

## DECISION ITEM

REPORT OF	MEETING	DATE	ITEM NO
DEVELOPMENT SERVICES DIRECTORATE	ENVIRONMENT, HEALTH AND HOUSING COMMITTEE	5 JUNE 2018	7

### MY HOME CHOICE FYLDE COAST REVISED CONSISTENT ASSESSMENT POLICY

#### PUBLIC ITEM

This item is for consideration in the public part of the meeting.

#### SUMMARY

MyHomeChoice is the Choice Based lettings (CBL) system across the Fylde Coast authorities of Blackpool, Fylde and Wyre. It provide a portal where all vacancies for social housing are advertised in one place and households can placed bids for this accommodation. Properties are then allocated using a Consistent Assessment Policy for prioritising the housing need of applicants.

A review was undertaken of MyHomeChoice in 2015/16 which focussed on addressing issues of concern with the current Consistent Assessment Policy (CAP) raised by Registered Providers. The last such review of the Choice Based lettings Scheme (CBL) was undertaken in 2013, following the introduction of the Localism Act 2011. A number of changes were proposed to the current Consistent Assessment Policy to help alleviate delays in the current system for applicants, by bringing in an element of flexibility in ways households can access affordable housing.

The proposed changes have undergone a consultation period. As part of the consultation process Fylde BC Environment, Health and Housing committee were updated on the 7<sup>th</sup> November 2017 on the proposed changes and it was recommended a working group be established to submit a consultation response and review the findings of the wider consultation exercise, in order for further consideration and approval of the proposed changes by this committee.

#### RECOMMENDATIONS

1. Note the contents of the report on the review of MyHomeChoice CAP, the information provided to the Working Group and the outcome of the consultation process regarding proposed changes to the CAP.
2. Approve the proposed changes to the Consistent Assessment Policy and recommend the policy be updated and implemented by Fylde Coast Housing Providers.
3. A further update on the working of the Consistent Assessment Policy of MHC within Fylde be provided to this committee in 1 years' time that refreshes information provided in Appendices 1, 3, 4 and 5.

#### SUMMARY OF PREVIOUS DECISIONS

##### Cabinet - 18th November 2009

1. To commit to the detailed development of the CBL scheme based on the principles outlined in this report.
2. To approve the apportionment of costs, with FBC's costs to be funded by virement from within existing budgetary provision
3. To support consultation on the adoption of a new allocation scheme for Fylde borough that will comprise a borough-specific lettings plan and a Fylde Coast Consistent Assessment Policy as outlined in Appendix 1 of the report.

4. To ensure that the final CBL system and associated allocation scheme is presented to a future meeting of Cabinet for approval prior to its introduction.

#### Cabinet - 16<sup>th</sup> February 2011

1. To recommend approval of a new Allocation Scheme for the Council which will set out who will get priority in the letting of affordable housing in the Borough. The Allocation Scheme to comprise a borough-specific Area Lettings Plan and a Fylde Coast Consistent Assessment Policy.
2. To recommend approval of the process to establish a Partnership Agreement that sets out the responsibilities of the nine partners in establishing and operating a proposed new Fylde Coast CBL system.
3. To recommend that project costs should be approved and that the council should enter into a contract with an IT provider for the new CBL system that will be operated by the principal social housing providers across Fylde, Blackpool and Wyre.

Policy Development Scrutiny Committee in 2013 considered changes as a result of the introduction of the Localism Act 2011 and consultation responses as follows:

#### Policy Development Scrutiny Committee - 10<sup>th</sup> January 2013

1. To note the review of the allocation policy and to welcome the report of the consultation responses to a future meeting
2. To recommend that the Council approves the draft Fylde Coast Tenancy Strategy
3. To note the new power in the Localism Act 2011 that enables Local Authorities to discharge their homelessness duty using the private rented sector

#### Policy Development Scrutiny Committee - 23<sup>rd</sup> May 2013

1. The consultation results be noted
2. To recommend that Cabinet adopt the draft Housing Allocation Policy
3. To recommend that Cabinet approve the Fylde Coast Tenancy Strategy

#### Cabinet - 26<sup>th</sup> June 2013

Resolved to approve the recommendations made by the Policy Scrutiny Committee 23<sup>rd</sup> May 2013.

