

## Appendix 2 - Allocations Policy Review

### Recommendations

	<b>Recommendation</b>	<b>Current Situation</b>	<b>Rationale</b>
1.	Update Policy Objectives	<p>The focus of the current policy's objectives is on reducing void times and helping people choose where they would like to live. Whilst this remains important, going forward there is a need for applicants to make choices based on a growing demand for a smaller number of homes that become available every year in the city.</p> <p>The new objectives focus on helping those in greatest housing need, whilst setting realistic expectations for people, by exploring a range of housing options and in doing so making the best use of housing across the city and ensuring the needs of vulnerable people are met.</p>	Updating the Allocations Policy's objectives helps to ensure all the recommendations put forward as part of this review are consistent in what they are trying to achieve based on what we know the current housing needs are in the City for social housing.
2.	A new banding priority for foster carers and those approved to adopt who require a larger property.	There is no current priority for foster carers and those approved to adopt in the policy.	This supports the achievement of key corporate priorities; assisting children and young people to get the best possible start in life by being able to secure housing that meets their needs more quickly, and also helps to encourage families in the City who are minded to become foster carers or adopter, providing more settled homes to children and young people in care.
3.	Increase the priority given to Wolverhampton Care Leavers and exempt them from any residency requirements up to the age of 25.	Care Leavers are currently given priority at a lesser level than what is recommended in the policy and they are not exempt from the residency rule, which requires them to have lived in the city for at least 2 years.	Supports the Council's commitment to support Care Leavers in having stability in their home lives allowing them to return to the City for example if they move away to attend university.

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4.	Introducing a new band of need called the 'Emergency +' Band.	Currently, the highest Band of need is the Emergency Band. This new band would see a level of need above the current highest priority for applicants with a full homelessness duty who are also care leavers, members of the armed forces, require a substantially adapted property or anyone who requires immediate rehousing due to a significant threat to life.	This new banding is being introduced to ensure those with absolute highest level of need are given the most priority, supporting the Council in meeting its Legal and Corporate responsibilities.
5.	Ensure the limited number of Council housing that becomes available to let is allocated to those most in housing need.	As the policy operates an 'open' housing register, more than half of those registered for housing, having had their circumstances assessed are found to be adequately housed and have no housing need as determined by the policy. Despite this, nearly 10% of housing that became available to let in 2018 were allocated to these Band 4 applicants. Whilst Band 4 applicants were successful in bids for just over 100 properties last year, this only represents 2% of applicants in Band 4. As the vast majority of applicants in Band 4 are unlikely to be housed through the housing register and are better served by looking at other housing options.	Maintaining a housing register only for those applicants in housing need will ensure best use is made of the limited homes that become available. This change will also help to manage expectations as applicants assessed as having no housing need are highly unlikely to be successful in their bid for a house and so will be better served by the Council through better advice and support in accessing other good quality housing options in the City.
6.	Remove the priority attached to a quarter of all properties that become available to let to someone with a local connection to an area over those with the greatest housing need.	Currently a quarter of all lettings are prioritised to applicants that have a local connection to the area in which the property is located. Applicants can choose one area in which they claim a local connection, providing they can provide evidence to show that they meet the local connection criteria.  Properties are randomly selected to be prioritised in this way by an automated process and will be of any property type in any area.	This policy is not consistent with the new objectives of the Allocations Policy in terms of assisting those households in greatest need and by doing so making the best use of Council homes as in the first instance it prioritises local connection above housing need.  This policy is also problematic as the number and types of Council homes are not spread evenly across the City, which could have equality implications for

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			<p>those protected groups in need of specific property types that are in short supply.</p> <p>For those with a need to live in a certain area of the City, this is accommodated as the Allocations Policy is a choice based letting system, and those with the greatest housing need will have the greatest priority including those households that need to move to be able to provide essential care for someone.</p>
7.	<p>The policy recognises that people living in good quality houses of multiple occupation (HMO), are adequately housed and have no housing need on this basis alone.</p>	<p>The current policy gives priority on the housing register to people living in HMOs who are adequately housed with no other housing needs.</p>	<p>HMOs that are well maintained and well managed form part of the wider housing offer in the City. For single people and couples, it can provide an affordable form of accommodation, especially for people in receipt of financial support with their housing costs who are only eligible for the shared room rate, typically single people under the age of 35. The Council with partners is working to ensure all HMOs are of a satisfactory standard and are using its licensing powers to do so, improving standards across the private rented sector as it provides an important housing offer in the City.</p> <p>The policy will maintain priority for families and people of pensionable age living in HMOs.</p>
8.	<p>Allowing applicants to bid and accept an offer of housing if in arrears up to £400.</p>	<p>Currently applicants who owe debts of more than £60 to a Council or Registered Provider, will be placed in Band 4, giving the lowest priority for housing (with a small number of exceptions).</p>	<p>This amount has been increased from £60 to £400 to bring it up to date and in line with the average monthly rent of a Council property, particularly in response to the impact that Universal Credit is having on households</p>

