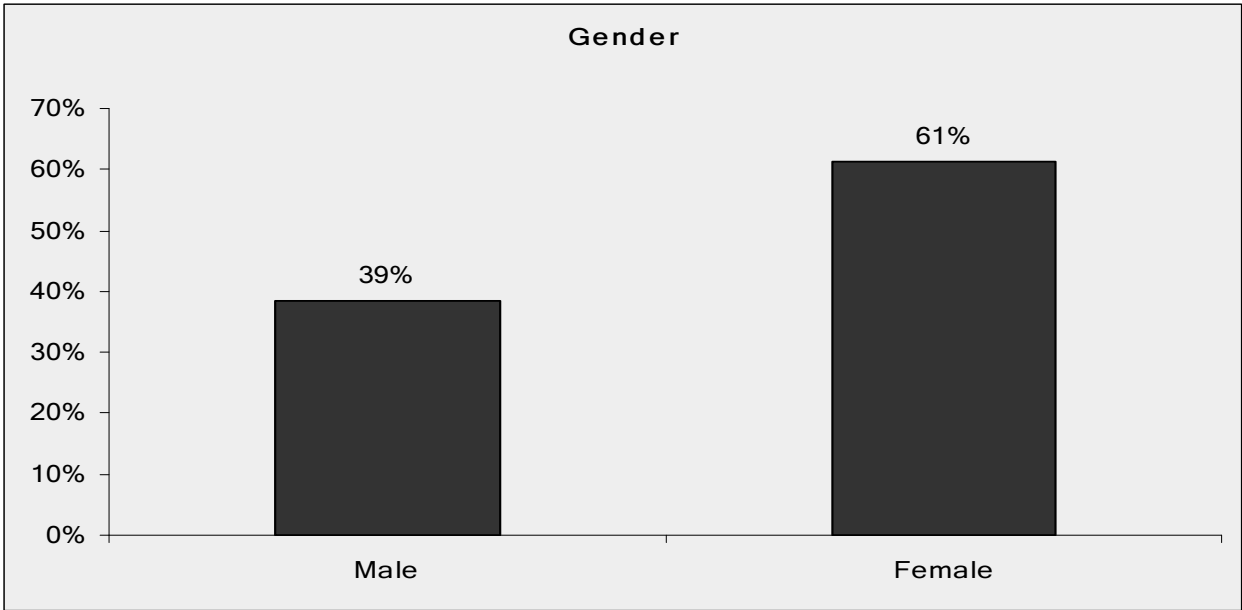
Although I agree with Choice Based Letting; I think the council should also consider the existing residents in the area and whether the applicant is suitable. Also, I totally disagree with the Right to Buy. I have always held the opinion that if you can afford to buy a property you shouldn't be living in a council house. If council properties have to be sold then those funds should be restricted then allocated towards new developments.