1. The consultation results be noted
2. To recommend that Cabinet adopt the draft Housing Allocation Policy
3. To recommend that Cabinet approve the Fylde Coast Tenancy Strategy

#### Environmental Health and Housing – 7<sup>th</sup> November 2017

The committee RESOLVED to

1. Note the contents of the report on the consultation related to proposed changes to the Consistent Assessment Policy (Allocations Policy) for MyHomeChoice Fylde Coast;
2. That the Chair and Vice Chair of the Committee, and Councillor Oades, establish a working group with the Housing services Manager to submit a formal consultation;
3. That all councillors are requested to provide responses to the consultation by the end of November 2017, should they wish prior to the working groups, and;
4. The Fylde Coast Housing Providers group consider all responses received from across the Fylde Coast and provide a revised Consistent Assessment Policy for MyHomeChoice Fylde Coast for further consideration and approval by committee.

### CORPORATE PRIORITIES

Spending your money in the most efficient way to achieve excellent services ( <b>Value for Money</b> )	✓
Delivering the services that customers expect of an excellent council ( <b>Clean and Green</b> )	✓
Working with all partners ( <b>Vibrant Economy</b> )	✓
To make sure Fylde continues to be one of the most desirable places to live ( <b>A Great Place to Live</b> )	✓
Promoting Fylde as a great destination to visit ( <b>A Great Place to Visit</b> )	✓

## **REPORT**

1. A review was undertaken of MyHomeChoice in 2015/16 which focussed on addressing issues of concern with the current Consistent Assessment Policy (CAP) raised by Registered Providers;

(A doc link is available to the current CAP in Background Documents)

- a. The system needs to enable Providers to find tenants for properties promptly and avoid unacceptably high re-let times
  - b. It was felt the system needs to have a more flexible commercial approach to attract more households who would not necessarily have thought they would be eligible for social housing
  - c. Concerns regarding difficult to let properties exacerbated by the introduction of the Spare Room Subsidy for Housing Benefit purposes
  - d. Concern the CAP and Area Lettings Policies may have exacerbated this situation especially with the exclusion of people from the register who have broken their three year continuous residency in one borough and were unable to join the register, yet had only moved from one borough to another
  - e. Delays in processing of applications as all applicants have to go through a full registration process and be awarded no priority for re-housing
  - f. Many households who have gone through this process do not bid regularly, or are lost to the private rented sector
2. The last such review of the Choice Based lettings Scheme (CBL) was undertaken in 2013, following the introduction of the Localism Act 2011.
  3. A number of changes were proposed to the current Consistent Assessment Policy to help alleviate delays in the current system for applicants, by bringing in an element of flexibility in ways households can access affordable housing.
  4. As part of the consultation process Fylde BC Environment, Health and Housing committee were updated on the 7<sup>th</sup> November 2017 on the proposed changes and it was recommended a working group be established to submit a consultation response and review the findings of the wider consultation exercise, in order for further consideration and approval of the proposed changes.
  5. The Working Group met on the 13<sup>th</sup> December 2017 to consider a consultation response to the proposed revision to the Consistent Assessment Policy, and on the 24<sup>th</sup> April 2018, to go through the consultation responses received and discuss the subsequent report for Environment Health and Housing Committee on the 5<sup>th</sup> June 2018.

### **Consultation response December 2017**

6. Appendix 1 contains the analysis of MyHomeChoice Fylde Coast from 2015 to 2017 that was circulated at the first meeting to inform the consultation response. In summary the register has seen an increase in applicants looking for social housing, both existing social tenants wishing to transfer and new applicants looking for social rented accommodation. The majority of these households needing to move are within the private rented sector and we are seeing an increase in households living with friends or relatives and in tied accommodation. There is continuing high demand for one and two bedroom accommodation across the borough with strong demand for three and four bedroom accommodation.
7. A doc link to housing circumstances that currently reflect priority need bandings is contained in Background Papers, My Guide to Applying for a Home. During the period 1% of all households registered with a local connection to Fylde were awarded Band A priority for re-housing; 11% Band B priority; 16% combined bands C and D priority; 21% Band E priority; and, 51% Band F priority. Within Fylde approximately 35% of households wishing to move are in employment or undertaking voluntary work and the majority of households registered for re-housing are within working age 26 to 59.
8. The Working Group prepared the consultation response provided in Appendix 2, (referred to in this report as the EHH response) and this was circulated to all Councillors.

9. The consultation on the proposed changes to the MyHomeChoice Fylde Coast policy and system took place between 8<sup>th</sup> November 2017 and 18<sup>th</sup> December 2017.

