

# Communities Scrutiny Commission

## 3<sup>rd</sup> October 2022



**Report of:** Stephen Peacock – Executive Director Growth and Regeneration

**Title:** Bristol Housing Allocations Scheme Review

**Ward:** City-wide

**Officers Presenting Report:** Donald Graham (Sponsor) / Paul Sylvester (Exec) / Elizabeth Dewing (PM)

**Contact Telephone Number:** N/A

### **Recommendation:**

Commission members are invited to comment on the ongoing work on the review of the Housing Allocation Scheme and the proposals currently open to citywide engagement until 7 October.

### **The significant issues in the report are:**

The current context and the challenges of managing the housing allocation scheme when faced with overwhelming demand for social housing and highly constrained supply. (Paragraphs 2.1 to 2.6)

The desired outcomes at the end of the project (Paragraph 2.7)

The scope of work (Section 3)

The process followed to develop the proposals for public consultation and other proposed changes to improve the scheme. (Section 4)



## 1. Summary

## 2. Purpose

2.1 There is a chronic housing supply and demand issue in Bristol, with the demand for housing significantly outstripping supply across all housing types in the City. Our Social Housing stock is no different and it is important to acknowledge the tension around the objectives of providing mixed and balanced communities and offering choice around housing for citizens, versus the reality of what is available, where, and when, to meet citizens' fundamental need to have a home in the city.

2.2 There are currently over 18,000 households on the register and approximately 1500 allocations were made in 2021/2022.

2.3 The Bristol Housing Allocations Scheme Review project is tasked with delivering a revised Housing Allocations Policy that addresses the identified issues in the current system, ensures we prioritise housing those in greatest need, making the system easier to use and understand, managing the expectations of people who join the housing register, and contributing to the creation of mixed, balanced, sustainable communities.

2.4 This involves making changes to the policy, the processes that deliver against the policy, and potentially the tools (technology) and organisation that enable the policy.

2.5 The project seeks to address the following, identified, current housing allocation whole system issues:

- Reducing the administrative burden associated with the very high number of applicants in the lowest band who are unlikely to be housed.
- Reducing failure demand: Introducing communication, information and guidance and changes to the application and other processes that streamline, simplify and make the process easier to follow, enabling better expectation management from the point that people join the register.
- Making better use of existing stock, for example by finding ways to encourage people who are under-occupying to release the bigger properties and downsize.
- The sustainability of community – for example by extending the use of local lettings policies to enable people to remain living within their community as their housing needs change.
- Improving access to housing for priority cohorts currently not explicitly covered within the current Policy: e.g. increasing the priority of Care Leavers and supporting the decision to make greater provision for Adults leaving supported pathways.

2.6 We need to acknowledge, however, that even after the Policy has been revised there may not be sufficient social housing supply to meet the top priority need (“most in need”), meaning difficult decisions have to be made around who ultimately secures housing.

### 2.7 The key project deliverables are consequently:

- A revised Housing Allocations Policy, including consideration of associated policies.

- Re-engineered/new associated processes to improve citizen experience and support the most efficient and effective implementation of the revised Housing Allocations Policy.
- A review of the existing organisation structure, with recommendations on a direction of travel, which may include a new organisational structure, to support the most efficient and effective implementation of the revised Housing Allocations Policy.
- Technology change that will see the exploitation of the new Housing IT System (expected delivery early 2024) alongside consideration of short-term changes to the current Abritas system provided if viable.
- Revision and implementation of an updated Partnership Agreement with the RP's who provide properties through HCB.

### 3. Policy

The current Bristol Housing Allocation Scheme Policy is under review with a number of amendments being proposed.

Key related and peripheral policies are also being assessed to ensure alignment and coherence, namely,

- Landlord Agreed Transfers,
- Sensitive Lets,
- the Priority Move On Scheme,
- Externally Supported Accommodation (ESA),
- Community Supported Accommodation (CSA),
- the Keyring Scheme, and
- Mutual Exchanges.

### 4. Consultation

A highly consultative approach has been taken to the development of the proposals.

#### a) Internal

- Staff groups and internal subject matter expert were involved in **initial discussions** in 2019 to identify issues, and further groups were engaged with after the project was restarted in late 2021.
- **Desktop research** was performed resulting in the production of the Evidence Based CBL Report in August 2019

#### b) External

- An **initial survey** was run to explore expectations around social housing.
- Locality was contracted to deliver a **series of community consultation events** to better understand the assumptions, processes, and outcomes for who gets social housing in the city. In particular, to hear views from the city's more excluded communities in relation to new methods of managing an allocations policy or devising local variations of its existing allocations policy into the future.
- The Covid 19 pandemic meant that the concluding event was not held, however a report was produced documenting the findings of the four events.

The project was placed on hold from March 2020 until August 2021. It was restarted in August 2021 and the following consultation activities were undertaken.

