



Housing Management and Almshouses Sub (Community and Children's Services) Committee

Date: TUESDAY, 16 MAY 2017

Time: 2.00 pm

Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

Members: The Membership of this Sub Committee will be decided at the meeting of the Community and Children's Services Committee on 11th May 2017.

Enquiries: Julie Mayer: 020 7 332 1410
julie.mayer@cityoflondon.gov.uk

Lunch will be served in Guildhall Club at 1PM
NB: Part of this meeting could be the subject of audio or video recording

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Reports

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **ELECTION OF CHAIRMAN**
To elect a Chairman in accordance with Standing Order 29.

For Decision
4. **ELECTION OF DEPUTY CHAIRMAN**
To elect a Deputy Chairman in accordance with Standing Order 30.

For Decision
5. **MINUTES**
To approve the public minutes and non-public summary of the meeting on Monday, 16 January 2017.

For Decision
(Pages 1 - 4)
6. **SUB COMMITTEE'S TERMS OF REFERENCE AND MEMBERS ALLOCATED TO ESTATES**
Members are asked to note the Sub Committee's Terms of Reference and the Members allocated to the various estates in 2016/17, together with guidelines for allocated Members.

For Information
(Pages 5 - 10)
7. **TACKLING SOCIAL HOUSING TENANCY FRAUD**
Report of the Director of Community and Children's Services.

For Information
(Pages 11 - 20)
8. **HOUSING ESTATES - ALLOCATED MEMBERS' REPORT**
Report of the Director of Community and Children's Services.

For Information
(Pages 21 - 28)
9. **CITY OF LONDON ALMSHOUSES UPDATE**
Report of the Director of Community and Children's Services.

For Information
(Pages 29 - 30)

10. **MAIS HOUSE DECANT PROGRAMME UPDATE**
Report of the Director of Community and Children's Services.

For Decision
(Pages 31 - 50)
11. **PETS POLICY**
Report of the Director of Community and Children's Services.

For Decision
(Pages 51 - 66)
12. **COMPLAINTS POLICY**
Report of the Director of Community and Children's Services.

For Decision
(Pages 67 - 86)
13. **HOUSING ALLOCATION SCHEME 2017**
Report of the Director of Community and Children's Services.

For Decision
(Pages 87 - 174)
14. **DECENT HOMES WORKS TO PROPERTIES PREVIOUSLY OMITTED FROM PROGRAMMES (CALL-BACKS 2017-2020) - GATEWAY 3/4**
Report of the Director of Community and Children's Services.

For Decision
(Pages 175 - 184)
15. **DECENT HOMES WORKS TO AVONDALE SQUARE ESTATE (PHASE II) - GATEWAY 3/4**
Report of the Director of Community and Children's Services.

For Decision
(Pages 185 - 194)
16. **CONCRETE REPAIRS TO CULLUM WELCH HOUSE APPROVED - GATEWAY 4**
Report of the Director of Community and Children's Services.

For Decision
(Pages 195 - 210)
17. **OPTIONS APPRAISAL - PETTICOAT TOWER STAIRWELL PANELS - GATEWAY 3/4**
Report of the Director of Community and Children's Services.

For Decision
(Pages 211 - 226)

18. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
19. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
Report of the Director of Community and Children's Services.
20. **EXCLUSION OF THE PUBLIC**
MOTION - That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part I of Schedule 12A of the Local Government Act.

Part 2 - Non-Public Reports

21. **NON-PUBLIC MINUTES**
To approve the non-public minutes of the meeting held on 16 January 2017.

For Decision
(Pages 227 - 228)
22. **REPORT OF ACTION TAKEN BETWEEN MEETINGS**
Report of the Town Clerk.

For Information
(Pages 229 - 230)
23. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
24. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

HOUSING MANAGEMENT AND ALMSHOUSES SUB (COMMUNITY AND CHILDREN'S SERVICES) COMMITTEE

Monday, 16 January 2017

Minutes of the meeting of the Housing Management and Almshouses Sub (Community and Children's Services) Committee held at the Guildhall EC2 at 1.45 pm

Present

Members:

Virginia Rounding (Chairman)	John Fletcher
Ann Holmes (Deputy Chairman)	Gareth Moore
Randall Anderson	Deputy Elizabeth Rogula
Deputy John Barker	

Officers:

Philippa Sewell	-	Town Clerk's Department
Mark Jarvis	-	Chamberlain's Department
Jacque Campbell	-	Community & Children's Services Department
Amy Carter	-	Community & Children's Services Department
Simon Cribbens	-	Community & Children's Services Department
Wendy Giaccaglia	-	Community & Children's Services Department
Liam Gillespie	-	Community & Children's Services Department
Charli Glover	-	Community & Children's Services Department
Bayo Igoh	-	Community & Children's Services Department
Paul Jackson	-	Community & Children's Services Department
Adam Johnstone	-	Community & Children's Services Department
Kirsty Leitch	-	Community & Children's Services Department
Paul Murtagh	-	Community & Children's Services Department

1. APOLOGIES

Apologies were received from Deputy the Revd. Stephen Haines, Deputy Henry Jones, Deputy Catherine McGuinness, Dhruv Patel and Mark Wheatley.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

Mr Gareth Moore declared an interest in housing matters, as a tenant of Golden Lane Estate.

3. MINUTES

RESOLVED – That the public minutes and non-public summary of the meeting held on 28 November 2016 be approved as a correct record.

Matters Arising

Housing Delivery Programme – Communications Strategy

Members noted that the new Communications Manager was now in post and the arrangements for the Member/Officer working party were underway.

4. **RESIDENT COMMUNICATIONS & ENGAGEMENT STRATEGY REVIEW**

The Sub Committee considered a report of the Director of Community & Children's Services regarding the Resident Communications and Engagement Strategy which had been developed in consultation with staff and residents to continue and expand on the work of the 2014 strategy to support the shaping of the work in the Housing & Neighbourhoods department.