#### **Review of Consultation April 2018**

10. At the second meeting of the Working Group consideration was given to a report on the summary of consultation responses and the proposed changes to MyHomeChoice allocations policy and lettings system. This report can be found in Appendix 6.
11. To inform the Working Group the following evidence was provided.
- a. An analysis on the allocation of properties to households without a local connection to Fylde through MyHomeChoice Fylde Coast. This report is contained in Appendix 3. This concluded:
    - Over the two year period from 01/04/2016 to 29/03/2018 a total of 351 properties were let through MyHomeChoice.
    - Of these 69 properties or 18% were let over the two year period to households without a local connection to Fylde.
    - This equates to 9% of properties per annum within Fylde being let to households with a local connection to a neighbouring authority.
    - The majority of these lets, 39%, were to households requiring sheltered accommodation when properties had been void for on average 6 weeks.
    - 30% of these lets were to households with a priority banding for re-housing (A to D) and 9% to households with no priority banding (F). In these cases the vacant properties had been void for on average 14 weeks.
    - 18% of these lets were to working households where the place of work was in the neighbouring authority, mainly in communities within Fylde that were close to the border with Blackpool, Wyre or Preston.
  - b. Information on existing stock held by registered providers in Fylde, units built under a S106 agreement (that may contain sole occupancy restrictions to Fylde) and stock that is allocated through local connection policies of the wider MyHomeChoice Fylde Coast Consistent Assessment Policy. The report is based on property numbers received from MyHomeChoice, and is contained in Appendix 4. Within Fylde there are 3,248 units of general needs affordable rented stock and Independent Living Stock, managed by Registered Providers. Of these 619 have been enabled under a S106 planning agreement and 2,629 units would be allocated under the local connection criteria that forms MyHomeChoice Consistent Assessment Policy.
  - c. Registered Providers provided an update on properties they have in Fylde, average re-let time and areas or types of properties they have struggled letting. This information is contained in Appendix 5. Great Places advise they have a turnover of 5 units per annum with an average re-let time of 6 weeks. Places for People have 192 units with an average re-let time of 4 weeks, however Fylde stock is monitored with Wyre and Blackpool. Progress Housing have 2,519 units in Fylde and report an average re-let time of 6 weeks. General needs stock takes on average 6 weeks to let and Independent Living 7-8 weeks.
12. The summary of consultation responses in January 2018 and proposed changes to the MyHomeChoice Fylde Coast allocations policy is contained in Appendix 6. The following paragraphs deal with each of the proposed changes, summary of consultation responses received, EHH response with conclusions from the Working Group as to whether this proposed change is acceptable and compromises that have been reached.

#### **Revised local connection requirement**

##### **13. Proposed change**

The proposed change to the system was to enable local connection (and thereby access to the Fylde Coast housing register) to be established through connection to any of the three boroughs, so that people do not fall out of the system if they move from one part of the Fylde Coast to another.

This would mean that residents who have moved between the three Fylde Coast boroughs will now be able to get onto the housing register when previously they may not have met the local connection requirement. However priority will still be given to Blackpool residents for Blackpool homes, Fylde residents for Fylde homes, and Wyre residents for Wyre homes.

#### 14. Consultation responses

This was comprehensively supported in the survey, and this approach will now be implemented in the new system. Local connection will continue to be possible through residence, work, or family connection. Applicants with a local connection to the borough will be given priority in the first instance.

15. The EHH consultation response supported this proposal. Currently households move between the three boroughs, and could have lived in one area for several years, move out of the borough and lose their local connection to join the register. Households would still need to have a local connection to Fylde to be allocated accommodation in the first instance.