DEMOGRAPHICS

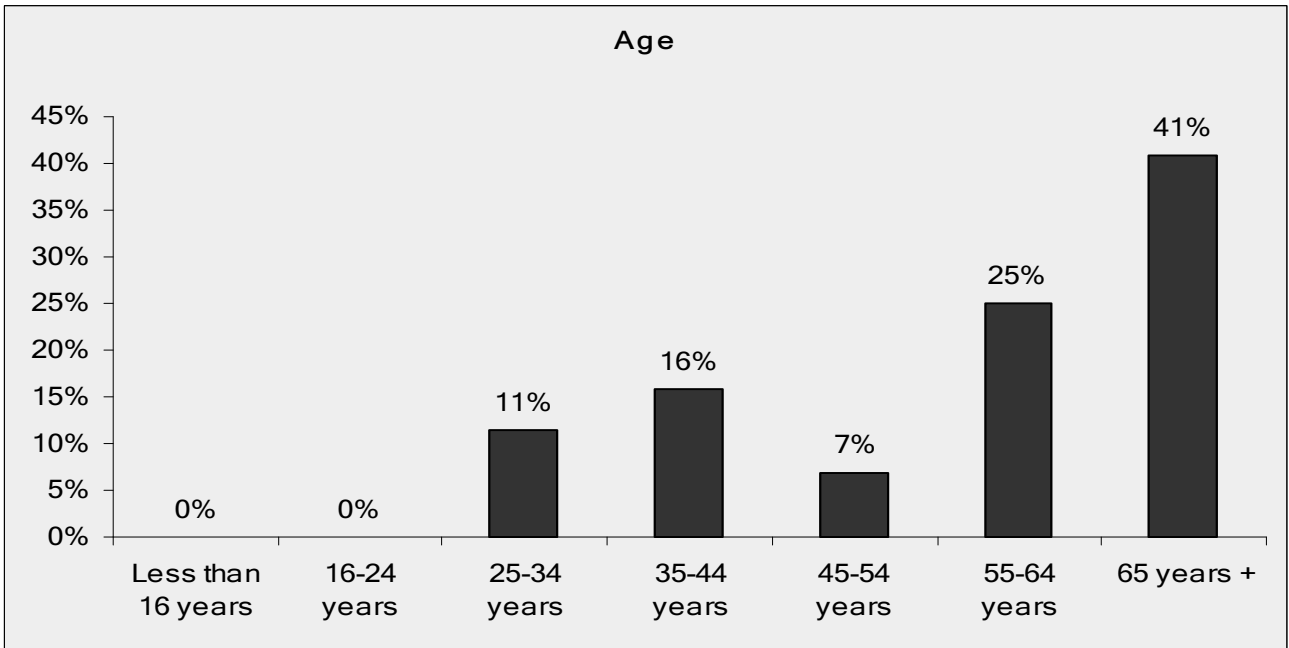
This sector of the analysis details the demographic breakdown of the respondents to the on-line survey.



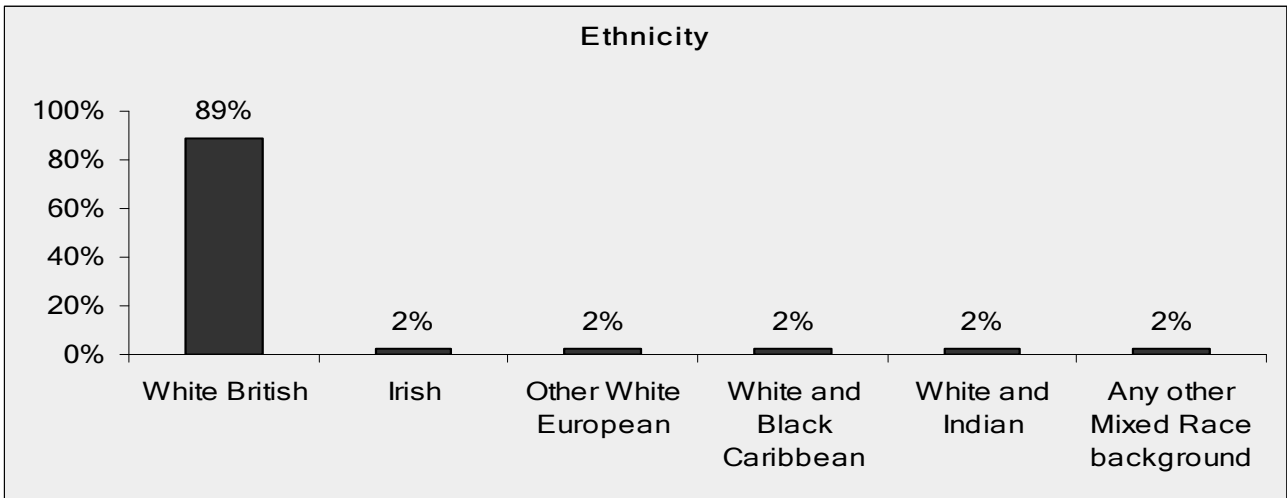
62% of the respondents said they were a Council Tenant, 26% said they were a Bury resident, 2% said they were a Bury Councillor, 4% said they were a Bury Council employee and 6% were employees of a housing association.



