

Committee: **Community Services Scrutiny Committee**

Date of meeting: **5<sup>th</sup> December 2019**

Report Subject: **Review of Blaenau Gwent Homes Allocation Policy**

Portfolio Holder: **Councillor Garth Collier, Deputy Leader / Executive Member Environment**

Report Submitted by: **Mark Congreve, Team Manager – Housing Solutions and Compliance**

Reporting Pathway								
Directorate Management Team	Corporate Leadership Team	Portfolio Holder / Chair	Audit Committee	Democratic Services Committee	Scrutiny Committee	Executive Committee	Council	Other (please state)
12.11.19	19.11.19	23.11.19			5.12.19	29.01.20		

1. **Purpose of the Report**

- 1.1 This report proposes policy and operational changes to the Blaenau Gwent Homes Allocation Scheme ('the Scheme') as a consequence of a recent review of the Scheme and consultation process.

2. **Scope and Background**

- 2.1 The Council, as local housing authority, has statutory obligations under the Housing Act 1996, the Homelessness Act 2002 and the Housing (Wales) Act 2014 in relation to the publication of a Housing Allocation Scheme and for ensuring equality of access to social housing for all people with a housing need. In Blaenau Gwent, since 2010 the Council's Housing Allocations Scheme has been delivered in partnership with local housing associations, through the operational mechanism of a Common Housing Register. In 2017, a Banding Scheme was introduced to the Common Housing Register and it was re-branded as 'Blaenau Gwent Homes'.
- 2.2 Blaenau Gwent Homes offers a single route through which all those seeking social housing can apply. This approach delivers significant benefits to the Council, Housing Associations and most importantly to those seeking accommodation in the areas. These benefits include simple, fair and consistent processes and efficient, co-ordinated administration. Applicants can apply online or over the telephone to join Blaenau Gwent Homes. Offers of accommodation are allocated to the person in the highest band who has waited the longest in that band. This ensures that there is transparency in the way the lettings are made.

### 3. **Present Position**

3.1 In March 2016, the Welsh Government issued a new 'Code of Guidance' for Local Authorities on the Allocation of Accommodation and Homelessness. This code provides guidance which Local Authorities must legally have regard to when exercising their functions in connection with housing allocations and the development and implementation of a Housing Allocations Scheme. The Code advises Local Authorities to review their Housing Allocations Schemes every two years to ensure compliance with the law and good practice.

3.2 As Blaenau Gwent's Housing Allocation Scheme was last reviewed in 2017 prior to implementation, it is now due to be reviewed in line with this legislative guidance. Therefore, the Common Housing Register Steering Group (which is made up of key officers from the Council, Tai Calon Community Housing, Linc Cymru, Melin Homes and United Welsh Housing Associations) was tasked with carrying out this review.

### 3.3 **Blaenau Gwent Homes Housing Allocation Scheme 2017**

#### 3.4 **Key Features of the current scheme**

3.4.1 In the Scheme, the Council must give priority for housing to certain applicants. These are:-

- People who are homeless (within the meaning of Part 2 of the Housing (Wales) Act 2014;
- People who are owed any duty by a local housing authority under Section 66, 73 or 75 of the Housing (Wales) Act 2014;
- People who are owed a duty by a local authority under Section 190 (2), 193 (2), or 95 (2) of Part VII of the Housing Act 1996 or who are occupying accommodation secured by any local authority under Section 192 (3);
- People living in poor or overcrowded housing;
- People who need to move for medical or welfare reasons;
- People who need to move to an area of Blaenau Gwent for a particular reason e.g. to look after a family member

3.5 The Scheme uses a 'banding' system whereby applicants are placed into a 'band' according to their need for a home. Each band includes applicants who have a similar level of housing.

3.6 As well as giving priority to the groups mentioned above, the Council also gives priority to other groups of people as doing so helps the Council to meet its local strategic housing priorities effectively. This includes the following:-

- Applicants who by moving will release an adapted property;
- Applicants whose child is likely to be accommodated by the local authority if re-housing is not made;

- Applicants who have been recommended to foster or adopt children and whose current accommodation is not big enough;
- Households including children who are forced to live apart owing to a lack of suitable accommodation;
- Existing tenants with no housing need who wish to move

3.7 It is the Council's responsibility to accept applications for housing and assess those applications in accordance with the Scheme in order to determine their eligibility and priority. It is the responsibility of the Housing Associations to allocate their vacant housing in accordance with the Scheme and associated Operational Guidance through Blaenau Gwent Homes. These roles and responsibilities are managed through a partnership approach.

3.8 When a property becomes void, the relevant housing association offers the property to the applicant on the top of the band to which the property is allocated.

3.9 Housing Associations are closely monitored by the Council to ensure that they are adhering to the Scheme when making offers of/allocating housing and to ensure that correct processes are followed in accordance to the Scheme.

