

NOTTINGHAM CITY HOMES

HOUSING MANAGEMENT SERVICES COMMITTEE

REPORT OF HOUSING REGISTRATION AND ALLOCATIONS MANAGER

17 NOVEMBER 2009

REVIEW OF THE ALLOCATIONS POLICY AND THE FUTURE OF THE ALLOCATIONS SERVICE

1 SUMMARY

- 1.1 The purpose of this report is to update the Housing Services Committee on the progress with regard to the Allocations Policy Review and to inform members on future developments to the service with regard to the CBL re-implementation project and Nottingham City Homes' bid to provide a Sub Regional CBL allocations service.

2 RECOMMENDATIONS

- 2.1 It is recommended that the Housing Management Services Committee note the report.

3 Allocations Policy Review

3.1 Background

In 2008 as part of its work for the Overview and Scrutiny Committee the City Council and Nottingham City Homes, on behalf of the HomeLink Partnership, began a review of the allocations policy.

The review has included:-

- Consultation with tenants, applicants, employees, elected members and key stakeholders.
- The national and local strategic context, legal framework, government guidance on social allocations (in particular the most recent guidance "fair and flexible") and local strategies that aim at place shaping and the creation of strong sustainable communities.
- A detailed analysis, carried out by Nottingham City Homes, with regard to the Housing Register and the outcomes and implications of the present policy.

In August 2009 Nottingham City Homes concluded the review and presented the findings and recommendations for amendments to the policy and operational practices to Nottingham City (Appendix 1 – A

Report on the Allocations Strategy for Nottingham City).

3.2 Supply and Demand

The review highlighted that there is a supply and demand issue within Nottingham City, i.e.

- A shortage of family type accommodation, in particular 2 bedroom and 4+ bedroom houses compared to the demand from applicants on the Housing Register who need this type of accommodation.
- An increase in under-occupation
- Very low or no demand for sheltered accommodation
- There is a reasonable supply of 1 bedroom accommodation.

The review has taken into account that the City aims to transform neighbourhoods and improve the quality and mix of housing through strategic regeneration. This will create further pressure on the Housing Register as regeneration is introduced and tenants may need to be re-housed.

The policy recommendations (listed below), therefore, are proposed to address these issues, via a more stringent occupancy criteria, prioritising applicants who are releasing high demand accommodation and removing quota systems in order that those in the greatest need are considered first.

3.3 National, Legal and Local Context

The Allocations Policy must comply with the requirements of Part 6 of the Housing Act 1996, as amended by the Homelessness Act 2002. The most recent guidance “Fair and Flexible” reaffirms the Government’s commitment to giving priority to those in the greatest need whilst recognising the need for local authorities to meet local pressures.

The proposed amendments aim to provide a policy which meets the statutory housing need requirements whilst also addressing local pressures and contributing to the development of balanced and sustainable communities.

The removal of the quota system, for example takes into account Government guidance for a needs led service, whilst the introduction of increased priority for those applicants vacating high demand accommodation proposes to address local pressures of supply and demand.

Other local pressures are addressed within both the policy and operational recommendations, for example the introduction of a separate neighbourhood re-generation list which will address the need to deal

quickly with those residents who need to be rehoused as part of a Council regeneration scheme.

3.4 Support

During the review particular attention has been placed on equality and diversity. Consideration has been given to whether we are meeting the support needs of our customers, in addition to ensuring that the policy is fair, transparent and easy to understand.

In common with many other areas in the UK, allocations schemes whether they are traditional or choice based lettings schemes, may result in there being customers who are potentially disadvantaged. There is a perception that choice based lettings increases the risk of disadvantage and limits access. The recent statutory guidance “Fair and Flexible” highlights the need for local authorities to revise their policies and if necessary replace them with a system that is better understood. This requires local authorities to effectively communicate policies and ensure that they are understood.

The recommendations aim to minimise discretion within the policy providing an open and transparent policy written in such a way which is easy for customers and staff to understand.