#### 16. Consistent Assessment Policy proposed amendments

Current policy local connection	Amended policy local connection
<p>Applicants have a local connection if they can demonstrate one of the following:-</p> <ul style="list-style-type: none"> <li>• Local residency – they have lived in the area consecutively for the last three years (does not include those that have been placed within the area).</li> <li>• Permanent employment in the area</li> <li>• Close family association – has a parent, adult child, adult brother or sister who is living in the area and has done so for the last 5 years</li> <li>• Applicants who are serving in the Armed Forces and who are either employed or are resident in the area.</li> <li>• Former Armed Forces Personnel who had a previous residence in the area as a result of a former posting to the area, within the last 5 years</li> <li>• Homeless applicants where there is a statutory duty to provide housing by Blackpool Council, Fylde Borough Council or Wyre Council</li> </ul> <p>For priority when bidding, there are 3 levels of priority:</p> <ol style="list-style-type: none"> <li>1. Connection to the LA</li> <li>2. Connection to the Fylde Coast</li> <li>3. No connection to either of the above (armed forces only)</li> </ol>	<p>When deciding eligibility, applicants must be able to demonstrate they have a local connection by one of the following:</p> <ul style="list-style-type: none"> <li>▪ Local residency – they have lived in the Fylde Coast area consecutively for the last three years (does not include those that have been placed in the area)</li> <li>▪ Permanent employment in the Fylde Coast area</li> <li>▪ Close family association – has a parent, adult child, adult brother or sister who is living in the Fylde Coast area and has done so for the last 5 years</li> <li>▪ Applicants who are serving in the Armed Forces and who are either employed or are resident in the Fylde Coast area</li> <li>▪ Former Armed Forces personnel who had a previous residence in the Fylde Coast area as a result of a former posting to the area, within the last 5 years</li> <li>▪ Homeless applicants where there is a statutory duty to provide housing by Blackpool, Fylde or Wyre Council</li> </ul> <p>Note: A new way of allocating properties is proposed.</p>

## Introduction of two ways of letting

### 17. Proposed change

The new system will offer at least 50% of homes, including those in the shortest supply, only to people in Bands A-C, each of these homes will be offered to the “bidder” with the highest priority. The rest of the homes will be available to everyone on the list and offered on a first come first served basis. This is designed to ensure that people in the greatest need still have access to the most homes, while offering opportunities to everyone who needs to move to move quickly to find a suitable home as soon as it is available.

### 18. Consultation responses

There was overall support for introducing a first come, first served lettings process alongside lettings based on priority banding, but many survey respondents had no clear view. It is proposed the new approach of two ways of letting will be taken forward, but kept under review to ensure that two thirds of lettings are made to applicants in priority bands A-C, compared with 64% to priority needs groups currently.

All lettings will give the first opportunity to applicants with a connection to the local borough. So, whether the letting is based on priority need or “first come first served”, applicants who have expressed an interest will first be prioritised based on connection to the local borough and then on priority need / time on the register (for the priority need lettings) or time of bid (for “first come, first served” lettings). This ensures that the current approach to local connection is maintained for all properties.

The policy will be slightly amended to ensure that housing providers advertise lettings under “first come first served” for at least seven days, to give local people a chance to see adverts and express an interest.

The concern about access to a computer will be addressed by making the updated system more user friendly on smart phones, which are used by the majority of applicants. It will still be possible to find out about available properties and express an interest through local offices of the Councils and partner social housing providers, but it is expected that the large majority of system users will continue to interact with the system on-line.

It is noted that the full local roll out of Universal Credit from December 2018 will require that most benefits claimants have digital access. Support is offered to applicants who struggle to understand and use the system, but the process of application will be simplified under the revised system, and this should go a long way to making the system more accessible. It is currently up to individual housing providers to organise the letting process and the notice that is given to new tenants. This will continue to be the case, but the local authorities will work with them to review their current approaches and encourage good practice.

The EHH consultation response supported the introduction of two ways of letting, but requested properties be advertised for 2 months to source an applicant with a borough local connection. It has been agreed there will be no change to the current time scales that properties are advertised. Currently properties are advertised for 7 days and a successful bidder is identified based on local connection to the authority and banding priority. If no one has placed a bid from Fylde, properties can then be offered to households with a local connection to another authority, based on banding priority.

In terms of SMS Texting the system is to upgrade the MHC software to version 10 which enables texting to be used in two separate ways to alert applicants who have agreed to receiving targeted alerts:

- 1) Via bulk texting which is sent from the system as back office admin. This can be sent to all applicants or sent to a specific group – i.e. all over 55s, postcode area if a scheme/property coming up with a S106 attached to it, if a 4 bed property all those with a more than 3 bed need.
- 2) Text messages direct to a households application – for example registered providers alerting people a property is coming up and for households to whom a homeless duty is owed.

The aim is for people to not become reliant on receiving texts to bid but if they are looking for housing to regularly check the system for vacancies.

