

## **Appendix 2 Allocations Policy On-Line Survey**

This on line survey has been developed following an extensive review of Redditch Borough Council's allocations policy which takes into account the freedoms and flexibilities made available through the Localism Act 2011. The following changes are now proposed which include:

1. The introduction of qualification criteria which will restrict access to the housing register.
2. Giving additional preference to key workers.
3. Removing points within bands and substituting with six bands that are easier to understand.
4. Adjusting the definition of overcrowding
5. Demoting some applicants into lower bands, for example; those who breach their tenancy conditions or have the resources to meet their own housing needs, or those in a reasonable preference for housing as defined in legislation but no local connection to Redditch.

You can view the proposed policy [here](#).

The Council would like to hear your views on these proposals.

### **An Overview of the Current Policy**

Currently anyone can apply for affordable housing in Redditch, but demand is very high. The Council intends to restrict access to the housing register by setting additional criteria that applicants, who are not in a reasonable preference category, will have to meet in order to be accepted on to the register.

There are currently 1300 applicants registered for housing which have been assessed based on housing need and local connection. Once assessed they placed in one of the following bands:

- Gold
- Silver
- Bronze

Applicants are further awarded points within their bands depending on their circumstances as follows:

- Residency (12 months) or parents 30 Points
- Bedroom deficiency/per room 50 Points
- Children in flat 15 Points
- Studio Flats 5 Points
- Property is Under Occupied / Per room 50 Points
- Leaving Special needs property 250 Points

Properties that become available for letting are either direct matched or advertised through Redditch Home Choice. Properties that are advertised are available for applicants to place a bid to register an interest in a property. An applicant's position on the shortlist is based upon their housing need, their connection to the area they are bidding on and their waiting time as set out in the Allocations policy.

The current policy can be viewed [here](#).

### **The Changes Proposed for the New Policy**

**Qualification Criteria:** Currently anyone can join the housing register. The Council proposes that only applicants with a significant local connection to Redditch or those with no local connection, but who fall within a category of reasonable preference as defined in the Housing Act 1996. In determining whether the household has a local connection the Council will agree a connection exists in the following circumstances;

- Where the local connection arises due to residency - applicant(s) must have lived in Redditch Borough (by choice) for a minimum period of two years or have resided in the Borough for three out of the last five years at the point of application.
- Where the local connection arises due to employment and the applicant(s) has been in permanent, paid employment in the Borough immediately prior to the application or the applicant(s) has a certified offer of employment in the Borough.
- Where the applicant(s) has a close family member living in the Borough for a minimum period of three years, immediately prior to the application.
- Has a local connection as a result of special circumstances.

Those without a reasonable preference housing need or local connection will no longer be eligible to join the register.

Local housing authorities are required to award Reasonable Preference for housing to the categories set out in the Housing Act 1996 (as amended). The statutory Reasonable Preference categories cover:

- All homeless people as defined in Part VII of the Housing Act 1996.
- People who are owed a duty under the Housing Act 1996 because they have a priority need but are intentionally homeless (under s190 (2)), because they are not in priority need and not homeless intentionally 193 (2) or because they are threatened with homelessness, in priority need and not intentionally homeless (195 (2) of the 1996 Act (or under s. 65 (2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any housing authority under s. (192 (3)).

- People occupying unsanitary, overcrowded or otherwise unsatisfactory housing.
- People who need to move on medical or welfare grounds (including grounds relating to a disability).
- People who need to move to a particular locality within the district to avoid hardship to themselves or others.

Local connection for homeless purposes will be assessed having regard to the definition of local connection contained in s.199 Housing Act 1996 (in the case of homeless applicants) and the code of guidance.

In determining permanent employment the Council will give consideration to the Local Government Association guidelines which state that this is employment other than that of a casual nature and will include zero hours contracts.

Q1a) Do you agree that the Qualification Criteria as described above be introduced?
Yes/No/Don't Know
Please write any comments here:

### **Housing Need**

It is proposed that applicant(s) wishing to join Redditch Homes Housing Register must have a housing need even if they have a local connection. This will include those applicant(s) with Reasonable Preference, those who are under occupying social housing stock and those covered by the categories outlined under the section relating to the Banding Structure. Applicant(s) not satisfying at least one of these criteria will not be registered and will be offered alternative housing options. Applicant(s) will also be offered the right to request a review of this decision.

Households considered to be in some housing need are:

- In social housing and seeking a transfer.
- Households with low level medical or welfare issues.
- Households who are suffering financial hardship.
- Households in privately rented accommodation that do not have a reasonable preference
- Households who are sharing facilities with other non-related households.

- Households residing in an institution or supported housing scheme e.g. hospital with no access to settled accommodation.
- Households who have insecurity of tenure (those in tied accommodation or lodging).
- Households that are living with family but want to live independently.
- Two separate households wanting to live as one household.
- Households eligible and interested in older people's accommodation will not need to demonstrate a local connection or a housing need.
- Households eligible and interested in shared ownership properties only.