In response to Members' questions, officers advised that the Strategy sought to develop use of technology in addition to existing hard-copy communications and undertook to look into options for electronic notice boards.

RESOLVED – That the Resident Communications and Engagement Strategy be approved.

5. **MAIS HOUSE DECANT PROGRAMME - UPDATE**

The Sub Committee considered a report of the Director of Community & Children's Services which provided an update regarding the Mais House Decant Programme. Members noted that it was not in the Corporation's interest to defer housing applications of residents who refuse an offer or reduce their priority for rehousing. It was therefore proposed that conditions be waived for the purposes of rehousing Mais House residents under the decant programme and that where residents refuse an offer they continue to be considered for further offers in the interests of securing a satisfactory outcome. Members discussed the report and agreed that any waiver should be time-limited.

RESOLVED – That the report be noted and the conditions restricting the number of offers applicants can receive and refuse be waived for Mais House residents being rehoused under the decant programme for a period of 12 months or until planning consent was obtained (whichever occurred first).

6. **TENANCY POLICY**

The Sub Committee considered a report of the Director of Community & Children's Services proposing a Tenancy Policy for use by the Housing & Neighbourhoods department as part of the Estate Management practice. Members noted that some of the content of this policy would need updating once further detail had been received from the Government regarding the Housing and Planning Act 2016, but agreed that a public-facing document regarding these policies should be in place in advance. A Member raised a query regarding succession and officers undertook to clarify the wording in the policy prior to publication.

RESOLVED – That, subject to the clarification of some wording, the Tenancy Policy be approved.

7. **SHORT LETS (BREACH OF LEASE)**

The Sub Committee considered a report of the Director of Community & Children's Services regarding leased properties being used for short-term lets. Members discussed the options presented in the report and agreed that option two be approved, to raise awareness among residents that the City regards letting of homes in this way is a breach of lease conditions and, following any

estate management issues being identified, a staged warning and enforcement process be initiated. Whether action was initiated would be a question of fact and degree in each case. Members noted that staff training would be implemented to support this procedure.

RESOLVED – That Option Two be agreed: to raise awareness among residents that the City regards letting of homes in this way is a breach of lease conditions and, following any estate management issues being identified, a staged warning and enforcement process be initiated.

8. VOLUNTARY PAY TO STAY AND GOVERNMENT POLICY UPDATE

The Sub Committee considered a report of the Director of Community & Children's Services providing an update on the Autumn Statement 2016 with specific reference to Pay to Stay. In response to Members' queries, officers advised that a leasehold services review was being conducted, including the lease offered to ensure it was fit for purpose, and confirmed that any proposed changes would come back to this Sub Committee for consideration.

RESOLVED – That option one be approved: that the preference for social rent defined in the City Corporation's Tenancy Strategy be reaffirmed.

9. HOMES FOR LONDONERS: AFFORDABLE HOMES PROGRAMME 2016 - 2021

The Sub Committee received a report of the Director of Community & Children's Services regarding the Mayor of London's Homes for Londoners: Affordable Homes Programme 2016 – 21 funding prospectus, which sought to support the delivery of 90,000 new affordable homes.

RESOLVED – That the report be noted.

10. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE

There were no questions.

11. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

Lift Refurbishment – Middlesex Street Estate

The Sub Committee considered a late report of the Director of Community & Children's Services regarding the lift Refurbishment at Middlesex Street Estate. Members discussed the report and agreed that any costs incurred to service the newly constructed flats be met from the capital outlay and not part of the service charge levied to leaseholders.

RESOLVED – That:

- a) a change of project scope to incorporate installing additional lift stops for the two lifts in Petticoat Tower to serve flats 3a-3d be approved;
- b) the increase in total estimated budget to £1,032,500 to accommodate this additional work be noted;
- c) an additional sum of £8,000 professional fees be approved to reach Gateway 5; and

- d) any costs incurred to service the newly constructed flats be met from the capital outlay and not part of the service charge levied to leaseholders.

Royal British Legion Poppy Appeal

Officers reported that over £5,000 had been raised and Members congratulated all staff involved. Members also took the opportunity to welcome Bayo Igoh, the new Head of Estates.

12. EXCLUSION OF THE PUBLIC

RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

Item	Paragraph
13-14	3
15-16	-

13. NON-PUBLIC MINUTES

RESOLVED – That, subject to the correction of a typo, the non-public minutes of the meeting held on 28 November 2016 be approved as a correct record.

14. FORMER TENANT ARREARS - PROPOSAL TO WRITE OFF UNRECOVERABLE DEBTS

The Sub Committee considered a report of the Director of Community & Children's Services.

15. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE

There were no non-public questions.

16. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There was no other business.

The meeting closed at 2.44 pm

Chairman

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HOUSING MANAGEMENT & ALMSHOUSES SUB COMMITTEE

Constitution

- 8 Members to be elected by the Community & Children's Services Committee, including the Chairman and Deputy Chairman.
- It is convention for the Chairman and Deputy Chairman of the Grand Committee to be appointed to this Sub Committee as ex-officio Committee Members.

In accordance with Standing Order Nos. 29 & 30, no Member who is resident in, or a tenant of, any property owned by the City of London and under the control of this Sub Committee is eligible to be Chairman or Deputy Chairman.

Quorum

Any three Members.

Terms of Reference

To be responsible for:-

- (a) discharging the City of London Corporation's function in respect of the management of its existing social housing stock (with the Grand Committee retaining responsibility over policies affecting the City's Strategic Housing responsibilities);
- (b) approving schemes affecting the City's existing social housing and proposed stock in accordance with the policies and strategies for investment agreed by the Grand Committee and having regard to the City Corporation's Project Approval Procedure;
- (c) approve policies in relation to the management of housing services to tenants and leaseholders in City estates and review them as necessary;
- (d) the management of the City of London Almshouses (registered charity no 1005857) in accordance with the charity's governing instruments; and
- (d) advising the Grand Committee on:-
 - the general performance of the Social Housing Service and the Almshouses; and
 - its recommendations concerning the Allocation Scheme in the City's Housing Registration process.