## 19. Consistent Assessment Policy amendments

Current policy Selection Process	Amended policy Selection Process
<p>All eligible bids for each property are placed in priority order. Priority is decided first by any specific local connection criteria, band and then by effective date within the band. A bid for a property will not be considered if the applicant's household does not meet the size, age or disability requirements for that property unless there are exceptional circumstances which need to be taken into account. If more than one person from the same band bids for a property, it will go to the person who has the longest waiting time within that band.</p> <p>Partner landlords advertising properties will select and interview the top applicant/s before an offer is made. Each individual landlord is responsible for the verification of the successful applicant's circumstances, including taking up references.</p> <p>Selected applicants will be given the opportunity to view the property prior to tenancy sign-up.</p>	<p>The demand for social housing exceeds supply. Therefore, it is necessary to prioritise applications on the Housing Register to ensure housing stock is allocated appropriately.</p> <p><b>Properties Reserved for Applicants on the Housing Needs Register</b></p> <p>Shortlisting will be based on bids from applicants with a connection to the local borough and with the highest priority band. If bids are received from applicants in the same priority band, then the person with the longest Effective Date will be offered the property.</p> <p>Where a property is adapted for use by a disabled person, it will be offered to the applicant with the highest priority band whose needs best match the facilities of the advertised property.</p> <p>If there are no bids from applicants with a connection to the local borough, Partner Organisations will give consideration to applicants from other Fylde Coast areas.</p> <p>Bids will not normally be considered if an applicant's or their household does not meet the size, age or disability requirements for the property unless there are exceptional circumstances or local lettings arrangements.</p> <p><b>For Properties Open to all Applicants:</b></p> <p>Applicants expressing an interest in these properties will be shortlisted in order of connection to the local borough, and when the bid was placed, with preference given to the earliest bids. Any bids that do not meet the criteria may be bypassed.</p>

## How applicants are awarded a priority band

### 20. Proposed change

The proposal is to simplify the priority bands for people with a legally defined housing need so that there are only three bands, with the current bands C and D becoming a single band C. There will be no bands given to everyone else, making application simpler, while still allowing everyone to bid on first come first served homes. Households who do not have a housing need defined in law and were previously in Bands E and F are now placed on the housing register without a formal priority band.

### 21. Consultation responses

A relatively high 33% of respondents who disagreed with the proposal may reflect applicants who are unhappy with their current priority or length of time on the housing register without success. While local authorities have some discretion in how priority bands are defined, there is a minimum legal responsibility that applicants in "reasonable preference" categories are prioritised for at least 50% of social housing lettings. In the proposed Fylde Coast system, people in these "reasonable preference" categories are prioritised in

Bands A-C. Applicants who do not meet the legally defined criteria of Bands A – C but who have wider reasons for needing to move will have the opportunity to bid for the homes that are advertised as “first come first served”.

Time on the housing register will continue to be significant in deciding who is prioritised for homes allocated on the basis of priority need; where two applicants with the same priority band express an interest, it is the applicant who has been on the register for the longest time who is awarded the property.

22. The EHH Consultation response supported this proposal. It will simplify the understanding of housing need categories that gives households priority within the scheme.

23. Consistent Assessment Policy amendments - Proposed CAP Priority Bandings

Housing Needs Register	Criteria for each band
<b>Band A</b>	<p>Homeless applicants with a statutory duty to provide housing by Blackpool, Fylde or Wyre Council</p> <p>Or</p> <p>Applicants with a local connection and at least one of the following:</p> <ul style="list-style-type: none"> <li>• A vulnerable person , who faces imminent discharge from hospital or temporary residential care and for whom there is no suitable accommodation to return to</li> <li>• Applicants in exceptional circumstances including those in immediate danger of violence (at discretion)</li> </ul>
<b>Band B</b>	<p>Applicants with a local connection and one of the following:</p> <ul style="list-style-type: none"> <li>• Disrepair in current property with identified Category 1 hazard where the landlord has failed to take the required action.</li> <li>• Existing social housing tenant of a Partner Organisation who requires the property to be demolished or vacated.</li> <li>• Under occupancy of a property owned by a Partner Organisation (applicable after the start of a tenancy)</li> <li>• Adapted property, owned by a Partner Organisation, no longer required</li> <li>• Urgent medical or disability, exacerbated due to current property conditions, with a medical assessment supporting the applicants (including household members) need to be rehoused.</li> <li>• Armed forces personnel, currently serving or have served in the last 5 years (who meet at least one criteria from Band C)</li> <li>• Urgent social or welfare needs, for example: <ul style="list-style-type: none"> <li>• Admission into residential care or hospital if applicant is not rehoused</li> <li>• A dependent (under 16) will be accommodated by the Local Authority unless the applicant is rehoused into a suitable property.</li> <li>• The need to give or receive essential care and support</li> </ul> </li> <li>• At risk of serious harm in present accommodation, for example, domestic abuse, hate crime, anti-social behaviour or witnesses of crime.</li> <li>• Threatened with homelessness, or owed the initial homelessness statutory duty by Blackpool, Fylde or Wyre Council.</li> <li>• Property unintentionally overcrowded and in need of at least two additional bedrooms.</li> <li>• Leaving Local Authority Care, with appropriate tenancy support, where there is a statutory duty under the Leaving Care Act 2000 to provide.</li> <li>• Rough Sleeping, threatened with or have a history of rough sleeping who are</li> </ul>