Q2a) Do you agree with the above proposal?
Yes/No/Don't Know
If No, please explain why not here:
Q2b) Are you aware of any other groups who have some housing need that should be allowed to join the register?
Yes/No/Don't Know
If yes please give details here:

### Removing Points within Bands

The Council is aware that the current policy of bands and points is confusing and would like a more simple and transparent policy. The Council proposes to remove the points within bands criteria and replace it with 6 broad bands without points. Within each band applicants will be considered in date order.

Q3) Do you agree with the above proposal?
Yes/No/Don't know
If No – Please explain why here

### Reducing a Households Priority

Households with a reasonable preference can have their banding reduced because of their behaviour or circumstances, at any time. For example tenants who have not paid their rent, or have breached other tenancy conditions, such as anti-social behaviour, applicants who have sufficient equity or income to resolve their own

housing situation, or those who have a reasonable preference for housing (as defined in legislation) but do not meet the local connection requirements.

Q4a Do you agree that certain applicants in a reasonable preference housing need category without a local connection to Redditch Borough should have their banding reduced?

Yes/No/Don't Know

If No please explain here:

Q4b) Do you think the proposals regarding financial resources of a household income of £45k (excluding means tested benefits) or equity of £95K are appropriate thresholds above which the reduced banding is applied?

Yes/No/Don't Know

If No what do you think would be appropriate thresholds?

Q4c) Do you agree that applicants who breach their tenancy conditions such as not paying their rent or enforcement action has been taken for of anti-social behaviour should have their banding reduced?

Yes/No/Don't Know

Q4d) Do you agree that where an applicant has been awarded reasonable preference banding and refuses suitable offers or do not actively bid for suitable properties should have their banding reduced?

Yes/No/Don't Know

Please write any comments here:

Q4e) Do you agree that applicants who have deliberately worsened their circumstances should have their banding reduced. For example moving from suitable accommodation into overcrowded accommodation?

Yes/No/Don't Know

Please write any comments here:

### **Bedroom Standard**

Currently applicants are assessed as overcrowded if two children share a room. We propose that household members are not considered to be overcrowded until the oldest child's 10<sup>th</sup> birthday where two children are of the opposite sex. Children of the same sex will be expected to share a bedroom until their 16<sup>th</sup> birthday. This will make

sure the Council is prioritising families in greatest need for larger accommodation, which is in very short supply, and will also bring the policy in line with housing benefit rules which will also prevent applicants being affected by the spare room subsidy.

A senior officer within the Council may exercise discretion to increase the number of rooms an applicant requires in exceptional circumstances, for example a disabled child that requires their own room.

Q5) Do you agree with this proposed bedroom standard?

Yes/No/Don't know

Please write any comments here:

### **Community Contribution: Key Workers and those volunteering**

The Council wants to recognise those who provide key worker services to the Borough by awarding an additional six month's waiting time.

The definition of a key worker is taken from the HMRC employment manual: Nurses and other NHS staff, teachers in schools and in further education or sixth form colleges, police officer and civilian staff in police forces, prison service and probation service staff, social workers, education psychologist, planners and occupational therapists employed by local authorities, whole time junior fire officers and retained fire fighters.

The Council wants to recognise applicants who volunteer by awarding an additional six months waiting time. Applicants will need to show that they have volunteered for a minimum of 20 hours per month and for a continuous period of at least six months, at the point of application, at review and the same at the point of offer.

The Council recognises that some applicants will not be able to take up key worker or volunteering positions and will also award the additional six months waiting time to applicants who are:

- Full time carers for the disabled or elderly who have been doing so for at least 6 months and are in receipt of carers allowance (due to disability or frailty) or have a child under two years of age for whom they are the primary carer and in receipt of child benefit for that child.
- Severely disabled and unable to participate in any of the activities above where the support element of Employment Support Allowance or higher rate Disability Living Allowance/Personal Independence Payments is in payment.

Q6a Do you agree that additional preference should be given to applicants as set out above?

Yes/No/Don't know

Please write any comments here:

Q6b Are you aware of any other roles that you consider should be included in the key worker definition?

Q6c Are you aware of any other groups of people who might be unfairly disadvantaged by this proposal?

Yes/No/Don't Know

If yes – please state whom these might be and why here:

### **Change to Minimum Application Age**

Currently anyone aged 16 years or over can apply to register subject to them meeting other eligibility criteria.

The Council proposes to raise the age of registration to 18 years and over with an exception for those leaving care or where there are exceptional circumstances. Care leavers are given special consideration in order that properties can be identified in time for their 18<sup>th</sup> birthday when they would ordinarily be expected to find independent accommodation.

Q7. Do you agree that the age of registration should be raised to 18 years and over?  
Yes/No/Don't know.

If 'No' please explain why here:

Q8. –What would you consider to be an exceptional circumstance to register 16 and 17 years of age applicants?

**Thank you for completing this questionnaire can you let us know whether you are currently registered with Redditch Home Choice?**

**Are you a Resident, Registered Provider Partner, Charity or Other?**