### 3.10 **Proposed Policy Changes (Appendix 3)**

#### 3.10.1 **Quotas**

3.10.2 All Registered Social Landlords have evidenced that the percentage of allocations to be shared between the different bands as they stand are not fit for purpose and they have struggled to use the targets when making their allocations. This is due to the accommodation available not matching the needs of those in the Emergency band, Therefore, it has been determined that the percentage ratio of quotas need to change so that an applicants' priority for housing can reflect the type of accommodation available, their level of housing need and length of time spent on the waiting list. A breakdown of this current and proposed quota targets can be seen below:

<b>Band</b>	<b>Current</b>	<b>Proposed</b>
Emergency	25%	10% ↓
Gold	60%	60% ↔
Silver	10%	20% ↑
Bronze	5%	10% ↑

### 3.10.3 **Armed Forces**

- To redress the disadvantage people who have served in the British Armed Forces often face when accessing social housing, it is proposed that the effective date of registration will be reset to the date they joined the British Armed Forces.

### 3.10.4 **Adapted/Accessible Properties**

- The OTT will recommend the type of housing that the home seeker needs to resolve the urgent circumstances. All disabled applicants and adapted properties are assessed via criteria which allow applicant(s) to be matched to the most suitable type of property (A, B, C, D, E, F, U). When an adapted property becomes available to let, it is allocated to the person who needs that Level of property and who is in the highest band.
- Bungalows will be allocated according to the Level they have been assessed as (A, B, C, D, E, F) and will be allocated based on this and as per either adapted or general needs short-listing.

### 3.10.5 **Extra Care**

- Allocations were previously undertaken by the Extra Care allocations panel. However, to ensure that allocations are made in line with housing need/priority it has been decided that to ensure transparency these lettings will be undertaken in line with the Policy and processes of the Common Housing Register.

### 3.10.6 **Direct Match**

- Allows Housing Associations some flexibility in exceptional circumstances to make the best use of their housing stock. Whilst it is expected that the vast majority of general needs properties will be allocated based on the proposed Policy, there are times when the Housing Association would like to directly match a hard to let property to an applicant (e.g. Low demand area and short list has been exhausted). This will be done in exceptional circumstances and in consultation with the Council.

### 3.10.7 **Multi Agency Public Protection Arrangements (MAPPA)**

- Currently all applicants are assessed via banding for their needs. Applicant(s) are matched to the most suitable type of property subject to coming top of the band to which the property has been allocated and Probation checks have been carried out.
- A high risk applicant assessment form will need to be completed and attached to the housing application by the Registered Social Landlords on all match/offer rejections for bypass reasons.

### 3.10.8 **Immediate Move**

- Home seekers who need to move immediately due to domestic abuse, extreme violence or extreme harassment will be awarded additional preference. This includes hate crime, disability, racial, homophobic or transgender harassment and will be awarded for exceptional circumstances where there is a high risk to the tenant or their family's safety if they remain in the property/area and they therefore require an immediate move.

### 3.10.9 **Text Messaging**

- This has not been utilised previously in relation to the progression of the Home seekers housing applications. However, of 135 respondents, 70% have supported the introduction of this service.

### 3.11.10 **Non Direct Policy Changes**

- There are a number of amendments to the wording of some of the reasonable categories, which are intended to provide people with a clearer understanding of their meaning.
- A more detailed overview of the proposed policy changes and rationale for the changes is provided at **Appendix 3**.

## 4. **Options for Recommendations**

### 4.1 **Option 1**

Scrutiny Members consider the proposed policy changes to the Blaenau Gwent Homes Housing Allocation Scheme for implementation in April 2020 and recommend approval by the Executive Committee.

### 4.2 **Option 2**

Scrutiny Members do not recommend that the Executive Committee approve the proposed to the Blaenau Gwent Homes Housing Allocation Policy.

## 5.

### **Evidence of how does this topic supports the achievement of the Corporate Plan / Statutory Responsibilities / Blaenau Gwent Well-being Plan**

### 5.1

The review, consultation on and implementation of the Housing Allocation scheme will make a positive contribution towards the Council's Corporate Plan Vision of 'a County Borough that has high aspirations, is confident and promotes opportunity for all'; as it will deliver against the specific priorities of 'People - Promoting independence and positive lives for everyone and 'Place - Creating neighbourhoods where people are proud to live and work'.

5.2 It will also help the Council to meet three of the seven wellbeing goals that The Well Being of Future Generations (Wales) Act 2015' puts in place as follows:

1. A healthier Wales
2. A more equal Wales
3. A Wales of cohesive communities

5.3 The proposed changes are also consistent with the sustainable approach promoted by the Well-being of Future Generations (Wales) Act through the five ways of working:

- *Long-term* – the Housing Allocation Scheme will assist residents of Blaenau Gwent to secure long term and sustainable housing.
- *Prevention* – effective implementation of the Scheme will help to prevent people from becoming homeless. Living in good quality housing that is suitable also helps to prevent ill health.
- *Integration* – the Housing Allocation Scheme ensures that the approach to allocating housing in Blaenau Gwent is integrated with other council priorities e.g. helping people to live independently and safely.
- *Collaboration* – the Housing Allocation Scheme promotes collaboration between the Council and all Housing Associations with housing stock in the County Borough because it provides a common way of allocating all available social housing
- *Involvement* – The effective implementation of the Housing Allocation Scheme requires the involvement of the Council and its housing association partner and other third sector and statutory agencies

## 6. **Implications Against Each Option**

### 6.1 **Budget**

6.1.1 One of the questions included in the survey requested people's views on implementing a text messaging service to receive progress updates in relation to their housing application. The consultation response was positive in response to this question with 135 respondents (70%) saying 'yes' whilst 57 respondents (30%) said 'no'.

