

Allocations Policy Consultation

APPENDIX 2

1. Staff Workshops held on 5 March and 7 March – attended by 19 members of staff
2. Resident Involvement Group meeting on 20 March – attended by 4 tenants and leaseholders, 1 councillor
3. Online survey via Survey Monkey – completed by 79 people (of those who provided information, 26 are tenants and 11 are applicants)
4. Registered Providers – 2 attended workshop, 1 contacted by e-mail with comments

Not all questions were asked to all groups due to consultation method and time available. Comments have been summarised and similar comments combined.

Question (and which groups were asked)	Comments/Suggestions	Response
Looking at the circumstances listed in the tables on pages 10-13 of the draft Allocations Policy. <ul style="list-style-type: none"> • Do you think the circumstances are in the correct bands? • Do you think that the wording is clear or any suggested amendments? • Is there anything missing that should be included (Groups 1 and 4)	Examples should be included to provide clarity	Guidance leaflet to be written and distributed to applicants and included on website
	Band 1 should be time limited	Band 1 will be reviewed every 12 weeks Band 2 will be reviewed every 26 weeks
	Statutory overcrowded - definition needs to be clearer, including involvement of an Environmental Health Officer	Wording amended. Now includes bedroom standard and statutory overcrowded
	Overcrowding – would be beneficial to refer to the bedroom standard	
	Fleeing violence – this should be a distinct category separate from homeless prevention	Amended definition of ‘Harassment’ category
	Non-statutory succession – this should be included in Band 2	As they do not have a statutory right this would give them a higher priority than they are entitled to
	Succession – need to amended wording to ‘to tenancy’ instead of ‘to property’	Wording amended
	High Medical Priority – need to state has to be	Wording amended. To specifically refer to

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	lasting condition	physical and mental health.
	Medical – need to refer to a procedure that will be followed	Guidance/procedure will be written. Definition amended to include mental health.
	Medical – should be reviewed regularly to see if still appropriate to have a high banding	
	Welfare – should also be included in Band 2 (example given of when a family member has committed suicide)	'High Welfare' category included in Band 2
	Employment – need more information	Amended to meet Right to Move requirements, included as separate section
	Witness protection – need to include as a distinct category separate from management move	'UK Protected Persons Scheme' (formally known as witness protection) category included in Band 1
	Demotion – should have a distinct demoted category to make it easier to manage	Demotion will not be used under the new policy. Applications will instead be suspended.
	Demotion – should be for 12mths rather than 6mths	
	Lodgers – have no security of tenure, so should be Band 3	Definition of category has been amended to distinguish between those who lodge with families and those who lodge elsewhere.
	Band 4 – is table needed, or just those not in Band 1,2 or 3	Amended with statement rather than table
Are there any other categories that should be included in Band 1?	Victims of domestic violence	This has been considered but will remain Band 2. Amended definition of 'Harassment' category
(Groups 2 and 3)	Victims of harassment – due to impact on wellbeing	

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		'Harassment' category
	Moves due to police recommendation – rather than dealt with as management direct lets	'UK Protected Persons Scheme' (formally known as witness protection) category included in Band 1
	Homeless applicants (<i>8 respondents gave this comment</i>)	Amendments made to reflect Homelessness Reduction Act: Main duty – Band 1 Prevention duty – Band 2 Other homeless – Band 3
	Ex-service personnel	Ex-service personnel will be given additional priority by increasing their band. Additional section added to policy.
	When someone is occupying an adapted property which the occupants do not need.	This will remain Band 2 under 'Unsuitable accommodation due to adaptations' category
	Over 60 years of age	Banding is awarded due to circumstances not age
In the draft policy applicants assessed as having no housing need, such as those whose current accommodation meets their requirements, are awarded Band 4. <ul style="list-style-type: none"> Do you think that applicants with no housing need should be able to join the list? (All groups)	Survey Monkey (all respondents) – Yes = 53.16%, No = 46.84% Survey Monkey (applicants only) – Yes = 45.45%, No = 54.54%	15% of lettings in 2017/18 were to applicants in Band 4, to remove would have a negative impact on average relet time The majority of lets in Band 4 were for Retirement Living properties, but to combine bands would not accurately
	If properties are rarely let to people in Band 4 than we should not have it, creates extra admin work	
	It is needed so that the Council does not have empty properties	
	If Retirement Living applicants were moved to Band 3 could delete Band 4	