From the outset of Nottingham HomeLink, emphasis has been placed on ensuring support is provided for vulnerable applicants through an annually reviewed Inclusion Strategy and inclusion programme. However, an emerging issue from the consultation suggests there is a requirement to further increase the support provision and to consider how the current support mechanisms can be further developed to respond to the potential volume and complexity of support required. Recommendations have also been made to operational practices to address these issues.

3.5 Recommendations

The following policy and operational recommendations have been made as a result of the review:

3.5.1 Policy Recommendations

Recommendation 1 (R1): Revise occupancy criteria

Revise occupancy criteria based on need in order to ensure applicants are better matched to type and size of property. This will enable stock to be utilised more effectively.

Recommendation 2 (R2): Pregnant applicants (with no other children) to be considered as a family with 1 child

Pregnant applicants (with no other children) to be eligible for 2 bedroom

accommodation at ground level and not 1 bedroom accommodation.

Recommendation 3 (R3): Introduce urgent need priority (band 2) for tenants under-occupying

Give priority to social housing tenants who are under occupying high demand 2 or more bedroom properties.

Recommendation 4 (R4): Place families in high rise and low rise flats in the same band (band 3)

Remove the discrepancy of families in high rise flats receiving urgent need priority compared to families living in low rise flats.

Recommendation 5 (R5): Introduce an urgent need priority (Band 2) for families living in 1 bed accommodation with more than 1 child.

Addresses the more urgent need to move for larger families living in 1 bed flats.

Recommendation 6 (R6): Removal of Quota System

With demand for accommodation being high it is recommend that all properties are firstly made available to people in one of the reasonable preference groups (Bands 1 and 2). If the quota system is removed this will allow those in greatest need to have first opportunity for available properties.

Please note the removal of the quota system will be closely monitored to ensure objectives are being met without a negative impact on other local strategies.

It is also recommended that RSLs adopt the same approach as NCH and make available properties to those in greatest need first and that this is monitored through the HomeLink Partnership Agreement.

Recommendation 7 (R7): Time restrictions to be introduced for band 2 applicants

At the end of a 6 month period each case will be reviewed and only those exceptional cases, where there have been no opportunities to bid, will be allowed to remain in band 2. If the review identifies there is still an urgent need to move, one manual offer will be made of a property suitable in terms of size and facilities for the applicant's needs. If the offer is refused, the applicant will be removed from band 2.

We recommended phasing of time restrictions for medical applicants until historical cases are cleared.

Recommendation 8 (R8): Introduce an urgent need category for

families being moved under the Family Intervention Project.

This will apply to those FIP cases where families need to be moved urgently in order for the support to be successful.

Recommendation 9 (R9): Introduce a new urgent need category for

- Those with the right to have a statutory succession to a tenancy but no reasonable rights to occupy the property of the deceased tenant (for example where under occupation will occur), Each case will be assessed on its merit in accordance with case law (Bracknell Forest Council versus Green and Green, 2009); and
- Non-statutory succession cases where there are no rights to succeed but based on agreed criteria it is reasonable to rehouse an occupant to more suitable accommodation, thereby making best use of stock.

Recommendation 10 (R10): Introduce urgent priority to social housing tenants who are able to relinquish a property with adaptations.

Recommendation 11 (R11): Minimise discretion within the management recommendation process

Introduce a set criteria for the following cases:- statutory successions to tenancies with no right to occupy property, non-statutory successions to be rehoused to more suitable accommodation, non violent relationship breakdowns and joint to sole tenancies. These cases to be monitored through current monitoring and scrutiny arrangements.

Recommendation 12 (R12): Introduce an agreed assessment by Housing Aid, under the local authority's homelessness duty

This will be in relation to NCC/NCH tenants who are under serious threat and immediate risk of harm/death, and who need to move immediately, to be dealt with through band 1.

Recommendation 13 (R13): Extend the urgent need category for applicants experiencing domestic violence to non tenants.