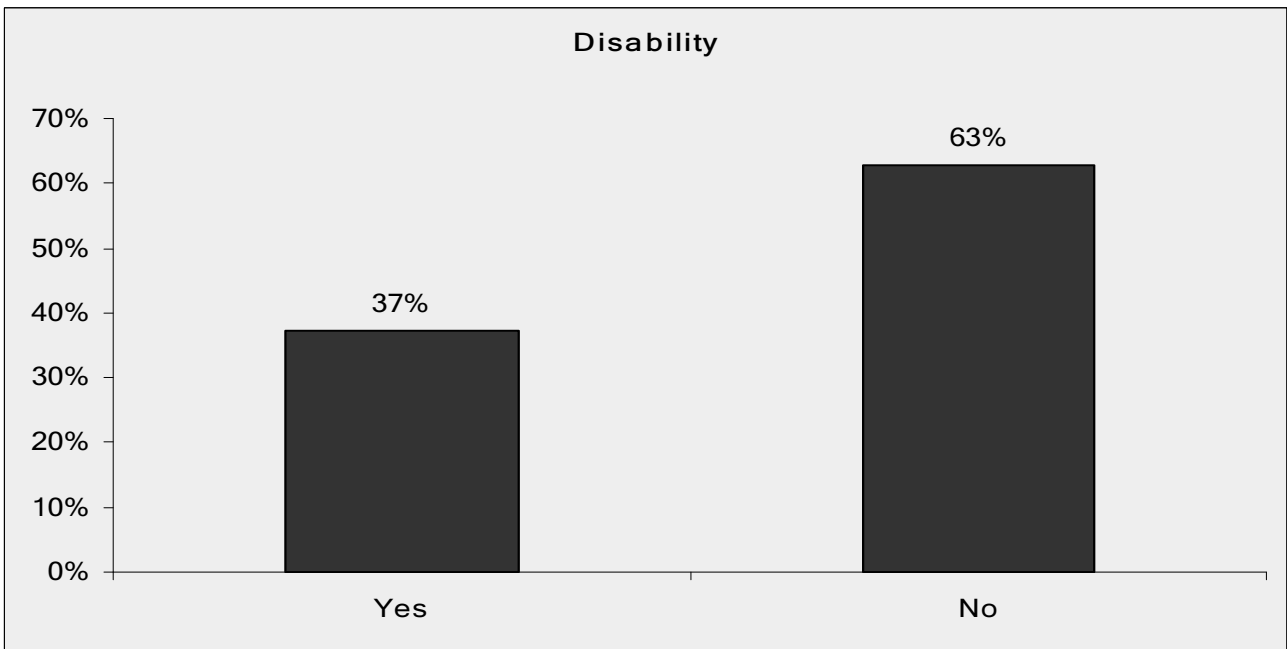
The majority of respondents were female (61%), 39% were male.