MEMBERS ALLOCATED TO ESTATES LIST
List for 2016/17

ESTATE	ALLOCATED MEMBER & PHONE NUMBER
Avondale Square (Southwark)	Virginia Rounding
Small Estates: Dron House/Spitalfields (Tower Hamlets); Isleden House (Islington); Windsor House (Hackney)	Elizabeth Rogula
Golden Lane (City)	Gareth Moore (Ward Member) Deputy John Barker (Ward Member)
Holloway & York Way (Islington)	Deputy Catherine McGuinness Barbara Newman Deputy Michael Welbank
Middlesex Street (City)	Deputy Henry Jones (Ward Member)
South Bank Estates: Southwark Blocks (Southwark) William Blake (Lambeth)	Randall Anderson
Sheltered Schemes & Almshouses: Harman Close (Southwark); Mais House (Lewisham); City of London & Gresham Almshouses (Lambeth)	Mark Wheatley Ann Holmes
Sydenham Hill: Lammas Green/Otto Close (Lewisham)	Mark Wheatley

Community & Children's Services Housing Service

Guidelines for Allocated Members

1. Background

- 1.1 The Allocated Members Scheme matches Members from the Community & Children's Services Committee to each of the City's social housing estates. There are eight Allocated Member positions, with some covering more than one small estates. It is possible for more than one Members to share the Allocated Member role on a large estate if they wish to do so.
- 1.2 The purpose of the Scheme is to:
 - Give residents and staff a named Member to 'champion' their estate;
 - Allow Members to take an interest in the estate, its residents and staff;
 - Develop a group of members with housing knowledge & experience to contribute to the CC&S Committee.
- 1.3 Allocated Members are appointed each year by the Chairman of the Housing Management Sub-Committee.

2. Role of the Allocated Member

- 2.1 The Allocated Member exists to champion the estate and its whole community, covering staff and all residents. This involves:
 - Making occasional visits to the estate and attending some events, to ensure familiarity with the estate, its residents and staff.
 - Promoting the interests of the estate within the City – raising its profile by drawing attention to new developments, initiatives and good practice.
 - Liaising with other departments, outside agencies, and home local authorities over matters which are of concern to the whole estate community. For example, a general rise in anti-social behaviour, affecting many residents on an estate might be helped by the involvement of the Allocated Member, working with managers, to encourage intervention from the police or home borough.
- 2.2 Allocated Members exist to champion the whole estate community, not the interests or issues of individual residents. If an individual attempts to raise an issue with an Allocated Member, they should be referred to local staff or managers. If the matter is a complaint, the resident must be referred to the formal complaints process.

Managers and staff cannot discuss individual residents with Allocated Members, for confidentiality reasons. Allocated Members should not normally meet privately with residents, or visit them in their homes, unless part of a formal visit with managers. The Allocated Member Scheme is not a forum through which residents can seek to challenge management decisions, and it is not appropriate for residents to request this of the Allocated Member, thus putting them in a difficult position.

- 2.3 There is a clear difference between the role of a Ward Member and that of an Allocated Member. A Ward Member has a democratic responsibility for protecting the interests of residents in his/her ward, and can, therefore, take up a matter with officers on behalf of an individual. Residents outside the City will have their own ward councillors whom they have elected to represent them, and who, therefore, can take up an issue on their behalf.

Allocated Members, however, have not been elected as democratic representatives, and, therefore, officers cannot discuss individual issues or complaints with them. The Allocated Member is selected to represent the estate as a whole, not individuals.

- 2.4 If an individual raises a personal issue with an Allocated Member, the Member will either:
- a) give the resident details of the appropriate local manager so that they can contact them, or
 - b) bring the matter to the attention of the local manager and ask them to contact the resident direct in order to resolve the issue through proper processes.

3. Responsibilities of Allocated Members

- 3.1 An Allocated Member makes an initial commitment to a familiarisation visit to the estate, to be shown around and to meet staff.
- 3.2 Following the familiarisation visit, the Allocated Member is expected to visit the estate on two occasions during the year. One of these occasions will be a formal estate walkabout, organised by the Area Manager and open to residents to take part. The other visit may be an informal one, or might be to attend the Annual General Meeting of a recognised Residents' Association, to chair an estate meeting, or to be at a social event for all residents.
- 3.3 Further visits to the estate are at the discretion of the Allocated Member. The Area Housing Manager should always be informed, as a matter of courtesy, when the Allocated Member proposes to visit the estate.
- 3.4 Officers will prepare a six-monthly report on activities on the estate and will circulate this to Allocated Members for comment in advance of it being presented to the Housing Sub-Committee, and referred to the Grand Committee. Allocated Members should be prepared to answer questions on any matter included in the estate at the appropriate Committee meeting.

3.5 The contact details for Allocated Members will be displayed on notices on the estate and in relevant publications. From time to time, Allocated Members may be asked to contribute a piece for the estate newsletter or other publication.

4. Support for Allocated Members

4.1 The Area Housing Manager responsible for an estate will contact the Allocated Member at least on a quarterly basis to discuss issues and activities on the estate.

4.2 The Area Housing Manager will also e-mail the Allocated Member at the end of each month with a short update on estate matters.

4.3 The Area Housing Manager will also contact the Allocated Member if there are any significant issues on the estate, over and above those which are purely management matters. Examples might be an emergency situation on the estate such as a fire, flood or major crime.

4.4 Allocated Members will be informed about forthcoming estate events as so as these are arranged, and will be given the dates of estate walkabouts at least six months in advance.

4.5 Briefing events will be held for Allocated Members at appropriate times. These might be to discuss matters of national housing policy and how they affect estates, or to talk about a general issue.