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9.	Allowing a maximum of two refusals of offers of housing in a 12 month period before suspending a housing application for six months.	<p>Whilst the Council operate a choice based lettings system for allocating housing, meaning that the majority of applicants are able to bid on properties and in areas that they choose, there is still a high proportion of applicants that then refuse an offer of housing, for reasons such as location or property type.</p> <p>Applicants (excluding those owed a homeless duty), currently can refuse three offers of suitable accommodation in a 12-month period before their application is suspended for a period of three months.</p>	Despite Wolverhampton Homes and the tenant management organisations providing as much information on the property in the advert, applicants are bidding on properties that they are not willing to accept offers of housing on. This is a waste of resources and can increase the length of time a property remains empty, meaning higher void costs. Reducing the number of refusals that can be made and increasing the amount of time an applicant cannot bid, should encourage applicants to fully consider if they are willing to live in the property they are bidding on, their housing options and have realistic expectations about where and what homes are likely to become available to let. It should also make the best use of housing by reducing the time a property remains empty.
10.	Improve access to ground floor flats for those applicants with mobility restrictions.	Ground floor flats are currently prioritised for applicants who are over 55 years old and applicants requiring single level accommodation.	There is limited single level accommodation across the City that is accessible to people with mobility restrictions. In line with making the best use of homes available and meeting peoples housing needs, this change aims to improve accessibility to homes and potentially reduce the waiting times of those people of all ages, including older people, with limited choice on where they can live because of mobility restrictions.
11.	Allow children of the same sex to share a bedroom post the age of 15.	When children of the same sex reach the age of 15 they require separate bedrooms, in terms of their housing application.	Increasing the size of property that a family needs, when two same sex siblings would be happy to continue to share, can restrict the household's eligibility to larger homes that are in short supply and can significantly increase the amount of time they may be waiting on the housing register.

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12.	Improve the powers of Multi-Agency Panels to award a wider range of housing priority when assessing the needs of individual cases.	Currently multi-agency panels which could for example include Social Care, the Police, Probation and the NHS can only provide an Emergency banding to an applicant's housing application, when there circumstances have been considered as part of a case conference style discussion in terms of the support required to address the individual needs of the applicant/household.	Some applicants who receive support from various organisations may benefit from an increased level of priority as part of a package of support, but do not require an urgent need to move, equivalent to an Emergency Band award.
13.	Applicants owed a housing duty that are refusing to cooperate with Housing Options will be placed in Band 3.	Housing options can only award banding for homelessness duties, there is no repercussion for refusing to engage with support services.	Encourages applicants to cooperate with housing options and resolve their housing need.
14.	Improve the Council's ability to protect applicants or other residents by restricting the property type or location where an applicant can bid if they would otherwise pose a risk to themselves or others.	Currently applicants can only be excluded from the housing register as a whole but there are circumstances where it is in the best interest of the applicant or other residents if the applicant is limited to where they can bid for housing based upon location or property type.	For example, this approach could provide further protection to victims of Domestic Violence by excluding the perpetrator from bidding on properties close to the victim. It could also prevent some vulnerable people from bidding on the higher floors of high-rise flats where for example it may be difficult for them to escape in the case of a fire. Decisions to make these exclusions would be taken on a case by case basis, with the provision of supporting evidence from partners.
15.	Increasing the priority of overcrowded families living in one-bedroom properties.	Currently over occupied families in one bedroom properties have no additional priority when compared to families over occupied in a two bedroom property.	This improves the priority for parents that are sharing with children, above priority for those parents and children that have separate bedrooms.
16.	Households that are overcrowded will receive higher priority than families that are not overcrowded but	Currently applicants that are tenants of the Council or a registered provider (housing association) who has children under 12 years of age but does not have access to a private garden is awarded Band 2 priority,	Whilst recognising the benefits of a private garden for families with children under the age of 12, this has been balanced with addressing the housing needs of those families living in overcrowded conditions.