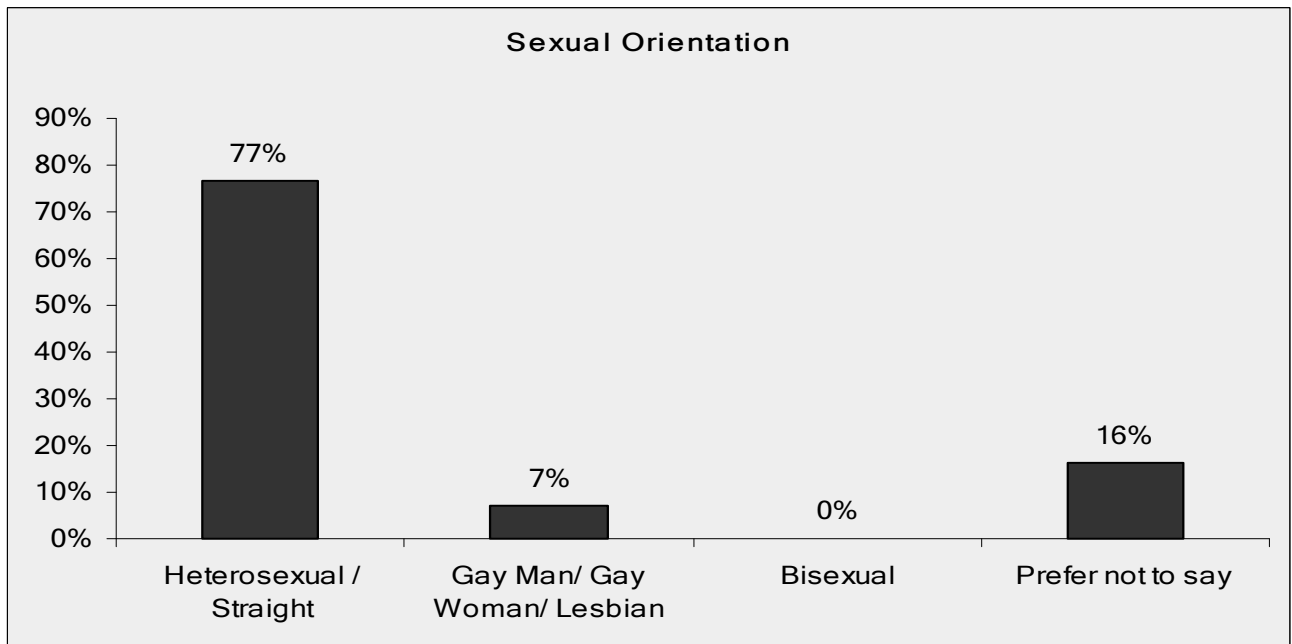
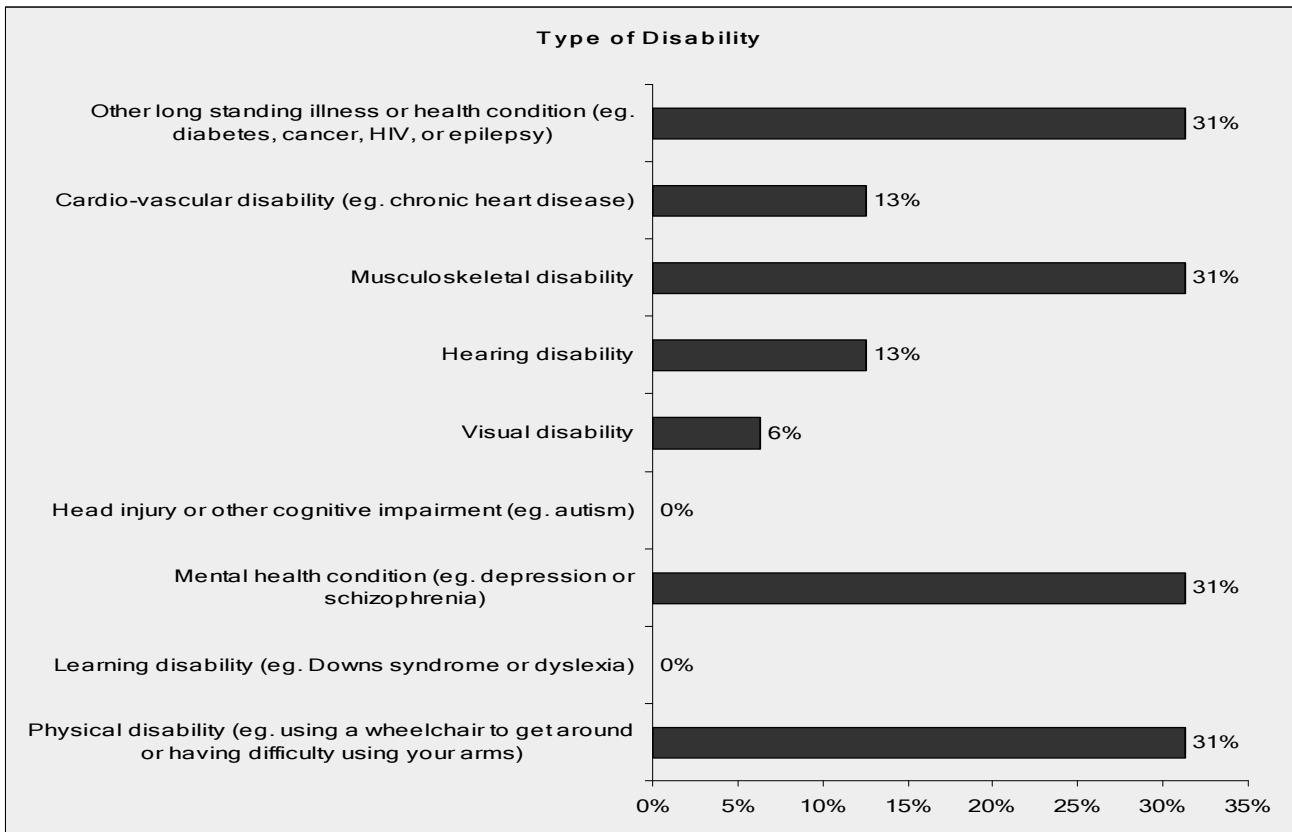
The majority of the respondents were aged 55 and over (66%).



