

CABINET

22 January 2019

Title: Review of the Housing Allocations Policy	
Report of the Cabinet Member for Regeneration and Social Housing	
Open Report	For Decision
Wards Affected: All	Key Decision: Yes
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Accountable Strategic Leadership Director: Graeme Cooke, Director of Inclusive Growth	
Summary <p>This report proposes changes to the Housing Allocations Policy. These changes are designed to ensure:</p> <ul style="list-style-type: none">• that the process of working with partners to meet the needs of vulnerable groups is better planned and more transparent• that more working households on modest incomes in Barking & Dagenham access homes managed by the Council's Local Housing Company, Reside• that a clearer process for managing the allocation of homes to older people takes account of the full range of options available to older people and considers vulnerability as well as age as part of the assessment criteria;• that there is clearer guidance on which members of the household may be registered with the applicant• greater priority to those households under-occupying their home, to release more larger family homes for waiting families on the Housing Register. <p>It is proposed that these changes are subject to extensive consultation for 12 weeks and that the results are brought back to Cabinet.</p> <p>These proposals sit alongside a number of related pieces of work which together constitute key building blocks of the Council's approach to pursuing its goals and priorities for housing in the borough – as a core strand of our emerging strategy for Inclusive Growth. In particular, the proposals should be seen as companions to the papers on the homelessness strategy and the update on the reinvigoration of Reside (plus work under way on housing pathways for vulnerable residents, the update to the Housing Revenue Account business plan and the tenure and size mix of future housing supply in the borough).</p>	
Recommendation(s) <p>The Cabinet is recommended to:</p>	

- (i) Approve the proposed changes to the Housing Allocations Policy for consultation with those affected, and relevant partners;
- (ii) Note that a further report setting out the results of the consultation and proposing a new Allocations Policy shall be brought back to Cabinet for final approval; and
- (iii) Delegate authority to the Director of Law and Governance, in consultation with the Cabinet Member for Regeneration and Social Housing and the Director of Inclusive Growth, to approve any variations to Reside documents that are necessary to ensure that Reside adheres to the allocation policies as approved by the Council.

Reason(s)

Councils are obliged to have a published scheme which sets out how they decide to allocate any social housing that is within their authority. This includes both social housing owned by the Council, and nominations to Housing Association partners. In addition, the Council needs a published scheme setting out how homes managed by Reside, the Council's wholly owned housing company are let.

There is increasing pressure on homes available for social lets and therefore it is vital that we are using them according to transparent and deliberate criteria.

The significant increase in the number of homes owned and managed by our local housing company, Reside means that we need to review the arrangements for letting them, and ensure that these valuable resources are used to support local working people.

Across the Council a range of social services need to fulfil their duties by assisting their clients with housing solutions. The Allocations Policy can better support the wider changes to people services across the council, in both Community Solutions, Adult Social Care and Children's Services and ensure that they are more effective in finding the right housing solution for their clients.

1. Introduction and Background

1.1 The Allocations Policy sets out how the Council decides who will be offered social and affordable housing and on what basis. It is therefore one of the Council's most important housing policies. The last full review of the Allocations Policy was carried out in 2014 and a new Allocations Policy adopted by Cabinet on 8th April 2014. This policy was initially only applied to new applicants, and for a time the Council operated two Allocations Policies side by side. By a further decision on 15th September 2015 Cabinet approved the adoption of the new rules, retrospectively to all applicants. The key features of the new policy included:

- A Residential Qualification for applicants of three years' residence
- Certain exclusions from the Register, including owner occupiers
- Additional priority for working households
- The use of flexible tenancies in certain limited cases
- The adoption of a policy to enable the Council to discharge its duty to homeless households into the Private Rented Sector.