- TPXImpact (formerly futuregov) were contracted to deliver a series of **4 Journey Mapping Events** to engage representatives from all key stakeholder groups in an end-to-end walk through of the HomeChoice process and identify pain points and opportunities for improvement.
- A **series of focus groups** was held with special interest groups to better understand their lived experience and needs. These included people living with disabilities, people exiting healthcare facilities, the homeless, older people, young people (including care leavers), and victims of domestic violence and harassment.
- An external housing expert provided **an expert opinion** on the current scheme, opportunities for change.
- **Submissions** were invited and received from Shelter and Bristol Law Society
- A **Members Working Group** and a **Residents' Working Group** were also established to participate in the process.

A full public consultation is currently underway on the key proposals for change. This commenced on 15 July and is running until 7 October. As at 19 August 1135 responses had been received.

The survey can be found here <http://www.ask.bristol.gov.uk/housing-allocations>  
(.pdf of the survey is also attached)

Following the conclusion of public consultation, the feedback received will be assessed and final proposals for change will be formalised. As this involves changing a key policy any changes will need to be approved by Cabinet before implementation. The current schedule aims to present to Cabinet for a decision on 17 January 2023.

## 5. Public Sector Equality Duties

- 5a) Before making a decision, section 149 Equality Act 2010 requires that each decision-maker considers the need to promote equality for persons with the following “protected characteristics”: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation. Each decision-maker must, therefore, have due regard to the need to:
- i) Eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010.
  - ii) Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to --
    - remove or minimise disadvantage suffered by persons who share a relevant protected characteristic;

- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of people who do not share it (in relation to disabled people, this includes, in particular, steps to take account of disabled persons' disabilities);
  - encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- iii) Foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to –
- tackle prejudice; and
  - promote understanding.
- 5b) A full EQIA focusing on protected characteristics and the impact (positive and/or negative) of any proposed changes will be developed, with the assistance of Equalities Team colleagues, in support of the proposals that are to be put forward in November/ December.

It is worth noting that several protected characteristics are disproportionately represented on the Housing Register e.g. People living with disabilities, Care Leavers (Young people)

In addition, certain of the proposals would require further EQIA's to be developed as they are implemented e.g. The proposal to extend the use of Local Lettings Policies: Every Local Letting Policy requires a full EQIA to ensure that there is legitimate justification for the preferences included, and that the impact on the wider service user base has been considered.

**Appendices:**

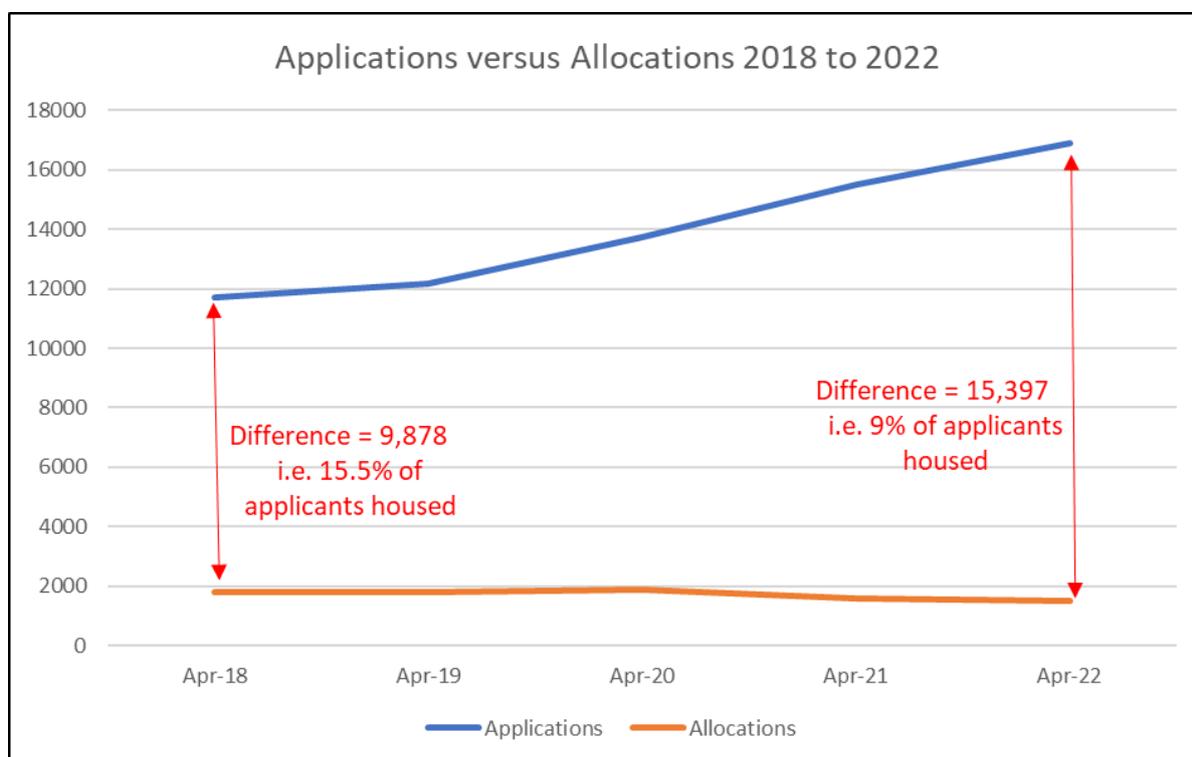
- Housing Applications vs Allocations Statistics
- Housing Applications by Reason and Band
- Current Housing Allocation Policy (.pdf format)
- Housing Allocation Survey (.pdf format)
- Additional changes not included in public consultation
- Applicable government guidance
- Communication of Policy change
- HomeChoice Bristol Organisation

**LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

**Background Papers:** None

## APPENDICES

- Housing Applications vs Allocations Statistics



	Apr-18	Apr-19	Apr-20	Apr-21	Apr-22
Applications	11693	12181	13725	15486	16907
Allocations	1815	1805	1885	1586	1510
HA housing Stock	9996	10000	10064	10358	11248
BCC Housing stock	27198	27198	27095	27100	26945



- **Current Housing Allocation Policy**



HCB allocation  
scheme May 2021.pc

- **Housing Allocation Survey as out for Public Consultation (.pdf format)**



Housing Allocation  
Review Survey Print

- **Additional process changes proposed but not included in Public Consultation**

Process Changes	
Application	Review, simplify, reorganise to be more user-friendly
Communication	More frequent comms, new comms channels such as video, graphics, chat etc
Information & Guidance	Increased and improve explanations, information, provide more information and marketing of alternative housing options
Info provision	Easy and flexible access to information about applications/ allocations / availability/ wait times etc for applicants, councillors and officers and general public
Support and assistance	More avenues of support and greater consistency
Advertising	Better information, more consistency

We also intend proposing a significant ‘housekeeping’ undertaking to clean the data on the current list and ensure that it is as accurate, complete and up-to-date as possible with all existing policy conditions activated as appropriate.

The confidence level in contact data is fairly high (as reflected by the 89% delivery rate on emails and text messages sent out to notify HCB applicants about the survey) however there are concerns about the currency and completeness of older applications that remain on the register and which have not been updated for several years.

- **Applicable Government Guidance**

The Housing Allocations Scheme has to comply with the requirements of Parts VI and VII of the Housing Act 1996 (as amended), and has regard to the following:

- Allocation of accommodation: guidance for local housing authorities in England 2012
- Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006, SI 2006/1294 as amended
- The Allocation of Housing (Qualification Criteria for Armed forces) (England) Regulations 2012
- The Housing Act 1996 (Additional Preference for Armed Forces) (England) Regulations 2012

(SI 2012/2989)

- Immigration (European Economic Area) Regulations 2006, SI 1006/1003 as amended
- Bristol City Council Tenancy strategy published in March 2012
- Bristol City Council Preventing Homelessness strategy published in October 2013
- Providing social housing for local people: December 2013 statutory guidance on social allocations for local authorities in England
- Homelessness Reduction Act 2017

There is also a degree of advisory involvement. For example, following an engagement in late 2021, input was received from the **Homelessness Advice and Support Team** under the Department for Levelling Up Housing and Communities (DLUHC). This input raised a number of points which have been considered in formulating proposals, including the following:

- Process - Information in home choice applications about homelessness should be routinely shared across to Housing Officers so opportunity to prevent homelessness is maximised  
*Action: Internal process amendment to improve feedback loop from HP Team to HA's*
- Observation - Direct lets list operating alongside the housing register. Unclear how transparent this is and appears to have developed due to failure of register to function well.  
*Action: Proposal to change to 'Managed Choice' approach in which up to 50% of allocations are made by means of Direct Offer. Makes this process more transparent as well as increasing the number of cases that can be expedited.*
- Suggestion - Banding favours those with the Main Duty and can lead to behaviours in applicants to aim for higher banding –alternative approaches deployed across the country have prevention in higher band to encourage more planned moves. For example staying with family/friends would have a higher band than temporary accommodation to promote delayed homelessness

*Action: Two proposals included in Public Consultation that speak to the above:*

- *Proposal to increase priority of relief and prevention vases to Band 2 (same as main duty cases)*
  - *Proposal to introduce a 'new deal' for the 'homeless at home' to encourage those who are able to do so to remain with family / friends whilst waiting and to be rewarded for doing so through backdates*
- **Communication of Policy Change**

The implementation of any changes following the public consultation and subsequent decision-making at Cabinet would be communicated making use of the normal channels including the following:

- Consultation Report and feedback on changes made to the policy as a result of the consultation, published on the Ask Bristol Housing Allocations Review consultation page and the HomeChoice Bristol site
- Communication by text message / email to everyone on HomeChoice Bristol to notify them where they can find detailed information about the changes
- Update of the HomeChoice Bristol site with the revised Policy and explanations
- Internal communications and training sessions to educate Officers about the changes
- Internal communications and training sessions to equip Call Centre Staff and Customer Service Point Officers to deal with enquiries

- It is worth noting that improving communication with service users is one of the objectives of the review in the first place.

- **Organisation Chart – HomeChoice Bristol**