	<p>supported and referred by Blackpool, Fylde or Wyre Local Authority Housing Teams.</p> <ul style="list-style-type: none"> <li>Leaving supported housing or rehabilitation accommodation and are ready for independent living with tenancy support (if required) in place.</li> </ul>
<b>Band C</b>	<p>Applicants with a local connection and one of the following:</p> <ul style="list-style-type: none"> <li>Medical or disability conditions (with no detrimental impact) with a medical assessment supporting the applicants need to be rehoused.</li> <li>Social or Welfare needs, for example, applicant requires to be rehoused to a particular area to avoid hardship to themselves or others.</li> <li>Disrepair in current property with identified Category 2 hazard where the landlord has failed to take the required action.</li> <li>Property unintentionally overcrowded and in need of one additional bedroom.</li> <li>Homeless with no priority need and no statutory duty owed by Blackpool, Fylde or Wyre Council</li> <li>In supported or rehabilitation accommodation and not ready for independent living and no tenancy support in place.</li> <li>Armed forces personnel currently serving or have served in the last five years.</li> </ul>

### Restrictions on the use of the system by existing social housing tenants

#### 24. Proposed change

The proposal is that existing social housing tenants should not be able to register for a new social housing property unless they have a housing need (Including current under occupancy). The purpose is to prioritise new applicants who are not already housed in social housing. Consultation response

Many respondents did not have a view either way and 23% disagreed. Local housing providers were concerned that they may lose working tenants if this exclusion did not allow some movement to be close to new job roles. The intention is to allow existing social housing tenants to register for new social housing if they either have a housing need or they are in permanent employment.

25. The EHH consultation response supported this proposal. The availability of affordable housing within Fylde is not sufficient to meet the levels of housing need and existing social housing tenants should not be able to move unless they have been awarded a priority based on their current circumstances.

#### 26. Consistent Assessment Policy amendments

<b>Current policy for existing tenants wishing to transfer</b>	<b>Amended policy for existing tenants wishing to transfer</b>
<p>All existing tenants of partners have the right to apply for a transfer, subject to having been a tenant of their current property for a minimum period of twelve months and any restrictions that apply to their tenancy. Applications for transfers are considered in the same way as a new application. Tenants' housing needs will be assessed and placed in the relevant band in the scheme together with all other applicants.</p> <p>In order to qualify, tenants must give access for a property inspection, viewings and sign ups and leave their home in good repair and decorative order. Tenants with rent arrears or other breaches of the tenancy agreement may be suspended from the scheme</p>	<p>Existing tenants of Partner Organisations have the right to apply for a transfer, subject to being in housing need/permanent employment, and any restrictions that apply to their tenancy. Applications for transfers will be processed in the same way as a new application. Tenants' housing needs will be assessed and awarded appropriate banding.</p> <p>To qualify, tenants must allow access for property inspections, viewings and sign ups. Properties must also be left in a good state of repair and in decorative order. Tenants with rent arrears or other breaches of their tenancy agreement may be suspended from the scheme</p>

## Priority to people in paid or voluntary work

### 27. Proposed change

The proposal slightly increases the chances for access to social housing for working applicants, in a similar way that Band E does under the existing system. The proposal is that 20% of homes made available on a first come first served basis will be offered with priority to people in paid or voluntary work. The proposed new policy seeks to strike a balance between meeting the needs of people in the greatest housing need, with providing opportunities for people who are working and often struggling to afford good quality market accommodation

### 28. Consultation responses

More people supported this proposal than disagreed, but there were comments both supporting and disagreeing with this approach. Given the opposing views for and against there was overall balance of support for the proposal, therefore the intention is that this aspect of the policy will be implemented.