An assessment process will be developed in partnership with Housing Aid

Recommendation 14 (R14) Implement new exception to Local Connection requirement for those people fleeing domestic violence

Applicants fleeing domestic violence who are accepted as homeless do not need a local connection. This recommendation therefore demonstrates consistency in dealing with similar cases.

Recommendation 15 (R15): Extend the existing management

recommendation priority for those fleeing violence to include referrals from the National Witness Mobility Service.

Recommendation 16 (R16): Remove band 6

Incorporate applicants into the appropriate bands according to their circumstances but where local connection will still apply.

Recommendation 17 (R17): Award band 2 for tied tenants

Recommendation 18 (R18): Remove Tenancy Time Restriction currently applied to Council Tenants.

This will ensure the consistent application of policy for both NCC/NCH and partner RSL tenants.

3.5.2 Operational Recommendations

Recommendation 1 (Operational): Develop a more comprehensive housing options advice service.

In view of high demand for social rented tenancies, other housing options will be explored with individual applicants.

Recommendation 2 (Operational): Develop support provision to meet existing and future complex needs.

Consultation has highlighted the potential complexity of need particularly for vulnerable individuals. An understanding of these current and future needs is essential in order to develop the appropriate support provision.

Recommendation 3 (Operational): Increase casework for young applicants pre and post tenancy.

The objective is to assist young people to access support and to gain independent living skills before they are offered a tenancy and subsequently be supported and equipped to sustain their new tenancy.

Recommendation 4 (Operational): Increase the casework system.

Extending the current one to one casework system to more applicants for example families living in flats will ensure non-bidding is monitored and appropriate support and housing options advice is given.

Recommendation 5 (Operational): Increase methods of communication and access for BME groups to housing and sheltered accommodation, including encouraging and supporting households across traditional boundaries.

Recommendation 6 (Operational): Work with Scheme Managers to better promote availability of sheltered schemes and the services

they provide.

Recommendation 7 (Operational): Review the medical assessment roles and procedures currently in place and compare the service with peer and good practice organisations.

Recommendation 8 (Operational): Introduce a separate neighbourhood regeneration list within the allocations policy.

This will seek to address the need to deal quickly with those residents who may have to be rehoused as part of a Council regeneration scheme, whilst identifying its impact upon other high priority applicants.

Recommendation 9 (Operational): Develop an agreed criteria and review process for managing local and sensitive lettings policies

This will involve equality impact assessments, setting clear objectives in partnership with customers, other landlords, agencies and other key stakeholders, to be reviewed within a set time period. The system will allow analysis and assessment of the area impact looking at demographics of areas. A programme of reviews of all existing local and sensitive lettings policies carried out within an agreed timescale will be undertaken.

Recommendation 10 (Operational): Work with NCC on the CLG over-crowding and under-occupation pathfinder initiative

NCC has successfully bid for funding under the “pathfinder” initiative which will be used to tackle over-crowding. The project will include housing options advice to tenants under-occupying accommodation and to applicants who are living in over-crowded accommodation.

3.6 **Next Steps:**

The recommendations have been incorporated into the Allocations Policy (**See appendix 2 for draft policy**) which has subsequently been sent to key stakeholders and customers for feedback. The feedback which has been received to date has been, in the main, positive with the recommendations being welcomed as an improvement to the allocations policy. There are clear benefits to the customers in relation to transparency, ease of understanding and fairness, whilst also meeting local and national strategic obligations and demands.

Alan Clarke, Portfolio Holder, Neighbourhood Regeneration and Dave Liversidge, Portfolio Holder, Housing Delivery, have been specifically consulted via the Housing Forum. Their feedback and recommendations have been incorporated into the draft policy. Further consultation with Elected members will take place at a member’s seminar on 11th November 2009.

Following the members seminar final amendments will be incorporated

into the draft policy, which will then be formally submitted to the Nottingham City Executive Board for approval.

Once the policy has been approved, a 6 month implementation period will be necessary in order to:-

- Build/Incorporate IT amendments.
- Amend all relevant documentation.
- Train members of staff.
- Inform applicants.
- Publicise the new policy.