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	have no access to a private garden.	greater than the Band 3 priority received by overcrowded households short of one bedroom.	
17.	Allow the largest families that are overcrowded to improve their housing situation by moving to a property where they may still over-occupy but to a lesser extent than before. This would be on a case by case basis with the approval of a senior Council housing officer.	Currently families who require 6 or 7 bedroom properties are unable to bid on 4 5-bedroom properties despite the lack of 6 or 7 bed properties in the City as they would still be classed as overcrowded.	This will help to alleviate the situation for households that are extremely overcrowded, reducing the amount of time they will have to wait for a property to become available, if at all due to the shortage of larger homes in the City.
18.	Ensure the Allocations policy meets current needs by removing those criteria that are not used i.e “the two tenancies for one rule”	The “two tenancies for one rule” gives additional preference when two Council or Registered Provider (housing association) tenants are each giving up a property type that is in demand (determined by analysis of the number of bids and availability of type of property) to move into one property.	This additional priority has been in the policy for a number of years, however has very rarely been used and so has been considered as not meeting current housing needs.
19.	Allow households in the Emergency band, to bid and accept offers of housing despite factors that would otherwise reduce their priority to the lowest Band in the policy.	Applicants that have been assessed as in the greatest housing need (Emergency Band) are currently placed in Band 4 (lowest priority for housing) due to factors such as having £60 rent arrears unless there is a statutory duty to house them.	As applicants awarded the Emergency band have been assessed as having an urgent need to move, this priority should be honoured with additional support or agreements put in place to overcome the reasons for being placed in Band 4, for example a payment plan for those applicants in arrears. This does not apply to applicants in the Emergency Plus or Emergency Bands.
20.	Applicants assessed as having lesser preference would have their application suspended until the affected criteria has been resolved or	There are currently circumstances where an applicant’s housing need is assessed but they are awarded ‘lesser preference’ and placed into the Band 4, the least priority for housing. Examples include having debt over £400, having failed a pre-leaving	As Band 4 is being removed and to encourage applicants to not enter a new tenancy continuing the same unacceptable behaviour, applicants with lesser preference will now have their application suspended until the affected criteria has been resolved or a

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	a repayment plan has been adhered to for at least 3 months.	inspection and where they have been involved in unacceptable behaviour such as anti-social behaviour.	repayment plan has been adhered to for at least 3 months.
21.	Extend the preference of 10% of properties to lower bands (Band 2 and 3) to include Band 1.	Preference is currently given to applicants in Band 2 and Band 3 for 10% of all lettings made to ensure that applicants with this level of housing need have an opportunity to receive an offer of accommodation.	With the introduction of the Emergency Band + and removal of Band 4, this 10% is to be extended to include applicants in Band 1 to make more consistent and fairer the opportunity to access housing for those in greater housing need. This will see 5% of properties allocated to Band 1 and another 5% allocated to Band 2 and 3.
22.	Removal of the requirement for updated medical evidence to be provided every 6 months.	The policy requires applicants to provide medical evidence every 6 months, however medical professionals now charge patients for medical evidence.	The requirement for updated evidence every 6 months has been removed from the policy.
23.	Amend the 'residency rule', which requires applicants to have lived in the City for 2 or more years before their housing needs can be fully assessed, to exclude refugees and travellers.	Applicants who have not lived in the City for at least two years are awarded the lowest priority of housing need, Band 4 with a small number of exceptions for example there is an emergency or band 1 need to move on medical or social grounds or the applicant or a member of the household has a firm offer of employment in the City.	This change takes into account recent case law, which assessed the inclusion of refugees and Gypsy and Travellers in residency requirements as equal to indirect discrimination, as it would be more difficult for refugees and Gypsy and Travellers to meet this requirement than others.
24.	Direct allocation of properties brought back in to the Council's stock, typically for purposes of regeneration and renewal, to the existing occupant of the property.	Should the Council need to buy a property into its stock, typically a former Right to Buy property for a large-scale renewal programme, the occupant would need to be rehoused under the existing Allocations Policy.	The current policy will reserve the right to directly allocate properties which have been purchased in cases of for example estate regeneration, where this has been subject to separate Cabinet approval as part of that project.
25.	Reserve the right of the Council to allocate available properties outside of the	There is currently no mechanism within the policy that allows a flexible response from the Council in terms of the use of available housing in the case of a large-scale emergency.	This adds to the City's resilience plans should a large number of households in the City require urgent rehousing due to an emergency situation.

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	Allocations in the case of a large-scale City emergency		
26.	Remove the option of automated telephone bidding.	Currently bids for available properties can be made via the website, by text, via automated phone line, in person at a Housing Office or by phone	The automated telephone bidding service is a rarely used service accounting for 0.5% bids.
27.	Recommendation to undertake further research into the development of an Accessible Housing Register for the City.	Applicants who require an adapted property are encouraged to bid on any property they are eligible for with an Occupational Therapist assessment done if the applicant is successful in their bid, which can result in the property not being suitable for the type of adaptation required. Not enough information is known about the stock in terms of adaptability for a number of needs.	The experience for applicants requiring an adapted property could be improved if we have better information across the stock in terms of how it can be adapted. This would allow us to make best use of Council homes and better meet housing need of those applicants that require an adapted property.