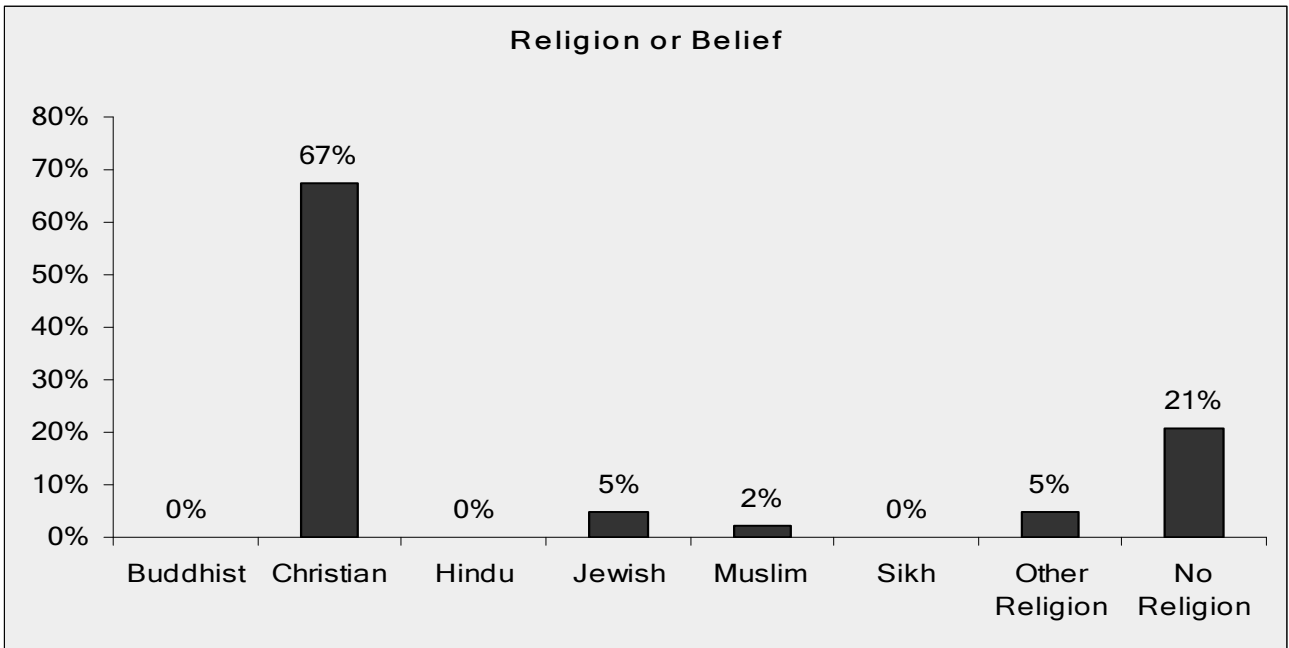
The majority of respondents were White British (88.9%).



