

Appendix B: Summary of change to Allocations Policy

Purpose of this document: To provide a summary of proposed changes to the Allocation Scheme and the April 2017 document.

#	Section	Previous version (where applicable) & proposed change	Rationale	Major / minor?
1	Allocation Scheme, 2.5.1-2.5.3	<ul style="list-style-type: none"> - Our proposed new banding is: <ol style="list-style-type: none"> 1. Band 1: Emergency 2. Band 2: High 3. Band 3: Medium 4. Band 4: Low - The following band changes have been proposed: <ol style="list-style-type: none"> 1. Homeless with additional need will be moved to “High”; 2. Current rehousing reason within “High” band will be placed in “Medium” band (unless otherwise stated); 3. Medical High moved in to “High” (instead of “Medium”); 4. We propose introducing an “overcrowded by 3 bed” rehousing reason in “High”; 5. All previous “Band 3 Priority” will remain in “Band 3 Medium Priority” except for: <ul style="list-style-type: none"> ▪ Overcrowded by 1 bed, which will be placed within “Low” priority. 	<ul style="list-style-type: none"> - The reasons for this new banding structure are: <ol style="list-style-type: none"> 1. To create a banding system that responds to housing need within the borough given the high demand for social housing and the scarcity of social housing available. 2. Introducing a new homeless with additional need priority will ensure the Council is able to respond to those very specific group of homeless applicants who through the support they receive from the Council have a need to remain within the Borough, and for whom other tenures such as the private rented sector are untenable. 3. Overcrowded by 3 bed – This proposal recognises that overcrowding is now more severe than ever within the Borough. We estimate that around 160 applicants within Lewisham are overcrowded by three beds or more. At present they will wait many years before being allocated accommodation, and it is appropriate to increase their priority given the high level of housing need they are in. The likelihood of this group receiving those properties is low given the scarcity of large properties available on the social housing register. We propose that when awarding this primary rehousing reason, adult children are not considered when calculating the size of property required for applicants, unless they are dependents or are caring for another adult or adults in the household. Households who are overcrowded by 3 bed for the reason of having non-dependent adult children in the household will be awarded overcrowded by 2 bed. 	Major

			<ol style="list-style-type: none"> 4. Overcrowded by 1 bed – this group will be moved to a new band 4 to reflect the moving of overcrowded by 2 bed to band 3 medium. 5. Medical high - we believe that the housing need of these applicants is sufficient enough to warrant the continued allocation of high priority to this group. 	
2	Allocation Scheme	<ul style="list-style-type: none"> - We propose the introduction of a “smart letting” scheme. We propose ring-fencing up to 20% of available properties to someone already living in social housing (a transfer applicant) who is in need, and made sure that the property they vacate is ring-fenced to someone living in the PRS / Temporary Accommodation (non-transfer applicant). - This policy has been proposed as it represents an opportunity to solve more housing need with the resources we have. Aside from building new social homes, this is a key way for us to make best use of the available social housing with the resources we have. For each property, we could solve two households’ needs, whilst also maintaining equitable access to the available lets. - This will be subject to a review after 12 months 	<ul style="list-style-type: none"> - This smart letting system would enable the Council to resolve housing needs for multiple households. This policy has been proposed as it represents an opportunity to solve more housing need with the resources we have. For each property, we could solve two households’ needs, whilst also maintaining equitable access to the available lets. 	Major
3	Allocation Scheme, 2.2.	<ul style="list-style-type: none"> - We propose changing the Three Offer rule to a two offer rule 	<p>We believe that a ‘Two Offer’ policy is reasonable, given that:</p> <ol style="list-style-type: none"> 1. that there is a need for the Council to let properties as quickly as possible; 2. that there is an administrative burden for officials for those who refuse offers; and 3. that the resident has bid for the property and indicated preference for that property. 	Major
4	Allocation Scheme, 3.1.8	<ul style="list-style-type: none"> - We propose increasing the number of bids an applicant can make so that they can bid for multiple properties per week. This proposal will only be implemented if the system is operationally deliverable – officials will review the Council’s online system to assess this. 	<ul style="list-style-type: none"> - This is beneficial for applicants as they will be able to express preference for more than one property and not be constrained by the system. 	Major