A re-implementation plan will be drawn up for this purpose.

4 CBL Re- Implementation

4.1 Background

As part of the Allocations Policy Review, Nottingham City Homes has also undertaken a review of the current Allocations IT systems. A staff user group initially reviewed the current IT systems and it was perceived, that the systems could be improved to better meet the business needs of NCH.

As a result an independent organisation (NCC Group) was commissioned to undertake a review and make recommendations for improvements. Recommendations were made to deliver a re-implementation of the Northgate housing modules; to implement the business process changes; and to ensure staff undertaking the work have the right level of training and support to carry out their roles.

Whilst it has been possible to proceed with some of the recommendations, as listed below, the majority of the improvements recommended within the re-implementation exercise cannot be completed until the Allocation Policy Review is completed and the revised Policy implemented.

4.2 Tasks completed under the CBL reimplementation project include:

- Improved security level access – minimising errors, improving consistency and accuracy of amendments to applications.
- A review and updating of application data carried out via a thorough review and re-assessment of all applications on the Housing Register.
- Implementation of an improved and robust annual review process and procedures.
- Improvements to text and the automated letter production process for offer letters and review letters.

- Increased speed to view properties on the HomeLink website.
- Testing and upgrading to updated version of Northgate (V5.15.1)
- Improved connectivity for RSL HomeLink partners.
- Introduction of new processes, support and assistance for referral of IT problems for RSL HomeLink partners.
- Improved IT systems in relation to collection of diversity information (expanded mandatory fields for all 6 strands of diversity)
- Undertaking of site visits to other Northgate users in order to ensure best configuration of Northgate systems.
- Amendments to IT systems to accommodate interim amendments to the Allocation Policy (families in high rise)
- Programme of training implemented for RSL partners.

4.3 **Next Steps**

A project manager has been employed to complete the CBL re-implementation project. Appendix 3 gives an initial list of key activities within the Allocations Service which are to be completed under the CBL re-implementation exercise, Allocation Policy Review. These include activities which will take place if we are successful in our bid to host a sub regional scheme. At this time it is only possible to give an indication of the time line for these actions. A detailed project plan with specific target dates is currently being produced.

5 **Sub Regional Choice Based Lettings**

5.1 As part of the improvements to the Allocations Service and in our objective to provide an excellent housing service, Nottingham City Homes has made a bid to host a sub-regional choice based lettings scheme on behalf of three neighbouring Boroughs, i.e. Broxtowe, Gedling and Rushcliffe

5.2 **Background**

In October 2007 a partnership between the Rushcliffe, Gedling and Broxtowe Borough Council's submitted a bid and were successful in obtaining funding from the CLG to deliver a sub regional CBL scheme. Prior to the bid being submitted, the partnership had advised Nottingham City of their intention to join the established HomeLink scheme rather than develop their own, because of Nottingham City's track record for delivering a successful CBL scheme,. The Services Director at the City had, therefore, gained approval from the portfolio holder to enter into a formal partnership to develop a sub regional CBL scheme.

In August 2009, due to procurement obligations NCC/ NCH were invited to submit a tender bid to host the CBL scheme on behalf of the partnership. That bid was submitted on the 23rd September 2009 with a presentation of the system to the Partners on the 12th October 2009. A decision on the bid is expected in early November 2009.

5.3 The case for expanding HomeLink to the neighbouring boroughs includes:

- Government policy that all local authorities should be operating Choice Based Lettings by 2010 and CLG want to see Choice Based Lettings operating across LA boundaries in sub regional or regional schemes, as encouraged by the white paper “Stronger and Prosperous Communities” and far more cross boundary working.
- The Housing Market Assessment for the Nottingham ‘core’ area comprising of the City, Gedling, Broxtowe, Rushcliffe, Erewash and the Hucknall part of Ashfield. This covers approximately 80% of the Nottingham housing market and essentially seeks to co-ordinate investment and regeneration strategies.
- Homes and Community Agency single conversation about a place-based approach to sustainable housing and regeneration, people, communities and places. Better identifying and informing strategies and partnerships for local areas.