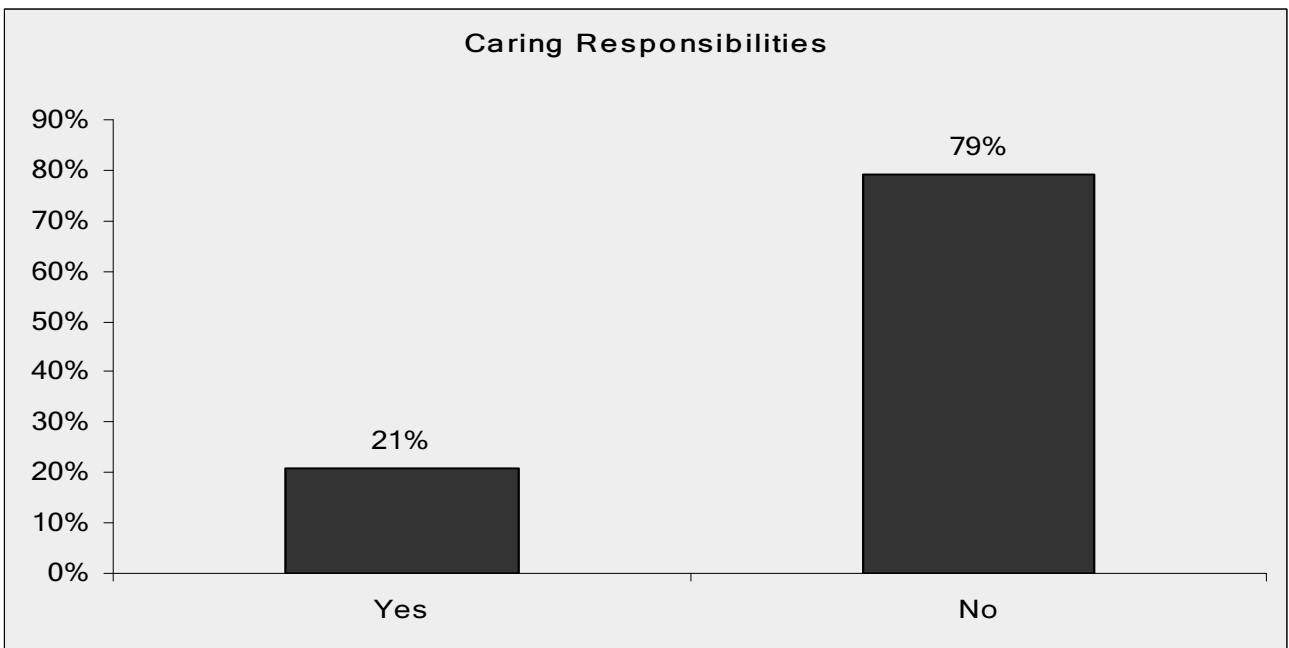
37% of the respondents said they had a disability. The next graph details the types of disabilities identified, with the majority stating another longstanding illness, a musculoskeletal disability, a mental health condition or a physical disability (31%).