5	How the Policy is applied, 3.3.1	<ul style="list-style-type: none"> - We propose excluding adult children over 21 from calculating how many bedrooms are required for the consideration of the new overcrowded by 3 bed primary rehousing reason, unless they are a dependent or are caring for another adult or adults in the household. 	<ul style="list-style-type: none"> - Because the council has a disproportionately few large properties available it is necessary to ensure that this priority group targets these properties at households with dependent children. 	Major
6	How the Policy is applied, 3.4.4	<ul style="list-style-type: none"> - We propose adding delegated powers for officers to implement minor changes to the policy, so that they do not have to go to Mayor and Cabinet for approval of future minor changes. 	<ul style="list-style-type: none"> - This would mean officials can be more flexible and responsive to changes. 	Minor
7	Front page & contents	<ul style="list-style-type: none"> - Title updated to "Housing Allocation Policy" - Updates required to contact details - Contents – section numbers and titles require updating. 	<ul style="list-style-type: none"> - Allocation Policy is more accurate about what the document is - Contents and contact details need to be accurate - Terminology throughout document must be consistent. 	Minor
8	Whole document	<ul style="list-style-type: none"> - Use numbered paragraphs. 	<ul style="list-style-type: none"> - Clarity, ease of navigation. 	Minor
9	Whole document	<ul style="list-style-type: none"> - Update terminology. 	<ul style="list-style-type: none"> - Ensure consistency and accuracy. 	Minor
10	Whole document	<ul style="list-style-type: none"> - Phone numbers, emails and links to check and update. 	<ul style="list-style-type: none"> - Ensure consistency and accuracy. 	Minor
11	Introduction, 1.1	<ul style="list-style-type: none"> - Introduction will be rewritten. 	<ul style="list-style-type: none"> - Agreed wording needs to be clearer, updated and the purpose of the policy needs to be simpler for residents to understand. 	Minor
12	Introduction, 1.1	<ul style="list-style-type: none"> - Paragraph 1 - Numbers on housing list (9,500) and number of properties allocated (1,000) needs updating - Paragraph 7 – tenancy strategy wording needs to be amended or deleted - Paragraph 8 – Need to check and update the documents that the policy complies with. 	<ul style="list-style-type: none"> - Accuracy - Tenancy strategy last published in 2011 	Minor
13	Introduction, 1.2	<ul style="list-style-type: none"> - List of housing options requires checking and updating. 	<ul style="list-style-type: none"> - Ensure consistency and accuracy. 	Minor
14	Introduction, 1.2	<ul style="list-style-type: none"> - Para 10 ("Our officers or your landlord will...") – rewording required. 	<ul style="list-style-type: none"> - Wording is unclear and needs to be simpler to understand. 	Minor