5.4 **How will it work?**

Nottingham City Homes will host the scheme which includes maintenance of the housing register, advertising properties, maintaining the website, providing the IT software for the scheme, provision of support and training to the partners in addition to monitoring and performance reporting.

Each of the Boroughs will have its own Allocation Policy which will be separate from the NCC Policy. Whilst there will be many similarities between the policies, each policy will have its own requirements which will ensure successful applicants have a local connection to their parent local authority.

Each local authority will also have its own Housing Register, and whilst these will be co-located within the HomeLink IT system they will be distinct from each other.

Application forms for all schemes will be in a common format to ease aid of input, but each of the Boroughs will have their own branded application forms. It must be recognised that as is the case now, some applicants are entitled and indeed do register with more than one local authority area because they have local connections with those authorities. The sub regional system will assist those applicants who have multiple local connections as the completion of one form will enable

them to register with more than one local authority if they fulfil the eligibility criteria.

Support and advice to applicants will primarily be the responsibility of each local authority but Nottingham City Homes will advise and assist in this respect.

Each Local Authority will do its own short listing from the successful bids made by applicants. In essence this means that for all vacancies within the City, NCH will continue to shortlist and select applicants for properties, in accordance with the NCC Allocations Policy. The sub regional CBL system will have no impact on the way NCH allocates NCC properties.

Void properties for the three Boroughs will be advertised as part of the general HomeLink advert, however each Borough will have their own section within the advert. The Borough properties will be clearly distinguishable with their own headings and colour scheme making it clear who can bid for what properties.

It should be noted that the issue of local authority boundaries was raised prior to the original bid from the partnership being submitted, as it was considered that all authorities may have political sensitivities. However it was considered that strict local connection criteria could be put into place, allowing each local authority to only make offers to applicants who have a local connection to the particular borough, as a possible solution to these concerns. A 5-10% mobility between local authority areas was also discussed and the bid was submitted with the intention of 5% mobility between the boroughs. This does not however, include Nottingham City Homes properties.

6 FINANCIAL AND RISK IMPLICATIONS (DOF010)

- 6.1 NCH is currently negotiating with the City with regard to costs which will be incurred to implement the revised policy.
- 6.2 Costs incurred as a result of the CBL re-implementation project will subsequently result in savings in the future and therefore this is in line with the “invest to save” strategy.
- 6.2 Hosting a sub-regional scheme does mean new business for NCH and potential income.

7 IMPLICATIONS FOR NOTTINGHAM CITY HOMES OBJECTIVES

- 7.1 The improvements to our service delivery as a result of the Allocations Policy Review and CBL re-implementation will help us to achieve excellent services. In addition hosting a sub-regional choice based lettings scheme will comply with Government drivers and will again help us to achieve excellent status.

8 VALUE FOR MONEY AND EFFICIENCY ISSUES

- 8.1 The CBL re-implementation project will achieve cost and staffing resource efficiencies for the Allocations Service.
- 8.2 Hosting a Sub Regional CBL scheme will mean new business for the company along with economies of scale efficiencies.

9 EQUALITY AND DIVERSITY IMPLICATIONS

- 9.1 The Allocation Policy Review has placed great emphasis on equalities and diversity. This is detailed in the attached report "A report on the Allocations Strategy for Nottingham City".

10 BACKGROUND MATERIAL AND PUBLISHED DOCUMENTS REFERRED TO IN COMPILING THIS REPORT

Fair and Flexible – Draft statutory guidance on social housing allocations for local authorities in England - 31st July 2009

Contact officers: Sue Lomax
Registration & Allocations Manager
14 Hounds Gate
Nottingham
NG1 7BA
Tel: 9157138
E-mail: sue.lomax@nottinghamcityhomes.org.uk

Date: 2 November 2009