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Committee	Dated:
Housing Management & Almshouses Sub-Committee	16/05/2017
Subject: Tackling Social Housing Tenancy Fraud	Public
Report of: Director of Community & Children's Services Report author: Chris Keesing, Anti-fraud Manager	For Information

Summary

This report provides Members with an overview of the work undertaken by the Chamberlain's Anti-Fraud team to tackle social housing tenancy fraud during the 2016/17 reporting year.

In total 31 investigations have been successfully completed, identifying nine housing application frauds, five right to by frauds and seventeen tenancy frauds, where the property had been unlawfully sub-let or obtained by deception. The associated value of social housing tenancy fraud identified by the team during 2016/17 amounts to £983,000.

The seventeen tenancy fraud properties referred to above have all been recovered by the City and have now been re-let to provide safe, secure and affordable housing to those in greater need.

Two successful social housing tenancy fraud prosecutions have been concluded at the Central Criminal Court during 2016/17, demonstrating our commitment to taking the most robust action against those that seek to defraud the City of London and deprive much sought after housing to those in genuine need.

A joint proactive exercise with the Home Office Immigration Enforcement Team, designed to identify no recourse to public funds fraud has resulted in 71 matches of potential fraud for review, whilst a proactive social housing tenancy fraud data-matching exercise, which has matched tenant data against credit reference agency data, has identified over 200 matches for review.

A City of London case study has been used by the Cabinet Office to highlight the successes achieved in implementing the NFI AppCheck solution to identify fraud at point of application for housing, providing positive publicity for the City Corporation.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. This report provides Members with details of the City's response to social housing tenancy fraud during the 2016/17 reporting year. It also provides details of successful prosecution action and properties recovered under civil proceedings, along with our response to housing application fraud and right to buy fraud. Likewise details of our joint working and proactive initiatives to identify and tackle social housing tenancy fraud have been provided for information.

Social Housing Tenancy Fraud

2. Social Housing Tenancy Fraud continues to be a key fraud risk area; the Anti-Fraud & Investigation Team, part of the Chamberlain's Internal Audit section, continues to provide investigative support across all aspects of Housing, from initial applications, to the investigation of tenancy breaches and right to buy concerns. The associated value of identified social housing tenancy fraud for 2016/17 amounts to £983,000; details of our work to date in this area are summarised in Appendix 1 to this report, whilst a summary of successfully concluded cases is noted in the table below.

Discipline	Completed Investigations 2016/17 to Date	Investigation Value (£'s) 2016/17 to Date
Social Housing Tenancy Fraud – Property Recovered	17	270,000
Right to Buy - Fraud Identified	5	515,000
Housing Application - Fraud Identified	9	126,000
Total	31	£983,000

Successful possession gained/housing application fraud value of £18,000 per property sourced from Audit Commission value of national average temporary accommodation costs to Local Authorities for one family. RTB discount valued at £103,000, per property.

3. Two successful social housing tenancy fraud prosecutions have been secured this reporting year, along with a further 17 fraudulently obtained or sublet properties recovered via civil court action or having been directly recovered from the registered tenants as a direct result of our investigations. Four further cases are currently subject to criminal proceedings and are with the Comptroller and City Solicitor for action.
4. A summary of the two cases successfully prosecuted at the Central Criminal Court in June 2016 and July 2016, along with three highlighted social housing tenancy fraud investigations, where successful recovery has been recently secured are detailed below:

Prosecutions

- I. Jenis Ifill – a City of London social housing tenant since 2012 used counterfeit Home Office leave to remain documents to obtain social housing and housing benefit from the City of London. Ms Ifill was found guilty at the Central Criminal Court on 16 June 2016, following a ten day trial, of one charge of possessing a false identity document with improper intention, contrary to the Identity and Documents Act 2010, and four charges of dishonestly making a false representation to obtain council housing and housing benefits, contrary to the Fraud Act 2006. Ms Ifill was sentenced to fifteen months imprisonment for all charges, to run concurrently. A short report on the outcome of the case was published in the London Evening Standard on 20 June 2016, and also featured in the September 2016 quarterly housing newsletter, delivered to all City of London housing tenants. Civil action was successful in recovering the property.
- II. Fatima Garba – a City of London social housing tenant for over ten years, dishonestly sub-let her social housing property for profit. Ms Garba was found guilty at the Central Criminal Court on 18 July 2016, following a three day trial, of four charges of dishonestly making a false representation on social housing tenancy forms, contrary to the Fraud Act 2006. Ms Garba will be sentenced in September. The tenancy has already been recovered and is now let to a family in greater need.

Highlighted Recovered Cases

- III. Pakeman House tenancy – following a referral from the City's Rents Officer, who had concerns that the tenant was sub-letting the property, we commenced an investigation which identified that the property was being occupied by two previously unknown persons, whilst the registered tenant was residing in the USA. Having identified contact information for the tenant in the USA, contact was made and it was established that the tenant was not intending to return to the UK. We were, however, successful in recovering the property after the tenant agreed to voluntarily return possession and repay rent areas of £1,000, saving considerable legal costs and court costs and mitigating the risk of high rent areas.
- IV. Penfields House tenancy – following a referral from a York Way Estates Officer, who had concerns that the property was being sub-let, we commenced an investigation which identified that the registered tenant was residing at a property he had owned since 2009, whilst sub-letting the City of London tenancy to another person. We formally interviewed the tenant under caution, but established that he suffered from mental health problems and in light of this, a decision was made not to progress to criminal prosecution. We were, however, successful in recovering the property from the tenant, with the sub-tenant leaving the property and all rent arrears paid without the need to take civil action, again saving considerable legal costs and court costs and mitigating the risk of high rent areas.

