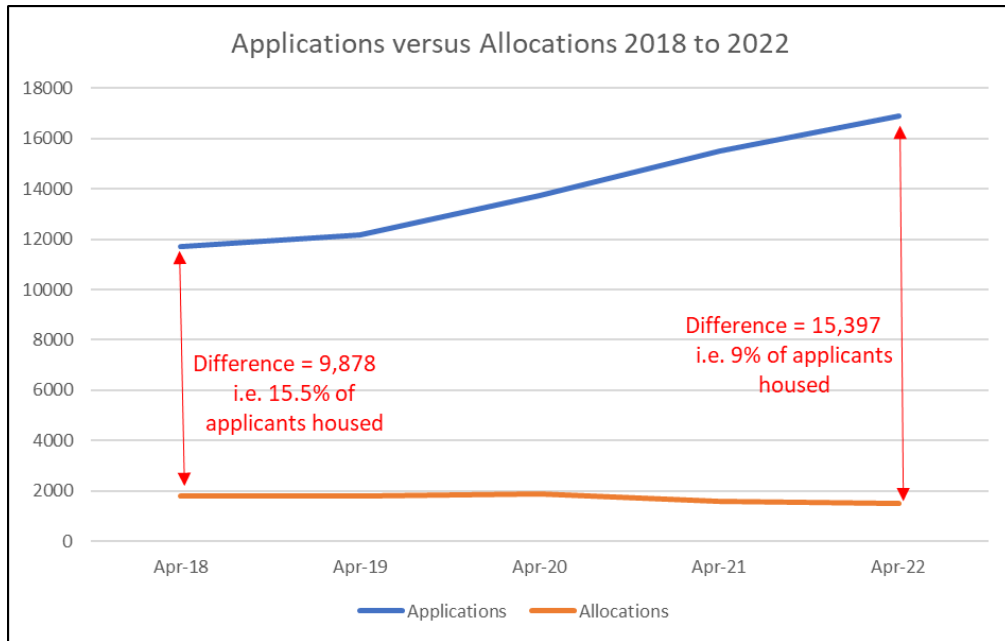


APPENDIX A1 – Housing Allocations Review:

Detailed Reasoning for each recommendation

This document provides a more detailed contextualised view of each of the recommendations

GENERAL STATISTICS



1. POLICY CHANGE RECOMMENDATIONS

Policy changes were developed under three categories: Changes affecting the model / approach, changes affecting how cases are prioritised, and changes that improve the ability to better manage the imbalance between demand and supply.

1.1 Adopt 'Managed Choice' model with up to 50% of allocations being made by means of direct offer. (Priority 1)

Our property supply is seriously limited and falls far short of the number of people who need housing. This includes a lack of larger properties (3-bed or more), which presents problems when trying to house larger families in high need.

We currently use a 'choice based' lettings system giving people the chance to choose which council house or housing association accommodation they want to bid on with properties being advertised through HomeChoice Bristol.

Under a choice-based lettings scheme an applicant can bid for properties they are interested in. Generally, accommodation is offered to the bidder who has the highest priority under the allocation scheme and who matches the lettings criteria for the property.

We currently allocate up to 30% of properties by means of a 'direct offer' where we proactively match a property to an applicant and offer it to them rather than waiting for them to bid. This is done to speed up the highest need cases by matching them to properties that meet their bedroom need – the most fundamental requirement.

At present, many people in Bands 1 and 2 have high expectations about being able to successfully bid on something that meets ALL their however due to the extreme limitations in stock we are unlikely to ever be able to completely satisfy most people by meeting all their housing preferences.

By increasing our ability to intervene to match people to suitable properties and make them direct offers we believe we will be able to address homelessness and other critical situations and move people on into suitable properties faster.

In doing so we expect to reduce the volume and duration of requirements for Temporary Accommodation.

1.2 Improve access for those leaving supported care (Priority 1)

Many people who are currently living in supported accommodation and have social care needs are capable of living with less support. Helping more of these people to move into social housing with floating support would improve their quality of life, as well as freeing up capacity in supported accommodation for those in greater need.

Similarly, facilitating the exit of Care Leavers from Externally Supported Accommodation into general needs housing where appropriate for those who are capable of living independently would improve their quality of life, as well as freeing up capacity in externally supported accommodation for young people in greater need.

We intend proactively planning on an annual basis for the provision of homes for this category of service user.

1.3 Increase the priority of Care- Leavers to Band 1 (Priority 1)

All councils have 'Corporate Parenting' duties to help young people who are leaving, and have left, local authority care. Currently care leavers who have been assessed as ready to move on from external supported accommodation are placed in Band 1 and other care leavers are placed in Band 2.

Going forward, we propose placing all care leavers who require social housing in Band 1 as long as they meet conditions relating to their ability to live independently as assessed through Care.