29. The EHH Consultation response supported this proposal if there is a clear definition of 'working' and the revised allocations policy undergoes an impact assessment to ensure it is compliant with relevant legislation, such as the Equality Act.

30. The current policy details where at least one of the applicants is currently in employment. For the purposes of this consistent assessment policy employment is described as:

1. Over 16 hours a week (unless the remuneration is substantial)
2. The main place of work is within the Authority
3. Offers of employment should be regular, intended to last for more than 12 months and there is a genuine intention to take up the offer of work
4. Appropriate evidence is provided which may include contract of employment, wage/salary slips, formal offer letter and tax and benefits information.

31. The Fylde Council legal team have provided comments on the proposed Consistent Assessment Policy and Equality Impact Assessment. Comments have been and have fed back to the Fylde Coast Housing Providers for further consideration around the Equality Act in respect to working households and data sharing under the changes with the General Data Protection Regulations which came into force from 01/04/2018.

### 32. Consistent Assessment Policy amendments

Current Policy on employed households	Amended policy concerning employed households
<p>Employed households are currently given priority under BAND E</p> <p><b>To be placed in this band, applicants must be able to demonstrate a local connection and one of the following ...</b></p> <ul style="list-style-type: none"><li>• At least one adult member of the household is in full time employment either in the local area or elsewhere</li><li>• At least one adult member of the household is contributing to the community through voluntary work</li></ul>	<p>A maximum of 50% of properties advertised will be made available to all applicants registered on the system - those on the Housing Needs register and those who are not. Applicants expressing an interest in these properties will be shortlisted in order of when their bid was placed, with the preference given to the earliest bids.</p> <p>In order to recognise and reward those who work and make a contribution to the community, 20% of lettings available to all applicants will prioritise people who meet the working households and community contribution criteria.</p>

## Flexibility in the sizes of properties that applicants can bid for

### 33. Proposed change

Under the current CAP the number of bedrooms for which applicants are eligible is determined by the size of their households and in line with DWP regulations. Instead of allowing applicants to express an interest in a home that meets their household's minimum needs, the new proposal will allow households, as long as the rent is affordable, to be able to get a homes that has one extra bedroom. The intention is to make social housing attractive to a wider range of people.

### 34. Consultation responses

There was very strong support for this policy in both the survey response and comments. But there is also concern to ensure that those properties that are in the shortest supply – typically large family houses – continue to be allocated to people who need all of the space.

It is proposed that the policy to allow applicants to register and be able to bid on properties with one bedroom more than their minimum requirement will be implemented, but there are likely to be restrictions placed at the point of advertising and letting on under-occupying large properties in local areas where these are in short supply.

35. The EHH consultation response disagreed with this proposal. Currently there is not enough stock within Fylde to allow households to under occupy accommodation. A compromise has been reached where applicants can only be allocated one extra bedroom and at the point of advertising restrictions can be placed on letting on under-occupying large properties in local areas where these are in short supply.

### 36. Consistent Assessment Policy amendments

Current policy on property sizes	Proposed policy on property sizes
<p>The numbers of bedrooms for which applicants are eligible is determined by the size of their household and in line with DWP regulations. As there is a shortage of larger homes, applicants are advised to consider a property that has two living rooms where one can reasonably be used as a bedroom.</p> <p>Single adults or couples (16+) = 1 bed</p> <p>Two adults (16+) living together but not in a relationship = 2 bed</p> <p>Parent(s) 1 child = 2 bed</p> <p>Parent(s) with 2 children of same sex or different sexes under the age of 10 = 2 bed</p> <p>Parents(s) with children of different sexes – one or both being over the age of 10 = 3 bed</p>	<p>The numbers of bedrooms which applicants need is determined by the size of the household and in line with DWP regulations. As there is a shortage of larger homes, applicants are advised to consider a property that has two living rooms where one can reasonably be used as a bedroom.</p> <p>The number of bedrooms needed is calculated as one bedroom for:</p> <ul style="list-style-type: none"> <li>▪ Every adult couple</li> <li>▪ Any other person aged 16 or over</li> <li>▪ Any two children of the same sex</li> <li>▪ Any two children regardless of sex under age 10</li> <li>▪ Any other child</li> </ul> <p>Applicants will be permitted to bid for a property in accordance with their calculated need and also for properties with one bedroom more than their calculated need. But letting of properties that are larger than an applicant's calculated need will be subject to affordability and pre-tenancy checks.</p> <p>Providers may advertise some properties that are in short supply, such as large houses, as only being available to applicants whose calculated need is the same as the size of the property.</p>

## **Whether the arrangements overall will enable the best use of social housing**

### **37. Consultation responses**

There was positive feedback from the survey that a majority of respondents think that the arrangements overall will enable the best use of social housing, with only 11% disagreeing. There were further comments on how the system operates, including age restrictions for ground floor properties and a suggestion that down-sizing is dealt with outside of the system.