- V. Centre Point tenancy – following a referral from an Avondale Square Estate Officer, who had concerns that the registered tenant was abroad and other persons were residing at the property, we commenced an investigation which identified that the registered tenant was residing in Canada. We established that the tenant had obtained the tenancy in 2003 whilst living in the UK, and had returned to Canada to live with his wife; however, the tenant allowed another person to reside at the property as a sub-tenant, who was paying the rent, Council tax and utility bills. Being unable to interview the tenant under caution as he was not in the country, civil action commenced to recover the tenancy and the City was subsequently awarded possession.
5. In all of the above, the tenancies have now been re-let to those in greater need of housing, whilst successful prosecutions are publicised as a deterrent exercise in-line with our Social Housing Fraud – Anti-Fraud & Prosecution Policy.

Housing Allocations

6. The Anti-Fraud team continue to support and work closely with the Housing Allocations team, in order to identify fraud from the outset and mitigate the risk of social housing being provided to those that have furnished fraudulent and/or misleading information in attempts to secure social housing from the City of London. In order to achieve this, we have introduced further measures including the introduction of an additional verification process, through a system called NFI AppCheck. The NFI AppCheck allows the City to verify whether applicants have interest in social housing elsewhere in the country, to verify addresses provided in some instances, and to establish if applicants are on Council waiting lists elsewhere. A further measure recently introduced allows the Housing Allocations Manager to undertake checks against credit reference agency data, thereby allowing the verification, or not, of personal, financial, and address history information provided by the housing applicant.

Case Study

7. The Cabinet Office recently used the City of London Corporation in a case study, following our successful implementation of the NFI AppCheck service to identify housing application fraud at the point of application. The case study demonstrates our successes and outcomes in using this tool to check application data against data held by other local authorities, to identify fraud and inconsistencies, and provides positive publicity for The City's anti-fraud work in this area. The case study can be found at Appendix 2 to this report.

Proactive Anti-Fraud Activity

8. The volume of pro-active anti-fraud activity undertaken by the Anti-Fraud team, in relation to social housing fraud has reduced in 2016/17, owing to the volume of, and increase in, reactive investigations; however, two key proactive fraud drives continue to progress around our reactive work, with a summary of activity provided below.

Joint Home Office/City of London Fraud Drive

9. A proactive fraud drive with the Home Office Immigration Enforcement Team that seeks to identify no recourse to public funds concerns across our housing estates is progressing well. The exercise matches City of London social housing tenant data against Home Office data in order to establish if property has been obtained where the tenant has no right to it, owing to their immigration status. The Anti-Fraud team are in the process of reviewing 71 matches, highlighted by the data-matching where further investigation is required to review documents and information supplied by tenants, during their housing application, with support from the Home Office Immigration Enforcement Team.

Credit Reference Agency Data-Matching Fraud Drive

10. A proactive social housing tenancy fraud drive that seeks to identify dishonest housing applications and illegal sub-letting, by matching tenant data against credit reference agency data, has identified over 200 matches. Such matches may indicate that tenants have owned property before obtaining social housing, meaning that they had no entitlement to housing with the City of London, whilst other matches may indicate that persons other than the tenant is residing at the property, suggesting sub-letting. Fifteen percent of the matches, all being high risk, are currently subject to review and/or investigation to establish whether fraud has been committed.
11. Any successful cases originating from these exercises will be included in our housing tenancy fraud statistics, as provided in Appendix 1 to this report.

Whistleblowing

12. The City of London Corporation undertakes periodic publicity campaigns to raise awareness with residents and the public that they are able to report suspected cases of tenancy fraud (anonymously if they wish). A dedicated fraud hotline and email address, maintained by the Anti-Fraud & Investigation team is in place to enable reporting of concerns; likewise the City's Whistleblowing Policy provides an alternative avenue for reporting concerns directly to the City of London.

Conclusion

13. The City of London Corporation has a joined up approach to tackling social housing tenancy fraud. During 2016/17, a total of thirty one successfully concluded investigations have returned seventeen social housing tenancies that were either obtained by deception or were being fraudulently sub-let, whilst nine fraudulent housing applications were detected and cancelled, and five fraudulent right to buy applications identified. Two serious cases were successfully prosecuted in the Central Criminal Court, resulting in custodial sentences for both, and demonstrating our commitment to taking the most robust action against those that seek to defraud the City of London and deprive much sought after housing to those in genuine need. Positive publicity has been generated from a recent case study involving the City's participation

in the NFI AppCheck system, whilst our joint working and proactive initiatives continue to yield positive outcomes.

Appendices

- Appendix 1: Analysis of cases investigated during the 2016/17 reporting year
- Appendix 2: City of London Case Study

Contact

Chris Keesing, Anti-Fraud Manager

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Appendix 1 – Housing Tenancy Fraud Caseload as at 20/03/2017

Housing Tenancy Fraud Case Referrals	April 2016 to March 2017	April 2015 to March 2016
Housing tenancy fraud referrals received in current year	51	58
Right to buy referrals received in current year	40	10
Housing application referrals (Inc. NFI Appcheck) received in current year	74	43
Home purchase grant referrals received in current year	0	3
Cases carried forward from previous year (all disciplines)	44	14
Total	209	128
Cases/Referrals currently under investigation		
Cases/referrals currently under investigation	23	44
Cases/referrals closed with no further action ¹	143	53
Cases with Comptroller & City Solicitor for prosecution	4	4
Cases with Comptroller & City Solicitor for civil recovery	3	1
Cases where possession order granted	3	0
Cases where successful possession gained ²	17	15
Cases where successful prosecution action taken	2	0
Cases where fraudulent application identified	9	10
Right to buy fraud successfully identified	5	1
Total	209	128
Value where successful possession gained, housing application cancelled or right to buy fraud identified³		
	£983,000	£553,000
Notes:		
¹ The number of cases/referrals closed with no further action include housing application AppCheck referrals, where a large number are expected to proceed, following review. These closed referrals amount to 65 for 2016/17 YTD.		
² Cases where successful possession has been gained will be considered for criminal action where suitable, and where offences committed are serious enough to warrant proceedings under the Prevention of Social Housing Fraud Act 2013 and/ or the Fraud Act 2006.		
³ Successful possession gained value of £18,000 per property sourced from Audit Commission value of national average temporary accommodation costs to Local Authorities for one family. RTB discount value currently £103,000, per property.		