This approach will encourage more care leavers to complete the programme that prepares them for and improve their ability to transition to independent living.

1.4 Extend the use of Local Lettings Policies (Priority 1)

Most allocations are made from the general allocations scheme, however we also have the discretion to use Local Lettings Policies (LLPs) to address specific localised issues. For example, LLP criteria can prioritise those with long-standing local residence or employment.

It is recommended that the use of LLPs be extended in future. A standard template and approach to has been developed for this purpose (See Appendix A7: Template for Local Letting Policy Development). This will ensure a consistent approach and process is followed, including representative community involvement in the development of future LLP's.

LLP's are to be introduced in areas with development coming forward including Fishponds, Hengrove and South Bristol surrounds, Horfield, Knowle, Lawrence Hill, Southmead and St Pauls, however this is not an exhaustive list and others will be considered in due course.

1.5 Increase the priority of a defined set of under-occupiers to Band 1 (Priority 2)

The council needs to make the most effective use of the limited social housing stock available. As mentioned previously, the lack of larger properties (3-bed+) presents problems given the high demand from larger families.

Currently only under-occupiers who are under-occupying by 2 or more bedrooms are assessed to band 1 with priority being awarded on the basis that vacant possession is given when the tenant moves out.

Those under-occupying properties in high demand (fully adapted bungalows or 4-bed+ in any area) are assessed to band 2, and all other under-occupiers are assessed to band 3.

In future, we recommend that the decision to assess under-occupiers to band 1 be based on the relative importance of the stock to be released and the ability to put the property to better use more rapidly by facilitating a faster exit.

We recommend that the following be assessed to band 1:

- Under-occupiers of all houses and level access accommodation,
- Under-occupiers of 3-bed maisonettes and flats

1.6 Consolidate all categories of homelessness to band 2 (Priority 2)

Please refer to APPENDIX A3 Homelessness Data Insights

The council has additional duties relating to homelessness (known as the Prevention and Relief duties). These are in addition to and ahead of the main (full) homelessness duty. In the current Bristol HomeChoice scheme, homelessness cases are split between Band 2 (for main duty cases) and

Band 3 (homelessness prevention and homelessness relief duties).

In Leeds the Housing Allocations Policy awards the same level of priority for re-housing to applicants owed the prevention, relief and main duty. This is seen to be a contributory factor to people presenting early (at the prevention duty stage) and consequently low temporary accommodation numbers.

(The ratio of households in temporary accommodation per 1000 households in Leeds is 0.28 versus 4.73 in Bristol and 9.23 in Birmingham)

Combining homelessness cases to a single priority band was also a recommendation from the Homelessness Advice & Support Team (DLUHC).

We believe that the current approach does not encourage residents to approach the council early in their homeless situation due to the lower level of priority awarded at the prevention duty stage. It may also be having the unintended consequence of creating a perception that becoming actively homeless is a way to increase priority, thereby contributing to the high demand for temporary accommodation.

In addition, given affordability trends in Bristol and the circumstances of most of those in bands 1 to 3 on the housing register, it is recognised that in most cases a private rented placement does not represent a permanent solution but is rather a step on the journey to social housing.

We believe that BCC would be better served by using the private rented sector as an interim housing option that homeless applicants can use pending re-housing by a social landlord, rather than relying on temporary accommodation which is typically more expensive.

This practice has already been adopted by Leeds and Camden and adopted by Manchester in December 2022, whereby homeless applicants who accept a private rented tenancy do not lose their priority status for social re-housing.

HomeChoice Bristol does not currently permit this.

In future we recommend:

- awarding Band 2 to all homeless households owed a main, relief or prevention duty, and
- that applicants owed the prevention or relief duty who accept a private rented tenancy will not lose their Band 2 status

Where a household owed the prevention or relief duty is placed into band 2 but is subsequently found not to be owed the main (full) homelessness duty as they are found to be either non-priority need or intentionally homeless then they will lose their band 2 at the point of this decision and will revert to band 3.

Where a household owed the prevention or relief duty is placed into band 2 but are not considered to be in priority need or are subsequently found to be intentionally homeless and move to private rented accommodation, they would then be assessed based on their current circumstances and their housing need, but it is not envisaged that they would remain in band 2.

1.7 Introduce a 'new deal' for the homeless at home (Priority 2)

The current scheme does not sufficiently recognise the housing need of people who live in the home of their parents, or extended family, who are looking to move on because they already have a child or are pregnant. Being told to leave by parents, family or friends is one of the main reasons for households presenting as homeless in Bristol.

Creating a 'new deal' for people at risk of eviction from a home where they have no tenancy rights would help reduce the numbers currently in temporary accommodation. It recognises that a move into emergency accommodation may not be the most suitable solution, and while it may involve the same or a longer wait for housing, it is likely to result in a social housing outcome eventually, and more choice over where that offer is.