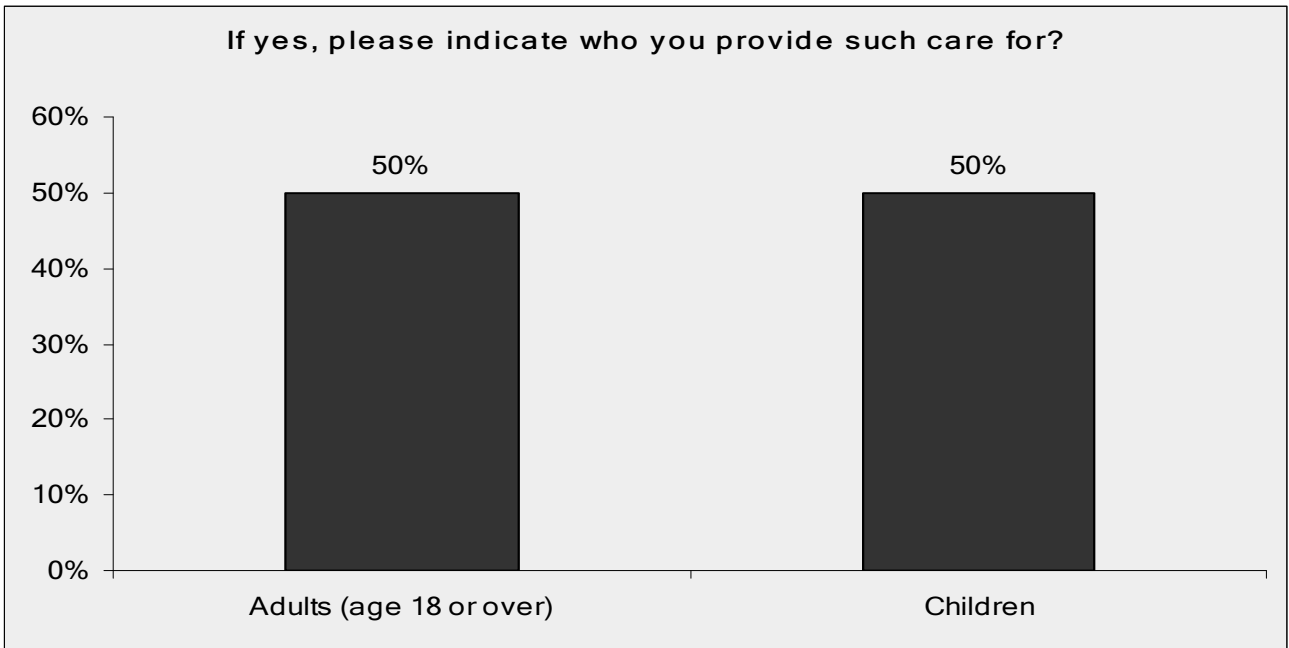
The majority of respondents said they were heterosexual (77%), 7% were gay and 16% preferred not to say.



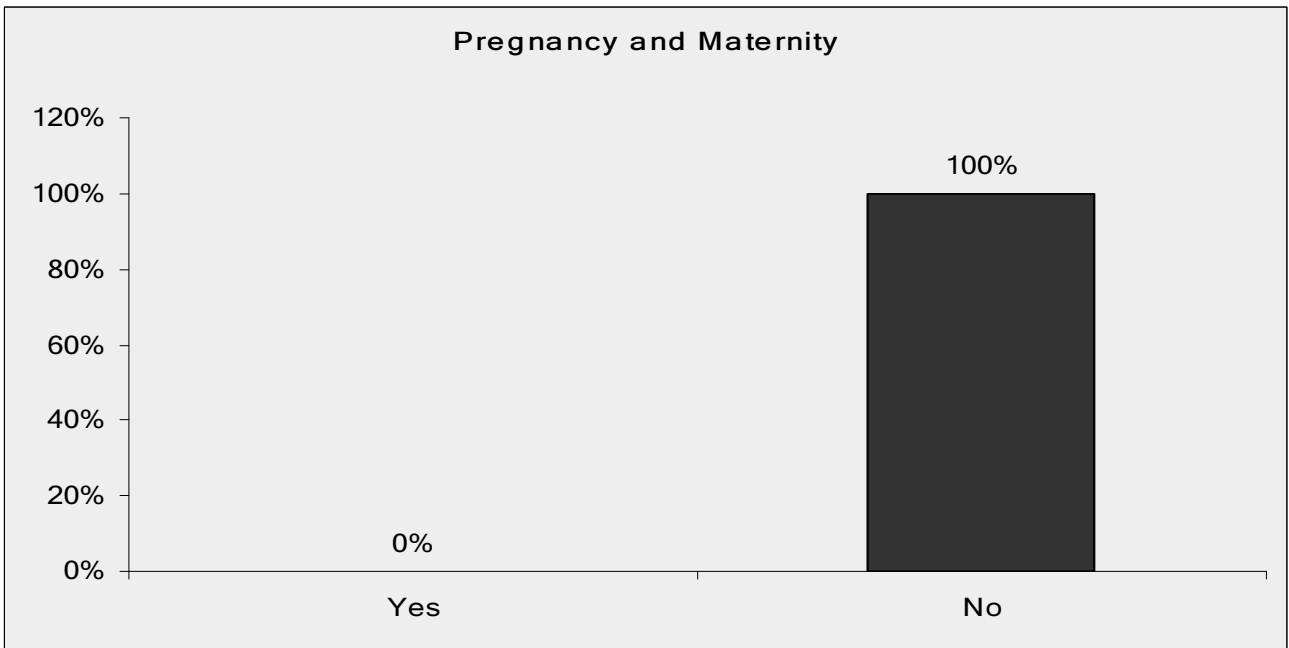
67% of the respondents said they were Christian. 5% were Jewish, 2% Muslim, 5% stated another religion and 21% did not specify a religion.