6.1.2 The cost of providing this service is expected to cost £3,000. However, it is important to note that these costs are shared between the Council and the 4 Housing Associations who are currently part of the Blaenau Gwent Homes Scheme.

## 6.2 **Risk including Mitigating Actions**

- 6.2.1 The policy has been developed to comply with the legal requirements of The Housing Act 1996 and the Homelessness Act 2002, and the Welsh Assembly Government's Code of Guidance for Local Authorities on Allocation of Accommodation and Homelessness and Housing (Wales) Act 2014.

## 6.3 **Legal**

- 6.3.1 The proposals presented in this report have been developed in accordance with the Council's statutory obligations under Part VI of the Housing Act 1996, and Part 2 of the Housing (Wales) Act 2014 and have been produced with reference to the 'Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness (2016)'.
- 6.3.2 A Housing Consultant's opinion on the proposed policy changes has however been sought to ensure compliance with the legislation and relevant case law.

## 6.4 **Human Resources**

- 6.4.1 There are no staffing implications as a result of this report.

## 7. **Performance Information and Data**

### 7.1 **Key performance data**

- 7.1.1 Since the 1<sup>st</sup> January 2019 **1257** active applicants have registered with Blaenau Gwent Homes. **65** applications have been closed (mandatory information not supplied), **7** applicants requested closure and **2** applicants were excluded from the register. On average **39** applications are received each week and **217** applicants have been housed.
- 7.1.2 To date there are **2059** active applicants registered with Blaenau Gwent Homes. In total **1077** households have been housed via the Common Housing Register since implementation in May 2017. On average applicants have waited **398** days to be housed.
- 7.1.3 The Programme Development Plan indicates that over the next two years the following units of accommodation will be delivered:
- 100 - Bryn Serth, Ebbw Vale (70 x Open market & 30 x Social Rented)
  - 277 - College Site, Ebbw Vale (Mixture of Open Market / Social Rented)
  - 23 - Greenacres, Tredegar (1 x Assisted Living / 22 x Social Rented)

- 23 - Glanfrwyd, Ebbw Vale (All Social Rented)
- 25 (Phase 4) - Gwaun Helyg, Ebbw Vale (All Social Rented)

8. **Expected outcome for the public**

- 8.1 Members of the public can be assured that the Council are consistently monitoring the allocations scheme and that the policy remains fit for purpose when assessing housing need. An Equality Impact Assessment (EqIA) has also been completed (**Appendix 4**).

9. **Involvement (consultation, engagement, participation)**

- 9.1 Consultation on the Housing Allocation Scheme was carried out over a 4 week period and ended on the 28<sup>th</sup> October 2019. The consultation analysis is presented at **Appendix 5**. A range of mediums were used to carry out the consultation to ensure as many stakeholders as possible were consulted on the proposed changes. These included:

- Blaenau Gwent Homes Website
- Blaenau Gwent CBC corporate website
- Social Media Channels
- Discussions at various forums and meetings.

- 9.1.1 194 responses to the consultation were received via an online survey and overall the feedback on the proposed changes has been very positive.

10. **Thinking for the Long term (forward planning)**

- 10.1 To ensure that the policy is presently fit for purpose prior to a further review in 2021.

11. **Preventative focus**

- 11.1 The changes to the allocation policy will ensure that people's housing needs continue to be met.

12. **Collaboration / partnership working**

- 12.1 Partnership working will with our Registered Social Landlords and collaborative working with agencies subject to partnership agreements and housing allocation policy will continue.

13. **Integration(across service areas)**

- 13.1 The review and consultation included gathering the views of many stakeholders, thus, promoting an integrated approach.



14. **EqlA (screening and identifying if full impact assessment is needed)**
- 14.1 A comprehensive Equality Impact Assessment (EqIA) screening form has been completed. This can be seen in **Appendix 4**.
15. **Monitoring Arrangements**
- 15.1 The work will be monitored through directorate performance management arrangements.

## **Appendices**

- *Appendix 1* - Current Blaenau Gwent Homes Housing Allocations Policy 2017
- *Appendix 2* - Proposed Blaenau Gwent Homes Housing Allocations Policy 2019
- *Appendix 3* - Summary of Proposed Changes
- *Appendix 4* - Equality Impact Assessment (EqIA)
- *Appendix 5* - Consultation Analysis