It is therefore recommended that applicants faced with eviction from the family home where they have no tenancy rights be allowed to join housing register:

- that they be assessed to Band 2 (equivalent priority with homelessness cases)
- that they be incentivised to stay put - provided it is safe to do so- by means of back-date if they remain in place for 6 months, and annually/ at intervals thereafter.
- That such applicants who accept a private rented tenancy as an interim solution will not lose their Band 2 status

1.8 Increase differentiation of cases with composite needs by assigning a 12-month backdate where three or more qualifying needs are present (Priority 2)

Composite need is when an applicant has more than one housing need that makes their situation worse than someone else in the same band. Factors currently taken into consideration include overcrowding, where someone's health is made worse by their accommodation, domestic violence and/or harassment.

Applicants with more than one housing need are placed in the band of their highest priority.

Including composite need allows us to make a distinction between cases in the same band.

In the current scheme we make provision for those with 2 or more qualifying needs to have their relative priority increased by backdating their time in the band by a maximum of 6 months.

In future we are recommending that those with 3 or more qualifying needs receive a 12-month backdate of their time in the band. i.e. those with 2 qualifying needs will receive a 6-month backdate, and those with 3 or more qualifying needs will receive a 12-month backdate.

1.9 Amendments to the thresholds for savings and for income (Priority 3)

In the current scheme there are 2 separate thresholds – one for savings and one for earned income. Currently, where the main and joint applicants have a combined gross annual income in excess of £40,000 per year (not including means tested benefits) they will not be allowed on HomeChoice Bristol.

Similarly, where the main and joint applicants combined have in excess of £40,000 of savings, they will not be allowed on HomeChoice Bristol.

We recognise that these amounts may not adequately reflect the relative circumstances of households on the register because earned income of £40 000 for a single individual represents a completely different circumstance from the same amount for a family with children.

When the enabling technology becomes available, we therefore recommend that the thresholds be changed as follows:

Household Composition	Single	Family
Earned Income threshold for eligibility	£30,000	£40,000
Savings threshold for eligibility	£30,000	£40,000

1.10 Place bidding restrictions on band 4 (Priority 3)

Even with major drives to build more homes or acquire property by other means, the mismatch between demand and supply is unlikely to change significantly or fast. There are currently over 9,500 households in Band 4. Based on the last two years' statistics less than 1% are likely to be allocated to housing, the majority being people who qualify for age restricted or sheltered housing.

This shows that there is currently little to no chance of being successfully housed from Band 4 and being on the register may be giving people false hope. We don't believe it is right to create a system in which people are encouraged / expected to bid when their real chance of being housed is <1%. It is therefore necessary to manage people's expectations more effectively.

It also takes significant officer time to maintain the high number of applications in Band 4 who are highly unlikely to ever be housed.

Whilst this is not a change that will be implemented until technology becomes available to manage both the restrictions and targeted messaging, it is proposed that bidding restrictions be placed on band 4.

Those who meet the age criteria in Band 4 would be able bid on sheltered or age restricted properties, or on properties that are advertised specifically as open to band 4 bidding.

This group would be sign-posted to other housing options like private rented, shared ownership, and community led housing.

They would be free to be reassessed or to reapply should their circumstances change and would be able to access additional information and resources we intend to provide on alternative housing solutions.

Limiting the interaction required in dealing with band 4 would allow more officer time to be focused on households in higher priority bands where the needs are more urgent.

Changes we are NOT making

Following the consultation and further subsequent analysis we will not be changing the following:

- Approach to retention of effective date - the rule remains that effective date is retained when going down in priority band, and reset when priority band is increased. The recommended changes to the banding of homelessness cases addresses the major issue giving rise to concerns about retention of effective date.
- Debt threshold – the current threshold of £500 will remain.

2. IMPLEMENTATION APPROACH RECOMMENDATION

A ‘Big Bang’ approach would require that changes only be introduced when the new technology is implemented (Go-live est. October 2024). Given the expectation of change that has been created as a result of the extensive engagement undertaken by this project, as well as the urgency behind a number of the recommended changes, we do not believe this delay to be advisable.

Due to this need to deliver some of the recommended changes ahead of the implementation of new technology, as well as the demanding nature of the interim solutions which require manual intervention and workarounds, it is recommended that the introduction of the changes be phased in over 12 to 18 months.

The Priority 1 changes are to be introduced with the first implementation as soon as possible after Cabinet approval. Thereafter the Service, in consultation with the Member for Housing, will decide the intervals and sequence in which the remaining Priority 2 changes will be implemented.

The Priority 3 changes and the conversion of interim solutions to fully technologically enabled solutions will be in the scope of the implementation of the new Housing Systems solution.