- 1.2 A simple basic Allocations Policy was adopted for the Reside Properties (the Council's wholly owned housing company) on 13th November 2012, and subsequently incorporated into the main Allocations Policy as a sub-section.
- 1.3 It is essential that the Allocations Policy is reviewed from time to time to ensure that it is updated in line with legislation, regulation guidance, case law and current Council goals and priorities. As such, this report sets out some proposed changes to the Allocations Policy to reflect changes that have occurred since the two policies were adopted and seeks authority to consult extensively about the proposed changes. Consultation with Housing Association partners is a statutory requirement for Allocations Policies; it is also a requirement to consult with those affected when changes are made to policies affecting social housing tenants (s105 Housing Act 1985).
- 1.4 The proposed changes to the Allocations Policy are taking place alongside other important work to improve the Council's housing offer. First, Reside itself is undergoing a transformation programme. The first special purpose vehicles (SPVs) which hold 810 properties are let and managed by staff in My Place and supported by special project officers, an arrangement which has kept the project going through the early years. Now, with further expansion planned, the Reside transition programme is set to recruit dedicated staff and an independent board. The Council will set the Allocations Policy for Reside homes, and the Board will be responsible for operational matters. It is the Council's vision that Reside will play an important part in meeting the housing need of local people. The pipeline of new homes owned and managed by Reside will be significant, and it is important to have in place an Allocations Policy that ensures that these homes contribute significantly to meeting housing need in Barking and Dagenham.
- 1.5 At the same time as this report, an updated Homelessness Strategy is being presented to Cabinet. This statutory document will respond to the new Homelessness Reduction Act 2018 and is seeking to improve the Council's ability to prevent homelessness where possible, and to intervene in situations to prevent a crisis at the earliest possible stage. This will include the development of options and pathways for vulnerable households (such as those with a history of mental health illness or Learning difficulties). The revised Allocations Policy will consider the need to support the aims of preventing homelessness where possible and trying to prevent housing or support needs becoming a crisis (including using Temporary Accommodation and then permanently discharging the council's housing duty).
- 1.6 Because the Allocations Policy is a way of rationing resources between different categories of housing need, the overall context of housing need and supply is relevant. Research has been undertaken jointly with Planning colleagues in Be First to establish the overall housing need in the borough. The overall numbers are relatively simple because there is an established methodology within the National Planning Policy Framework (NPPF) to calculate this. This is not enough to help plan to meet the needs of different income groups; and additional work over and above the Strategic Housing Market Assessment (SHMA) is being done to establish the housing need of the borough by tenure and rent levels, and the housing needs of particular groups, such as older people, students, households with support needs. This work is now ready and will guide the Borough in ensuring that the forward programme of new supply is in the right locations, at the right price and of the right size and tenure.

- 1.7 Work has also taken place to review the housing pathway for older people and consider the case for developing additional extra care accommodation to enable residents to live independently for longer. This work is being expanded to review the housing options and pathways for key groups of vulnerable residents. The Allocations Policy is a key element in developing and implementing these pathways; setting out explicitly the way in which both existing and new homes are allocated, building on best practice to ensure that both housing and care needs are appropriately met. As the Older People's Pathway work is implemented there may be a need for a further review of this aspect of the allocations process.
- 1.8 Finally, the establishment of the new structure of the Council is designed to drive forward a new ethos for the Council, managing demand by rebalancing the relationship between the Council and its citizens so that they become more active, independent and self-reliant; and are fully engaged in finding solutions to their problems. The Allocations Policy can support this direction of travel by the messages it gives, and the behaviour it encourages. In particular, the Allocations Policy needs to support the messaging about housing options being developed and promoted by Community Solutions – and the approach of frontline staff to working with residents in housing need.