15	Introduction, 1.2	- Para 13 – “you should liaise with the Housing Medical Officer and the Community Occupational Therapy Team” – requires additional information.	- Wording is unclear and needs to communicate to residents how they would access these officers (phone number, email).	Minor
16	Introduction, 1.2	- Para 14 – “There are a number of initiatives the Council supports...” – requires checking and updating	- Needs to accurately reflect current service provision.	Minor
17	Introduction, 1.2	- Para 15 – requires updating in line with Council policy.	- Ensure consistency and accuracy.	Minor
18	Introduction, 1.3	- Properties excluded requires checking and updating - Final paragraph – housing needs group – requires checking.	- Ensure consistency and accuracy.	Minor
19	Introduction, 1.4	- References require updating.	- Ensure consistency and accuracy.	Minor
20	Introduction, 1.4	- Equalities Analysis Assessment requires carrying out alongside policy development.	- Legal requirement and good practice.	Minor
21	Allocation Scheme policy, 2.1.1	- Section requires review and update.	- Ensure consistency and accuracy.	Minor
22	Allocation Scheme, 2.2.2	- Requires updating in line with equalities impact assessment.	- Ensure consistency and accuracy	Minor
23	Allocation Scheme, 2.2.2	- Paragraph 2 – “Housing Panel and Supported Housing priority cases are allowed to bid for themselves” requires updating.	- Ensure consistency and accuracy.	Minor
24	Allocation Scheme, 2.4	- Section - What happens to other people currently living with me? - Fresh Start requires updating.	- Ensure consistency and accuracy.	Minor
25	Allocation Scheme, 2.5.2	- Para 3 – requires updating.	- Ensure consistency and accuracy.	Minor

26	Allocation Scheme, 2.5.2	- Para 5 – requires updating.	- Ensure consistency and accuracy.	Minor
27	Allocation Scheme, 2.5.3	- Para 1 – requires updating.	- Ensure consistency and accuracy, and following discussions with Legal Counsel.	Minor
28	Allocation scheme 2.5.3	- A number of rehousing reasons within this band not included within the previous policy document; these need to be included.	- Ensure consistency and accuracy.	Minor
29	Allocation Scheme, 2.5.1-2.5.3	- Homeless prevention rehousing reason to be removed from bands - Welfare – affordability rehousing reason to be removed from bands - Update band name 'Occupier is unable to succeed tenancy' to 'Discretionary succession' - Update band name 'Medical Low' to 'Medical'	- There are very few people who have these rehousing reason. These applicants will not be removed from the register but will be absorbed into other reasons. - The homeless prevention rehousing reason is now out of date following introduction of Homelessness Reduction Act. - Band name changes proposed for clarity and ease of understanding	Minor
30	Allocation scheme, 2.6	- Requires updating as per changes to banding.	- Ensure consistency and accuracy.	Minor
31	How the Policy is applied, 3.1.1	- Online housing application link requires updating; references to Homeseach require updating if appropriate.	- Ensure consistency and accuracy.	Minor
32	How the Policy is applied, 3.1.5	- Need to add a clause regarding a new requirement that residents must review their application and re-register on the housing register on an annual basis.	- Administrative efficiency.	Minor
33	How the Policy is applied, 3.1.7	- We need to add a quorate number for the Emergency Housing panel - Additional sentence required stating that panel has discretion to offer bed size or any larger bed size.	- Ensures transparency.	Minor
34	How the Policy is applied, 3.3.1	- Para 4 – “4 bedroom properties are offered to households consisting of a couple or lone parent, with four or five children, or 4 adults where no two are living as a couple as set out above” – requires updating	- Requires amendment to be in line with housing benefit rules and following discussions with Legal Counsel.	Minor
35	How the Policy is applied, 3.3.3	- Add clarification : 1. If you are moved to a new, higher band, your list date will move to the date you were moved to the new band	- Clarification	Minor

		2. If you are moved to a lower band you will keep your original list date.		
36	How the Policy is applied, 3.4.3, 3.4.4 (lettings plans)	- We propose merging the local lettings and annual lettings plan paragraphs, maintaining a provision to publish these plans at our discretion.	- Ensure consistency and accuracy and a simpler document for residents to understand.	Minor
37	Reviewing this Policy section of policy	- Remove reference to Annual Lettings Plan. Amend wording relating to delegation.	- Amendment to wording proposed: "Amendments to this policy not reflecting a major change of policy, may be made by the Executive Director for Customer Services in consultation with the Head of Law [Director of Law Governance and HR] and such changes will be reported to Members annually."	Minor
38	How the Policy is applied, 3.1.3	- Policy needs to be GDPR compliant and wording in place to reflect this.	- Consistency, legality.	Minor