OTHER ACTIONS TO BE UNDERTAKEN

In addition to the recommendations for specific policy changes listed above, a number of enabling activities are to be undertaken and a number of additional improvements are being explored further.

3 Enabling Activities

3.2 Review of Partnership Agreement

The current Partnership Agreement has been in place since 2015 without review. The landlords below are the current Bristol Housing Partner landlords.

- Abri
- Brighter Places
- Bristol City Council
- Bromford
- Clarion Housing
- Curo
- Elim Housing Association
- Green Square Accord
- Guinness Hermitage
- Habinteg Housing Association Ltd
- LiveWest

- Places for People Housing Association
- Riverside Group
- Sanctuary Housing South West Ltd
- Sovereign Housing Association
- Stonewater Housing Association

A review is underway to update data, information sharing and other regulatory aspects, but also to re-align principles and operating practices between BCC and our housing partners. (Ref APPENDIX A2 HOTs BCC Housing Partnership Agreement Review 2023 01 26)

3.3 General Policy Rewrite

Apart from the policy changes recommended above, the entire policy has been rewritten to improve ease of reading and understanding. This has been achieved through:

- Changes in format and layout,
- Additional content e.g. expanded glossary of terms, additional definitions and explanatory appendices,
- Plain and simple language i.e. removing jargon and explaining any acronyms

In the case of decisions regarding additional bedroom need, further work is ongoing to refine the decision-making process. The intention is to ensure that households with children with Special Education Needs (SEN) in particular, are aware of the range of criteria that are taken into consideration when making these decisions, and that the decision-making process reflects a fully inclusive approach that considers the needs of the child as well as others in the household who may be affected. The final wording in this section of the Policy (Policy Appendix 3 point (f)) will be revised accordingly before publication.

3.4 'Housekeeping' undertaking

The efficiency of the housing register relies on the case data being as accurate, complete and up-to-date as possible.

Following the challenges created by the Covid-19 pandemic significant work has been done to bring the processing backlog that had built up back within acceptable timeframes.

A major 'house-keeping' exercise is planned to clean up the housing register with a focus on validating the details of new applicant cases in bands 1 and 2, then tenant cases in bands 1 and 2, and thereafter validating cases in lower bands and removing cases that are no longer valid. It's estimated that this could result in a reduction in active cases of up to 15%.

3.5 Downsizing Pilot

Run a 12-18 month pilot project to test different ways of extending the downsizing support offering in order to:

- access more in-demand properties by encouraging a greater number of under-occupiers to move to suitable sized premises,
- establish which incentives are most effective and what it would cost to implement these either for a period of time e.g. (until under-occupancy has been reduced to a

specific volume) or permanently (because under-occupancy rates should be managed on a longer-term basis)

4 **Other**

Over and above the process changes associated with some of the policy changes detailed in the Cabinet Paper, there are a number of other process improvements that we believe would greatly help with:

- better managing people's expectations from the start and throughout their HomeChoice journey, (improve user experience)
- equipping them with information and insights to help them demonstrate greater individual agency and not rely so heavily on Customer Service Centre/Customer Service Point and other BCC staff for support in the process (improve efficiency)
- addressing numerous issues raised by participants in the research stage of the project (improve user-friendliness)

Proposed improvements are detailed below.

- a. **Application** – Changes are being recommended to simplify, streamline and shorten the form and process making it easier to understand and complete, in line with the principles and recommendations that have been developed by a User Experience (UX) specialist from the Digitisation Team as part of the project to date. (See APPENDIX A4 Application Principles and Recommendations)

The Application form and process are totally technology dependent so these changes can only be implemented when the new technology is introduced.

- b. **Communication** – Changes are being explored to address process concerns that have been raised, prioritising the enhancement of delivery channels, and the timing, content and clarity of communication.

This includes things like adding pro-active communications (progress/ explanations/ hints and tips), introducing additional delivery channels (videos, diagrams, checklists), and signposting to alternative methods to getting housed.

- c. **Information and Guidance** – Changes are being explored to enable the provision of additional, more useful, timely and appropriate information and guidance in ways that service users can access and understand. Enhancements being considered include:
- process explanations for application, health needs, care needs, bidding, what to expect during and after allocation etc,
 - revising the Tenancy Preparedness offering, providing information on managing debt/ the legacy impacts of ASB, and
 - improving the consistency and quality of assistance provided by staff by reviewing the current HCB training approach, content and delivery.
- d. **Information / Data Insights** – Feedback from various stakeholders indicated that it would be useful for the service to improve access to information about allocations in flexible, user-friendly formats, making the data more transparent and enabling better insights for service users, staff, leadership and other interested parties through the use of new BI tools.

The ability to implement any changes under the processes above will depend on the capacity of the service and the technological capabilities required.