2 Current Allocations Policy

- 2.1 The current Allocations Policy, covering all Housing Revenue Account (HRA) secure lettings, Registered Social Lettings (RSL) nominations and Reside Lettings of properties at 50% market rents, was adopted in November 2015. This section briefly sets out the current Allocations Policy and how it works. A copy of the current Allocations Policy is attached as Appendix 3.
- 2.2 Lettings of social rented properties within the HRA are carried out either through Choice Based Lettings (CBL) or via a Direct Offer by Community Solutions staff. To be eligible to register, an applicant must have a right to remain in the UK, be over the age of 18 and have at least 3 years' residence in the Borough. There are exceptions to the 3 years' residence requirements. These are: current Council tenants; homeless households to whom a duty has been accepted, those being discharged from the Armed Forces and a limited number of other exceptional cases. Some people are excluded from being able to register: e.g., home owners, and people who have been evicted from a previous tenancy for antisocial behaviour, or fraud.
- 2.3 The Allocations Policy allows anyone to register in conjunction with the applicant who can "reasonably be expected to reside with" the applicant. This is relatively generous compared to neighbouring boroughs, who define those who can be included on the application more narrowly to include only those in the immediate family and those who need to live with the applicant to either give or receive care. The reason for this is that most boroughs have very few larger properties and extended families can wait an inordinate amount of time for assistance – or indeed may never be assisted if they all wish to live together.
- 2.4. Barking & Dagenham operate a banding system. This means that there are groups of applicants in Bands from the highest Band to the lowest Band.

Bottom Band – Reasonable Preference	The lowest band of cases are those who have one characteristic from the “Reasonable Preference” categories listed in the <u>Housing Act 1996</u> . These characteristics are: overcrowding, insanitary conditions, homelessness, a medical or a welfare need to move, or a need to move because of financial hardship. There is one local additional preference category, which is that either the applicant or partner is working.
Second Band – Cumulative Preference	The second band up, includes everyone who has two or more of these characteristics together
Third Band – Additional Preference	The third band is those who have a reasonable preference characteristic, but who also have an urgent reason to move, such as the fact that they have a serious urgent medical condition, or if they are in fear of violence.
Top Band – Decant cases	These are people who must be moved from their home permanently, because their home is going to be demolished. They are the highest priority.

2.5 An applicant’s priority can be reduced if they have rent arrears, or have been convicted of unacceptable behaviour, or are subject to a Notice of Seeking Possession (NOSP). Home visits are carried out to verify the details of applicants; and applicants have a duty to report any change in their circumstances. Applicants complete a paper form which they can download from the Council’s website; and once they have been accepted and registered, they receive a pin number, and can bid through the Choice Based Lettings system.

2.6 Choice Based Lettings

About half of all lettings are let through the “Choice Based Lettings system”, with the number of properties available through this route a function of those ‘left over’ after decisions to make direct let offers have been made (see below). Applicants who have registered can look at the weekly list of properties advertised as being available to let; and they can bid for up to three properties. The CBL system sorts them out in the priority order established by the Allocations Policy. Those in the top band would be the highest priority, and then if there are more than one applicant in this band, they are sorted out into the date order on which they were placed in the band. If no one from the top band has bid, then those in the second band will be the highest priority; again, if there are more than one person in this band bidding, then they will be sorted out into date order, the date on which they entered that band. and so on, down the bands.

2.7 Direct Lets

The other properties are directly let, with an officer deciding in line with the Allocations Policy who to let a property to and offering it directly to that applicant. When a property becomes available, the Community Solutions staff decide whether to advertise it, or to use it for one of the Direct Let groups. Allocations staff need a good knowledge of

the housing stock, and the characteristics of the properties that become available. When a property becomes available, they make a judgement based on those property characteristics, whether to advertise it, or to make a direct let. The decision whether to advertise a property or use it for another queue, is based on:

- The property characteristics and its desirability
- The pressure to meet specific needs as expressed by service managers of particular need groups (e.g. those in temporary accommodation, Adult Social Care (ASC) partners who need to assist vulnerable groups)
- Commitments to partners and the groups of vulnerable residents they support.