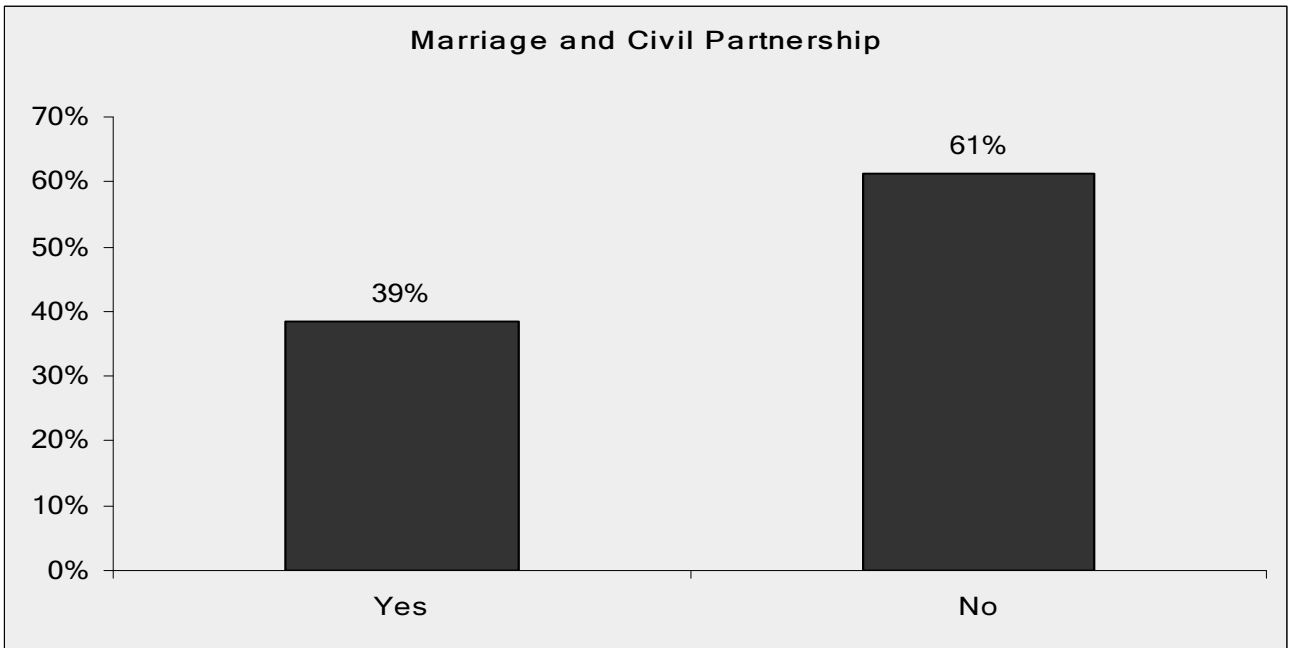
21% of the respondents identified a caring responsibility. 79% did not state they had a caring responsibility.



Those that identified a caring responsibility were asked to indicate who they provide care for. Half of the respondents said adults and the other half said children.



None of the respondents said they were pregnant or on maternity leave.



39% of the respondents said they were married or in a legally formed same sex civil partnership.