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Cabinet Office



AppCheck

CASE STUDY: APPCHECK TRIAL RESULTS IN £180,000 SAVING FOR CITY OF LONDON CORPORATION ANTI-FRAUD AND INVESTIGATION TEAM

The City of London Corporation recently agreed to trial the National Fraud Initiative (NFI) AppCheck fraud prevention solution to help them address a growing problem of fraud in social housing applications.

The City of London Corporation is the local authority for the 'square mile' in the heart of London and the city's Housing Department is responsible for the allocation of social housing it owns and manages, across seven different London Boroughs. With the number of people requiring social housing growing exponentially in recent times the pressure on the department to ensure that housing stock is only allocated to those with a genuine entitlement is huge.



The Situation

The City Corporation’s Anti-Fraud Investigation Team along with the Housing Allocations Team are tasked with working together across London to detect, prevent and deter people from seeking to obtain social housing under false pretences. As the need for social housing increases so too does the incidence of those seeking to obtain housing fraudulently. In addition the sophistication and range of fraud being committed to evade detection is also becoming more complex. As part of its commitment to supporting the National Fraud Initiative (NFI) from the Cabinet Office, and to help evolve its approach to fraud prevention, the City Corporation decided to deploy AppCheck on a trial basis to see if it could help to improve its ability to identify those applying, or who have obtained, social housing under false pretences.

Solution

As AppCheck is a web based solution that leverages the intelligence of the National Fraud Initiative database, deploying the solution across all the stakeholders involved was incredibly easy and no IT or systems deployments were needed. Initially the City Corporation purchased a number of AppCheck Credits to perform searches on housing applications that were going through their system at the time. The AppCheck system was easily assimilated into the teams existing processes and provided an additional layer of intelligence to the verification process, as well as highlighting immigration issues to the City Corporation of those applying to be housed.

RESULTS

The results of the trial were significant right from the start. As part of the investigation activity, that resulted from intelligence provided by AppCheck during the initial trial phase, the City Corporation were able to identify several fraudulent applications that were subsequently cancelled, where dishonest information had been provided in attempts to obtain social housing.



Incredibly easy and simple to integrate within existing processes



Resulted in identifying over £180,000 worth of fraud during the trial



AppCheck now been rolled out as part of teams operational processes



Team now assessing other areas for rolling out AppCheck to other departments

Chris Keesing, Anti-Fraud Manager within the City of London Corporation commented on the AppCheck trial:

“The trial of the AppCheck solution was a great success that proved itself very early on by allowing us to identify fraud that would have otherwise potentially not been detected. Such was the success that we quickly agreed to release funds to purchase sufficient AppCheck search credits to roll out the AppCheck solution as part of the normal verification activities of the team. Since the solution was introduced we have stopped ten properties from being fraudulently obtained as a direct result of the intelligence that AppCheck has provided. The solution has proved itself to be a cost effective and positive assurance tool that helps us to protect the public purse, and stop fraudulent applications at source. Our next steps are to assess how we can deploy AppCheck across other areas within the Authority to help us combat fraud.”

If your organisation would like to take advantage of the intelligence that AppCheck provides to help prevent fraud from impacting your budgets, then contact:



Committee	Dated:
Housing Management & Almshouses Sub-Committee	16/05/17
Subject: Housing Estates – Allocated Members’ Report	Public
Report of: Director of Community & Children’s Services	For Information
Report author: Wendy Giaccaglia, Area Manager, Out-of-City Estates	

Summary

This report, which is for information, provides an update for the Committee on events and activities on the City of London Corporation’s social housing estates.

The report is compiled in collaboration with Allocated Members, whose role is to take an active interest in their estate, to champion residents and local staff and to engage with housing issues in order to play an informed part in housing-related debates within the Committee.

Recommendation

Members are asked to note the report.

Main Report

Background

1. The Allocated Members Scheme was introduced in 2000, when Members of the Community & Children’s Services Committee were allocated to different City of London Corporation housing estates. This report is presented to the Housing Management Sub-Committee twice a year.

General Estate Matters

2. Resident Celebration Day was held on 11 March 2017 in the Livery Hall. Residents from almost every estate attended and participated in workshops and enjoyed entertainment organised by residents. Officers and residents look forward to this day every year, and moving the timing to the spring instead of the autumn has been well-received.

3. We were delighted to receive a Highly Commended at the finals of the Local Government Chronicle Awards in March for our community involvement work. The LGC awards are the most prestigious national awards in the local government world, and, as this is the first time we have entered, we were very happy to be finalists.
4. We also entered the Tenant Participation & Advisory Service (TPAS) awards for the first time this year. Five of our entries reached the final of the regional awards in February, and we were thrilled when our work with Avondale Community Events was announced the winner of the award for Excellence in Community Action.

Avondale Square Estate : Officer Report – Shaun Thurston, Estate Manager

5. We are pleased to report that Twelve Acres House has opened. It comprises 18 new flats, a Community Centre and an Estate Office. I am pleased to report that all 18 flats have been let and the residents are settling in well. The Estate Office is now a welcoming place for residents and contractors, and the Community Centre is hosting a range of activities, from birthday parties to baby showers, and table top sales to karate classes. The Community Centre is so popular, in fact, it is booked out through June, and bookings have been taken over the Christmas period too. Not only is this creating better community cohesion, it is raising income for the estate.
6. There have been some changes in staff on the estate, with Charlotte Gliniecki moving to become Customer Service Officer at Middlesex Street. Suman Hassain, who has been working as Customer Service Officer for York Way Estate, has replaced Charlotte.
7. As mentioned above, we were thrilled when Avondale Community Events (ACE) was recognised by TPAS – the country's leading organisation for resident engagement and community work. During an awards event at Wembley, ACE picked up the Excellence in Community Action Award, which highlighted their achievements in organising community- led activities and classes which have been enjoyed by local residents over the past two years.
8. The first Residents' Open Meeting at the new Community Centre took place in January and was attended by nearly 40 residents, which was the best turn out in years. As stated in the last report, residents have expressed some concern with an increase in Anti-Social Behaviour (ASB) in the square, which is situated in the middle of the estate. Our estate team has been working closely with the local Police team to combat this problem. We are hoping the incidences of ASB will decrease once the CCTV is installed in the square in the coming weeks.
9. We would like to thank Virginia Rounding, the former Allocated Member for the Avondale Square Estate, for her support and her interest in the estate over the years. We wish her well on her future endeavours.