38. Age restrictions, and housing providers' local lettings policies more generally, will be kept under review to ensure that there is an appropriate balance between meeting the needs of particular groups (like older residents) and opportunities for the wider population.

39. The EHH consultation response neither agreed nor disagreed with this statement. It was recommended that the policy is reviewed after a period of two years.

## **Income and savings threshold**

### **40. Proposed change**

There were no changes proposed to the income and savings threshold, but the consultation sought to get views on whether these remained appropriate.

### **41. Consultation responses**

The survey response showed general support for maintaining the existing thresholds, but many comments were received that advocated either lowering or, conversely, removing the thresholds.

42. EHH consultation response agreed that the current restrictions on income and savings for social rented accommodation within Fylde.

## **Conclusions**

43. Through the Working Group a full and considered consultation response was provided to the Fylde Coast Housing Providers (Appendix 2) on the proposed changes to the Consistent Assessment Policy of MyHomeChoice Fylde Coast (Allocations Policy) and the results of the wider consultation (Appendix 6) studied. Information was provided to enable the Working Group to consider the impact of the proposed changes to the Consistent Assessment Policy, namely; Appendix 1 analysis of circumstances of households registering with MyHomeChoice Fylde Coast 2015-2017; Appendix 3, Analysis of properties allocated to households outside of Fylde; Appendix 4, Current affordable stock within Fylde; and, Appendix 5 Feedback from Registered Providers.

44. The proposed changes will help to alleviate delays in the current system for applicants by bringing in an element of flexibility in ways households can access affordable housing. Registering for re-housing will become simpler and quicker to access and more responsive to mobile phone internet use. It will also address the concerns registered providers have expressed in the letting of their stock within Fylde via MyHomeChoice Fylde Coast.

45. It is recommended the proposed changes to MyHomeChoice Fylde Coast allocations policy and lettings system are accepted and a similar review of information supplied to the Working Group be undertaken in one year's time, by this Committee. The purpose to ensure MyHomeChoice Fylde Coast continues to meet the strategic role of the Authority in assessing and meeting housing need within the borough.

46. A draft copy of the revised CAP February 2018 and Equality Impact Assessment January 2018 are available in Appendices 7 and 8.

IMPLICATIONS	
Finance	None
Legal	Revised allocations policy undergoes an impact assessment to ensure it is compliant with relevant legislation, such as the Equality Act and GDPR.
Community Safety	None
Human Rights and Equalities	None
Sustainability and Environmental Impact	None
Health & Safety and Risk Management	None

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BACKGROUND PAPERS		
Name of document	Date	Where available for inspection
My Guide to Applying for a Home	2011	<a href="http://www.myhomechoicefyldecoast.co.uk">www.myhomechoicefyldecoast.co.uk</a> <a href="https://www.myhomechoicefyldecoast.co.uk/NovaWeb/Infrastructure/ViewLibraryDocument.aspx?ObjectID=306">https://www.myhomechoicefyldecoast.co.uk/NovaWeb/Infrastructure/ViewLibraryDocument.aspx?ObjectID=306</a>
MHC Consistent Assessment Policy	2011	<a href="https://www.myhomechoicefyldecoast.co.uk/Data/ASPPages/1/176.aspx">https://www.myhomechoicefyldecoast.co.uk/Data/ASPPages/1/176.aspx</a>

Attached documents:

Appendix 1 – Analysis of households registered with MyHomeChoice Fylde Coast 2015 to 2017 – October 2017

Appendix 2 – Environment Health and Housing Consultation response

Appendix 3 - Analysis of allocation of properties to households without a local connection to Fylde

Appendix 4 - Current Stock held by Registered Providers in Fylde April 2018

Appendix 5 - Feedback from registered providers

Appendix 6 - MHC Consultation Summary Jan 18

Appendix 7 - MHC Consistent Assessment Policy - 28th Feb 2018

Appendix 8 - Equality Impact Assessment CAP MHC Jan 2018