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		reflect the difference in circumstances
	Should include that information on other options will be provided to those with no housing need e.g. private rent, mutual exchange	This is not included in the Allocations Policy but the Council does provide information on alternatives to applicants
	Long term residents of the borough should be allowed to remain on the list	Band 4 will remain for those with no housing need so will reflect these circumstances
	Affordability should be considered – current housing may be too expensive	
	Existing tenants should be given an opportunity to transfer even if they have no housing need	
<p>The draft policy allows for preference to be given to non-transfer applicants on some occasions. This means that people who are not currently a tenant of Broxtowe Borough Council have more chance of being allocated a property than those who are already a tenant.</p> <ul style="list-style-type: none"> Do you agree with this? <p>(All groups)</p>	Survey Monkey (all respondents) – Yes = 29.11%, No = 70.89% Survey Monkey (applicants only) – Yes = 27.27%, No = 72.72%	
	Should not be applicable to Band 1	Wording amended so this is not applicable to Band 1 applicants
	Need a criteria for which properties this will be used for and when it will not apply, should not be automatically applied	Wording amended so that properties are offered with preference to transfer applicants
	Current tenants have access to mutual exchange, this should be promoted	This is not included in the Allocations Policy but the Council does provide information on alternatives to applicants
	Council tenants already have security of tenure so their priority should be lower	This has been considered but no amendments have been made to lower the priority of Council tenants
	No preference should be given to either category, otherwise it is not a fair system, should be based on band and date only (5	The use of priority for transfers has been reviewed so that it is given on fewer occasions and does not apply to Band 1.

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	respondents gave this comment)	Wording amended in policy to reflect this.
<p>The draft policy states applicants can only apply for a transfer after they have been in their current accommodation for 12 months.</p> <ul style="list-style-type: none"> Do you agree with this? <p>(Group 1 and 4)</p>	<p>Will match new tenancy agreement</p> <p>Should include an exception for if circumstances change dramatically e.g. if they are awarded Bands 1 or 2</p> <p>Need to be clearer in policy about applicants who worsen their own circumstances</p>	<p>This is not included in the new tenancy agreement, has been removed from policy as no evidence to support that this is an issue</p>
<p>In the draft policy Homeowners or those with financial interest in property will not be allowed to join the list. Except if they are over 60 and applying for Retirement Living accommodation, or in Bands 1 or 2 who do not have the financial resources to enable them to resolve their housing needs.</p> <ul style="list-style-type: none"> Do you agree with this? <p>(All groups)</p>	<p>Survey Monkey (all respondents) – Yes = 84.81%, No = 15.19% Survey Monkey (applicants only) – Yes = 81.81%, No = 18.18%</p> <p>Need to specify an amount of equity and be able to reference it e.g. to 'Discount for Sale' amounts</p> <p>Amounts specified need to be different for different areas</p> <p>Consideration needs to be given to ability to resolve their own housing situation – complete a review</p> <p>Need to consider day-to-day finances not just equity</p> <p>Could allow but limit to Retirement Living properties only</p>	<p>Amended policy with explanation of procedure to be followed, which includes a full review of circumstances. Evidence that the property is for sale will be requested.</p> <p>The difference in prices will be considered as part of the full review of circumstances</p> <p>The ability to resolve their own housing situation will be considered as part of the full review of circumstances</p> <p>Considered, this would not be fair and reasonable for those applying for general needs accommodation</p>