Small Estates (Dron House, Isleden House and Windsor House) – Allocated Member, Deputy Elizabeth Rogula

10. I am in regular contact with Estate Manager, Angela Smith, and her team to discuss issues relating to the three housing estates.
11. Residents of Windsor House welcomed the news of the Decent Homes project for the replacement of kitchens and bathrooms, which will commence in July 2017. The Estate office at Windsor House will also receive a long awaited refurbishment, which will improve the general appearance of the office. It is envisaged this will happen towards the end of April. I am also pleased to report, that a personal trainer who lives in Windsor House will run Keep Fit exercise classes at the community centre from May.
12. The electrical and smoke detector testing of tenanted properties, along with the installation of carbon monoxide monitors were carried out at Dron House in April. The same programme will be carried out in Windsor House and Isleden House in August 2017.
13. Islington Council have granted us Planning Permission for the development of three properties at Isleden House. This project will now go out to tender.
14. Estate Officer, Matthew Ring, and the residents of Dron House held a Winter Party in December in the Community Centre. The residents who attended said that they enjoyed the party.
15. Matthew Ring, Estate Officer for Dron House, has successfully secured a promotion to Middlesex Street Estate as the Senior Estate Officer. I would like to congratulate Matthew for his hard work and dedication to the smooth running of Dron House, and wish him great success in his new role.

Golden Lane: Officer Report - Laurence Jones, Estate Manager

16. The Great Arthur House Curtain Wall project is progressing, despite a number of issues which have been well-documented. Work on the west elevation is now complete. Residents were able to view one of the completed flats, and were pleased with the finishing. We have continued to keep residents informed through regular newsletters and bulletins.
17. There is a full programme for lift modernisation work across the estate, which has now commenced. Both lifts in Great Arthur House have already been refurbished, with work to modernise the lifts in Basterfield and Hatfield Houses underway. Residents are being kept up to date on progress.
18. The Community Centre is due to close towards the end of June 2017 in order that refurbishment work can be undertaken. In March, 26 residents attended a workshop to discuss detailed designs and propose comments. The design proposals were well-received and we received positive suggestions on

improvements to the redevelopment. We will continue to work with the residents group and keep the wider estate informed of progress.

19. Residents thoroughly enjoyed having a float in the Lord Mayor's Show in November. This was made possible partly through the City and partly through commercial sponsorship secured by Allocated Member Gareth Moore. The design and creation of the float and participation in the show was a wonderful way for the residents to come together and celebrate their community.
20. A programme has begun for the renewal of approximately 120 central heating boilers across the estate. These boilers are being replaced after determining that they have either reached the end, or are approaching the end, of their useful life. The new boilers have greater efficiency, both in gas and energy. The work is being carried out by TSG Building Services. Work should be completed in September 2017.
21. Our Customer Services Officer, Fazilia Siddiqui, has now been with us for four months. Faz has settled in extremely well and is already held in high esteem by residents, staff and contractors alike. She is an important and valued member of the Golden Lane Team.
22. Resident drop-in sessions continue to be a success, and more so due to the level of work on-going across the estate. Residents are given the opportunity to fully engage in discussions about estate projects and community development work on a one-to-one basis. The next estate walkabout is scheduled for 11 July 2017. The next drop-in will be on 18 July 2017.
23. Estate staff would like to thank Gareth Moore and Deputy Barker for the support they have given over the years as Allocated Members.

Holloway & York Way Estates – Allocated Members, Deputy Catherine McGuinness, Michael Welbank, MBE and Barbara Newman, CBE

24. Deputy Catherine McGuinness met with new Estate Manager Greg Nott to see how he is settling into the role and to discuss what his focus points are for the future. One of the points highlighted was the aim to further continue work on community based projects and events to help build a greater community experience for all residents.
25. Resident Meetings were held on both estates in March. The format for the meetings was to hold drop-in sessions to provide residents with the opportunity for one-to-one discussions with the team of their choice to be able to talk about things that matter to them. Officers from teams including projects and repairs, homeownership, Parkguard Neighbourhood Patrol Service, estate management and LB Islington Energy Advice were in attendance for both meetings, providing a varied agenda for the residents.

26. Estate manager, Greg Nott, is currently looking into various improvements for the estates, and one of the areas that has been identified and prioritised is the refurbishment of the community hall toilet facilities, which have needed improvement for some time. This is now moving along as a minor project and should be approved to start in the near future.
27. The Holloway Estate Garden Project is still live, but had to pause through the winter months. The first stage was a success, with Estate Officer, Harper Ozkulac, working alongside residents to build planters and lay out the initial plan. Work has resumed now that the weather has improved. Estate Manager, Greg Nott, is in contact with the funding officer for the project to have the final funds released, and the gardening group are working successfully with local amenities to source donated plants and materials.