2.8 Allocations are made to the following groups or categories of residents:

- Decants – these are people whose homes are due to be demolished as a result of estate regeneration programmes
- Homeless households in temporary accommodation
- Referrals, where cases are referred from a partner agency or another council department supporting a vulnerable person in the community
- General Needs Register – also known as the Waiting List

Applicants who are being decanted for estate renewal schemes, a homeless household to whom we have accepted a duty, and applicants on the General Needs Register can all bid through Choice Based Lettings. Referral groups are made direct offers, and the Council retains the right to make a direct offer in other categories where an applicant is not bidding or has not been successful in bidding.

2.9 Referrals are arrangements made with other council services or external partners who provide short term supported accommodation, and whose schemes will become ineffective if the residents are not able to move on to more permanent accommodation in due course.

2.10 An important point to note about the way in which the Allocations Policy is currently implemented is that there is no forecasting or planning for what number or proportion of new lets are targeted to these main groups or categories of potential beneficiaries, say on an annual basis. The aim of the new Policy is to ensure that there is a process of strategic planning in the way in which allocations are made; against a clear set of principles and criteria.

2.11 Allocations for sheltered, extra care and adapted properties operate separately. There is a dedicated Community Solutions Officer whose job is to assess the Sheltered Housing applicants. As Sheltered housing is not specifically mentioned in our current Allocations Policy applicants are assessed in line with the same housing needs as set out above, except that there is currently an age qualification of 55+ for these properties. However as Sheltered Housing applicants are much more likely to be sensitive to geographical issues, there is more sensitivity exercised in accommodating the applicants' needs and preferences.

2.12 Adapted properties are also dealt with differently. There is a dedicated officer whose role is to understand the nature of the disabilities of each applicant on the Register who needs adapted housing (there are around 360 at the present time). When an adapted property becomes available, they will liaise with an Occupational Therapist

to ensure that an up to date assessment is carried out and that the specific property is suitable for the needs of the applicant. When allocating a particular property, they will take into account:

- Adaptation need
- Priority level – (each of the bands as set out above)
- Waiting time

If there is a medical emergency then a member of Community Solutions staff may be either able to increase the banding, or alternatively complete a delegated authority for a decision outside Policy.

2.13 In terms of numbers, the volume of HRA and 50% market rent Reside lettings carried out in the last five years is set out below:

	2013/14	2014/15	2015/16	2016/17	2017/18
1 Sheltered	109	91	89	102	86
2 Adapted	132	174	180	123	127
3 Decants	148	93	117	138	87
4 Homeless from TA	281	450	369	239	192
5 Referrals	148	167	77	112	80
6 Other – CBL	174	386	341	125	174
<i>Total general needs (3, 4, 5 and 6)</i>	<i>751</i>	<i>1096</i>	<i>904</i>	<i>604</i>	<i>533</i>
Total	992	1361	1173	839	746

NB The temporary increase in the number of lettings in 2014/15 and 2015/16 was due to the HRA New Build programme after the introduction of Self Financing. (Self-Financing removed the financial disincentive to building new homes within the HRA).

2.14 Reside Lettings Policy

The Council, as 100% shareholder in Reside, has ensured that the Allocations Policy has been incorporated into each of Reside scheme's legal transfer documents. The Reside Board then determines the operational arrangements. These policies (which currently determine how Reside properties are allocated) are contained within the overall Council Allocations Policy, but it is very brief and broad brush. Properties managed by Reside at 50% market rents are let in line with the current Allocations Policy for HRA properties (discussed above). The separate section on Affordable Housing lettings sets out the priority order in which affordable rented properties – rents set at between 65% and 80% of market rents – are let. The categories for rented properties are, in priority order:

- ▶ Council tenants and RSL tenants within the Borough (in employment)
- ▶ Those on the Housing Register (in employment)
- ▶ Working Households resident in the Borough

- ▶ Households not resident but working in the borough
- ▶ Households working but not in the Borough