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	Need to consider people who can't access or sell their own home due to a Homes Right Notice or relationship breakdown	Wording amended to reflect this in the policy, full details will be included in procedure
	Should be needs basis only, this would identify who can join the list	Considered, assessment is needs based but clarity is still needed within the policy on home ownership
<p>On some occasions the Council, or partner landlords, may want to use Local Lettings Policies. These are particularly appropriate for new build schemes, large estates and areas with problems of anti-social behaviour. These allow particular accommodation to be allocated to people of a particular description, for example, over a certain age.</p> <ul style="list-style-type: none"> Do you agree that these should be allowed under the Allocations Policy? In what circumstances do you think they should be used? <p>(All groups)</p>	<p>Survey Monkey (all respondents) – Yes = 76.62%, No = 23.38% Survey Monkey (applicants only) – Yes = 63.63%, No = 36.36%</p>	
		Use if properties are de-designated from Retirement Living
	Use for blocks that are split between Retirement Living and General Needs	Agree that this would be an appropriate use of a Local Lettings Policy
	Should be used on new build estates	Agree that this would be an appropriate use of a Local Lettings Policy
	Need a separate section on sensitive lets of individual properties	Section on sensitive lets included
<p>Many Council's penalise applicants for refusing a property, this can include reducing banding or suspending an application for a period of time.</p>	Penalty should be different depending on what Band the applicant is in – suspension for lower bands, demotion for higher bands	Considered, but demotion will not be used under the new policy. Applications will instead be suspended.
	Need to be clear that this won't apply to AutoBids	The use of Autobids will be reviewed as part of the implementation of the new policy

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<ul style="list-style-type: none"> • Do you think that this is something that Broxtowe should consider? • What actions should be taken? • In what circumstances? (Groups 1 and 4)	Penalise if people do not bid for a period of time e.g. 8 weeks or 12 weeks – especially if in high band	Considered, but this will not be implemented, there are many complex reasons why a suitable property may not be available within this timeframe
	Need a improved procedure for officer who has completed viewing to feedback on reasons and reasonableness	Procedure will be reviewed as part of the implementation of the new policy
The draft policy states that to qualify applicants must have been a resident in the borough of Broxtowe for 3 out of the last 5 years. <ul style="list-style-type: none"> • Do you think that this is sufficient or are amendments needed? • What would you suggest? (Groups 1 and 4)	Should be 5 years	Considered, will remain as 3 out of 5 years
	If does not match homeless legislation, policy would need to account for exceptions	Wording included to confirm that all applicants accepted as homeless will be eligible
The policy lists some checks that will be completed prior to an applicant joining the list. <ul style="list-style-type: none"> • Are there any other checks that should be completed? • Do you think that we should check whether a property is affordable for the applicant? (Groups 1 and 4)	Extra information – need to remove ‘nationality or immigration status’ as this is included in eligibility	Wording removed
	Extra information – change ‘may’ to ‘will’	Wording amended
	Some applicants with convictions should not be allowed on to the list rather than making decision at point of offer	Considered, amendments made. Full checks will be made at application for potential Bands 1 and 2 applicants. Checks for Bands 3 and 4 will be completed at point of offer.
	Include details on the declaration that applicants will be asked to sign	Full details will be included on declaration
Unpaid debts – should include Council Tax	Considered, but this will not be amended	

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	Affordability should be assessed for every applicant, including benefit check	Procedure for checks will be reviewed as part of the implementation of the new policy Section on tenancy checks added to policy
The draft policy allows direct offers to made in urgent management cases and for lower demand properties <ul style="list-style-type: none"> Are there any other circumstances where direct offers should be allowed? (Groups 1 and 4)	Adapted properties (another comment made that this should be reflected correctly in policy so that direct lets would not need to be used for adapted properties)	Wording accurately reflects the Council's Aids and Adaptations Policy regarding adapted properties
	Homeless applicants in our temporary accommodation	This will be reflected by appropriate banding
	Procedure needed so we can decide on case by case basis and evidence why	Wording amended. Procedure will provide examples and approval levels.
Additional comments (All groups)	We have a common Homelessness Strategy with Rushcliffe and Gedling but different Allocations Policies, we should reference this	Wording amended
	Risk assessments – need statement about their use	This will be included as part of pre-tenancy checks
	AutoBids – need to confirm our approach to using these	The use of Autobids will be reviewed as part of the implementation of the new policy
	Use of Retirement Living throughout document, considering the current review should other wording be used?	The name of the service is currently Retirement Living
	Working people should be given a higher priority than those not in work	Considered, but draft has not been amended
	Properties with gardens should be allocated to families	Considered, but draft has not been amended

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	Applicants should be means tested	Pre-tenancy checks will be completed
	People who are in financial trouble should be given priority	If their financial trouble is having an impact on their housing, this will be identified as Homelessness Prevention
	Applicants who can afford private rented should be given information about that and not be able to join the waiting list	Information is provided, but applicants are still allowed to join waiting list