- 2.15 Within those categories, households are prioritised in date order, based on the date on which they applied. There is a list of people who have expressed an interest in these properties, and the officers in the team will contact them, each category in turn with those in Category 1 having priority over those in Category 2, and then Category 3. If there is more than one applicant in the category, then these applicants are dealt with in date order.
- 2.16 Reside Lettings are carried out by My Place staff, on behalf of the company. Reside set out on their website the way in which people can apply for affordable housing. There is an income cap for Reside affordable lettings: applicants should not be earning more than £66,000 if they are applying for a one or two bed property, or more than £80,000 if they are seeking a three or four bed property. They then apply a rule which says that they should not be spending more than 35% of their gross household income on their rent; and if they do not have enough income to achieve this ratio, then they are excluded from the Affordable Housing Register. Income includes earned income, Child Benefit and Child Tax Credit, but not other benefits.
- 2.17 Applicants are required to pay a deposit of one months' rent in advance and a fee so that Reside can undertake a credit check. Applicants are required to produce passports, confirm immigration status; provide evidence of 3 months' earnings including bank statements, and 3 years' proof of residence. This is not a residential qualification but simply to establish overall bona fides. There is an online application form. Staff allocate properties in line with the policy and undertake viewings and all checks. These checks are in line with current practice in the Private Rented Sector.

3. Proposed changes to the Allocations Policy

- 3.1 The proposed changes to the Allocations Policy are driven by the following objectives:
- To meet our statutory obligations to help those in housing need;
 - To make the best use of the scarce resources available;
 - To ensure that the Council uses its housing stock to assist in meeting the support needs of the community, including those supported by Children's Services and Adult Social Care;
 - To ensure that the housing stock is used effectively to reduce costs.
 - To reinforce the positive characteristics of local people to engage in finding their own solutions to problems and, to become independent and resilient;
- 3.2 This review is being undertaken in part to ensure that these objectives are fully met. The key changes proposed are:
- (1) To change some aspects of who may register with the applicant as a member of their household.
 - (2) To change the arrangements for dealing with cases which are referred to the Housing Options team for assistance from internal and external partners. The proposal is to establish collaborative working between the relevant parties so that vulnerable households can be dealt with in a transparent and well-planned way.
 - (3) To create a smooth pathway that assists older people access the right housing for their housing and support needs

- (4) To give Under Occupiers a higher degree of priority in order to release much needed family housing;
- (5) To ensure that exceptional cases are dealt with in a transparent and equitable way;
- (6) To improve the access to Reside homes, both rented and shared ownership for local working residents on moderate incomes.

3.3 These proposals have been developed following an analysis of current lettings, looking at who has benefited and who has not benefited from our current Allocations Policies. Front line staff in Community Solutions have been invited to indicate how the Allocations Policy is currently working, and where it is either helping and hindering their efforts to assist their clients. Meetings have been held with staff in Care and Support to understand the difficulties that they experience in meeting the housing needs of their clients.

3.4 A review of the Allocations Policies of other London Boroughs has been undertaken, particularly in areas where our Policy is currently silent, or has limited guidance, such as in the allocation of Sheltered Housing.

4. Options Appraisal

4.1 This report sets out a range of possible changes to the current Housing Allocations Policy. The options here are (a) not to change the Policy or (b) to adopt one or more of the proposed changes. These are discussed below.

4.2 Do nothing

There is no absolute requirement to change the Allocations Policy at this time; and changing the Allocations Policy at any time does create work for the operational staff which has to be fitted into the general work programme. It is also good to have stability in the Policy, as applicants and staff do become familiar with the Policy and its operation. However, the disadvantage of not changing the Policy is that it may not deliver the Council's intended outcomes in terms of ensuring that the right people receive the benefit of council housing or Reside Housing in the way that the Council would wish.

In addition, the IT system is being updated and a new online form is being introduced, and it makes sense if the Allocations Policy is being changed, to ensure that the new IT system captures the information required for the operation of the new Policy. This option has therefore been rejected.

4.3 Consult applicants on proposed changes

There are variety of ways in which the Allocations Policy could be changed. The options for change are set out in Appendix 1. These changes are designed to ensure that the Policy more accurately reflects the way in which the Council wants to ensure that Council and Reside homes are allocated. The changes are also to make the decisions that staff make more explicit and transparent.

Allocations Policies are very important as they make decisions that change people's lives and housing opportunities. It is therefore important to refresh them from time to time to ensure that they reflect the latest legislation, regulation, case law and the local

market. For these reasons it is recommended that Cabinet adopt the proposal to consult on the range of changes set out here in Appendix 1.

5. Consultation

- 5.1 Councils are required by law to consult on the changes to housing management under the Housing Act 1996 s105. In addition, Councils must consult housing association partners affected by the Allocations Policy (as nominations to their homes are made by the Council). It is therefore proposed that there should be a 12-week consultation period on the proposed changes if Cabinet approves this; and that a final draft Allocations Policy should be brought back to Cabinet with the results of the consultation process in May 2019.
- 5.2 Consultation will consist of setting out the proposals and seeking comments on each one, in the form of an online form. In addition, applicants on the Housing Register will be contacted and invited to comment. Partners, including Registered Social Landlords and Voluntary Sector organisations will be invited to comment. The Reside Board will also be consulted.

6. Conclusion

- 6.1 These proposals are designed to update our Allocations Policy and bring it in to line with the Council's goals, priorities and approach. Once approved, it will be for Community Solutions to lead the implementation of the policy, in collaboration with other council services (e.g. Care and Support and My Place) and key partners.
- 6.2 Specifically, it is proposed that Community Solutions are commissioned to develop and agree an annual Allocations and Lettings Plan, forecasting its approach to lettings over the next year based on the latest information about supply, demand and the wider strategic approach to meeting the housing and other needs of vulnerable residents. This plan will forecast the number of lettings available each year and set out the target proportions for the different need groups (i.e. decants, homeless households in temporary accommodation, referral groups moving on from supported housing and households on the General Needs Register).
- 6.3 The intention would not be for officers in Community Solutions to be required to hit these forecast levels precisely, but rather to bring greater transparency to the allocations process, to ensure that individual decisions are taken in their wider context, and to allow for greater strategic planning about housing options and pathways for vulnerable residents.
- 6.4 In respect of Reside the Cabinet are requested to agree that all of the relevant legal documents in relation to the Council and Reside are varied to reflect the agreed changes and that the new policy is built into further transfer documents on new schemes. Once these variations are approved, the Reside Board will be responsible for implementing the Allocations Policy in respect of the properties in its portfolio.

7. Financial Implications

Implications completed by: Katherine Heffernan, Group Manager for Service Finance

- 7.1 There are no direct financial implications arising from this report as this report is seeking approval to the housing allocations policy from those affected and relevant partners.

8. Legal Implications

Implications completed by: Martin Hall, Housing Solicitor/Team Leader

- 8.1 The allocation of housing by local housing authorities is regulated by Part 6 of the Housing Act 1996 (HA 1996). A local housing authority (LHA) must comply with the provisions of Part 6 when allocating housing accommodation (section 159(1), HA 1996). However, subject to this compliance, authorities may otherwise allocate housing in any manner they consider appropriate (section 159(7), HA 1996).
- 8.2 Section 166A (1) of the HA 1996 provides that every LHA must have an allocation scheme for determining priorities between qualifying persons. In formulating or amending its allocation scheme, a LHA must have regard to its current homelessness strategy under section 1 of the Homelessness Act 2002. An allocation scheme may be framed to give additional preference to particular descriptions of people (section 166A (5), HA 1996). However, a LHA must not allocate housing accommodation except in accordance with its allocation scheme (section 166A (1), HA 1996).
- 8.3 As a result of changes made by the LA 2011, with effect from 18 June 2012, LHAs have been able to decide who “qualifies” for an allocation. Accommodation can therefore only be allocated to someone who qualifies under those local criteria (section 160ZA (6), HA 1996). Who qualifies is largely a matter for the LHA (section 160ZA (7), HA 1996). The Secretary of State does however have the power to prescribe classes of persons who are, or are not, to be treated as qualifying persons (section 160ZA (8), HA 1996).
- 8.4 Where changes are to be made to an allocation scheme it is a requirement to consult with those affected by the changes (s105 HA 1985), including Registered Providers.

9. Other Implications

9.1 Risk Management

The key risks associated with this project are set out below:

Risk	Mitigation
There is insufficient time to implement the changes for all applicants	Plan for the re-assessment of applicants over a reasonable period; consider bringing in additional resources if required
Risk of legal challenge to the proposed changes	Obtain robust legal advice on the new draft policy before implementation

Expectations on the part of applicants are raised as part of the review; this generates additional enquiries	Ensure that communications with applicants are clear about the level of stock available, and the chances of successful applications
Changes have unforeseen consequences for some applicants, leading to complaints	Test the proposed changes on a variety of case scenarios; carry out a review of the new policy 6 months after implementation.

- 9.2 **Staffing Issues** – The work on consultation required by this report can be carried out within existing resources.
- 9.3 **Corporate Policy and Customer Impact** – A full Equalities Impact Assessment has been undertaken to the proposed changes to the Allocations Policy and is included at Appendix 4. This shows:
- 9.3.1 The proposed changes to the Allocations Policy are generally designed to improve the operation of the process of deciding and allocating homes. Currently a number of decisions are made by officers interpreting the current policy, but often using judgement which is not explicit and publicised. The changes will make the allocation of new homes more transparent and enable applicants to have a better understanding of the process and why they have been successful or not in their efforts to obtain council or affordable housing.
- 9.3.2 The positive impact on groups with protected characteristics have been set out – particularly those that enable households with more modest incomes to access the affordable housing managed by Reside. Vulnerable households such as those with disabilities, mental health issues, or learning disabilities will benefit from a better service generated by improve co-operation between services and discussions at a Panel to ensure that the full range of options for housing are considered for older people.
- 9.3.3 The only potential negative impact is that relating to extended families, where the proposed change to the policy is to define the household that can apply together as three immediate generations – parents, children and grandparents. Households will not be able to register their extended families, such as uncles, aunts, adult brothers and sisters or in-laws on the application. This step is being taken because of the lack of larger properties, and the fact that it is not helpful to these households to register them together for property which is not available. The proposal should ensure that such households have better information about what is available and make better choices about how to seek housing.
- 9.4 **Safeguarding Adults and Children** – The needs of any children in a household are taken into account when assessing applications. The impact on the welfare of children is assessed when developing allocations policies, and any changes to such policies. The proposals to change the arrangements for assessing Children Leaving Care will be improved by the institution of a joint Panel between Community Solutions and Children’s Services. The proposals to change the arrangements for assessing Vulnerable Adults will be improved by the institution of a joint Panel between Community Solutions and Adult Social Care.

9.5 **Health Issues** – Good housing has an important impact on the health of individuals and families. Health issues are taken into account when assessing applications, and priority will be awarded where the current housing that a household lives in, has an adverse impact on their health. Other health issues are also considered such as the need for mobility housing, or adapted properties. There are dedicated staff who ensure that the needs of applicants are understood and ensure that appropriate housing is allocated to those who need it.

9.6 **Crime and Disorder Issues**

The Allocations Policy seeks to support the victims of crime and disorder through specific arrangements for victims of domestic violence and hate crime. In addition, the Council works with the Police and Probation service to ensure that ex-offenders are assisted in their rehabilitation by the provision of a small number of homes so that they can live within the community and retain family links.

Public Background Papers Used in the Preparation of the Report: None

List of appendices:

- Appendix 1: Consultation materials on the changes to the Allocations Policy
- Appendix 2: Draft Shared Ownership Policy
- Appendix 3: Current Allocations Policy
- Appendix 4: Equalities Impact Assessment