Middlesex Street Estate – Allocated Member, Deputy Henry Jones

28. Following the departure of Paul Richardson, there is a new Estate Team, led by Estate Manager, Michelle Warman. Matt Ring is the new Estate Officer, and Charlotte Gliniecki is the new Customer Services Officer. They have brought an improved customer-focused approach to residents.
29. Officers are looking at options for an Estate Office that is more accessible to residents. There are currently three options being considered to improve access to Estate Officers. In the meantime, the Estate Manager is planning 'meet and greet' opportunities on the Podium now that the weather is nice as an alternative, due to lack of facilities in the Library.
30. The Residents' Open Meeting held on 15th February was very well attended, and followed the drop-in format that most of the City Estates are adopting, as it is a more productive way of engaging with residents.
31. The Recycling team are working closely with estate staff to increase the level of recycling by residents. They are replacing the information stickers on refuse chutes, and delivered information leaflets and recycling bags to every address. They are also planning an open event with the estate team to encourage recycling and to educate residents about contaminated refuse. Recently, the team supported the Estate Manager with a delicate situation involving a hoarder on the estate, and were able to remove a substantial amount of newspapers. It was an excellent example of joint working with the two teams, the resident and her support worker.
32. The survey for the glass panels on Petticoat Tower has been completed and this has been incorporated with planned works to replace the current design of panels for a safer and resistant design. The scaffolding will remain until the work has been completed.

33. The Landscaping project to improve Artizan Street outside Petticoat Tower began in April. The groundwork and concrete testing has been completed, and once the final details of the design have been agreed, the works can commence.
34. Art Night London are working with the Estate Team and Library staff to facilitate various arts and crafts workshops for women and open evenings, including a wine and cheese event to encourage residents to get involved with the consultation and design of a mural, which will be on the original staircase into the Estate facing Petticoat Lane. The library has sourced some sewing machines for them to use.
35. Tesco Funding, managed by Groundworks, is providing a £10,000 grant for Podium Improvement Project, which includes an outdoor gym and improvements to the ball court. This is a resident-led project, with the funds being managed by the Estate Team.
36. The Estate Manager will be arranging a resident meeting to focus on the Estate Security. Other partners attending this meeting are Outreach, Police and Parkguard to ensure residents are able to ask questions, and for both residents and the Estate team to put a process in place to deal with the on-going issues with the rough sleepers, drug misuse and drug dealing in and around the estate. It is intended that this meeting will be educational, informative and have a plan drafted for joint enterprise with the Estate Team and residents with the Police and Parkguard.

Southbank Estates – Allocated Member, Randall Anderson

37. A successful meeting was held for residents at a new venue, Blackfriars settlement, in October 2016. There was a high turn out from the residents and their feedback about the bright, airy building with modern facilities was very positive. The April Open meeting was held there as a result.
38. A group of residents at William Blake Estate organised a Christmas get together at a local restaurant in December 2016. The purpose was to encourage residents to get to know each other/and forge community spirit with the ultimate goal of setting up a Residents' Association.
39. The Estate Manager hosted a "Coffee with a Copper" morning at William Blake Estate in February. Residents appreciated the opportunity to enjoy a cup of tea or coffee and informally discuss local crime and anti-social behaviour issues with the local Police Community Support Officers and Police Constable. A follow up coffee morning was arranged for April 2017 as a result of its success.
40. Work to install the new lift at Lynton Mansions was completed in January 2017. The one resident who had to be decanted during the works has now settled back into her home and was very satisfied with the way her move was organised. The lift renewal project then moved to St James Mansion where

two residents had to be decanted for the duration of works. These residents will have moved back into their flats in early April.

41. Residents at William Blake Estate have been in discussion with officers about having electronic gates installed at the entrances to the estate following some concerns about anti-social behaviour. A formal consultation will commence after legalities over public rights of way are clarified.
42. The gardening club at William Blake Estate has been resurrected for the spring with planned gardening dates to be announced.
43. The Residents' Association at Collinson Court organised another successful Pancake Day Mardi Gras party on 28th February 2017. It was a collaborative event this year, as the Mint Street Music Festival Team also helped organise the event.
44. The Southwark Mediation Service is currently working on improving relations between residents and staff at Horace Jones House and the managing agents at One Tower Bridge.
45. Staff changes at Southbank Estates have included the appointment of Okeino Hibbert as Estate Officer at Sumner Buildings.

Sydenham Hill Estate – Allocated Member, Mark Wheatley

46. An informal drop in session was held for residents in January in the Community Hall at Lammas Green. As well as City of London officers in attendance to answer residents' enquiries, a guest speaker from SHINE also attended. This organisation works in partnership with the City of London to assist our residents on a wide range of issues that can affect wellbeing.
47. Residents received advice and leaflets on how to tackle fuel poverty and reduce seasonal ailments and hospital admissions.
48. The gardening contract went out for re-tender, and Walworth Garden has won the contract for two more years. This is good news for residents, who have been very happy with their work.

Sheltered Housing – Allocated Members, Ann Holmes and Mark Wheatley

49. We have been in contact with Jacqueline Whitmore, Sheltered Housing Manager and met team members during the year.
50. The decant of Mais House residents continues, many having moved to new homes with the support of dedicated staff and services offered, with each resident's move "tailor made" for their needs. There are currently 26 residents left at Mais House. Housing staff and Project Lead, Paul Jackson, are liaising with London Borough of Lewisham housing officers for suitable accommodation for residents who wish to remain in the Borough. Many of the

residents who have already moved remain as City residents, mainly moving to Harman Close and City of London Almshouses.

51. Site surveys to review the land available on the Mais House estate have been undertaken as part of the planning process, and all residents will be invited to make suggestions on the type of homes to be built on the site with emphasis on Lifetime homes.
52. Work on the garden at Harman Close, undertaken by Groundworks as part of the Tesco Bags of Help, is almost complete. The Scheme Manager, Carl Newbold, applied for a grant last year and was successful in receiving the highest award of £10,000. Residents are looking forward to growing their own vegetables in newly created raised beds and are very pleased with the new landscaping undertaken.
53. Under the Decent Homes project, work to replace the heating at Harman Close will be undertaken during the summer, which will provide residents with more efficient heating in their homes and reduce energy costs.
54. Isleden House sheltered residents are looking forward to the creation of an outside gym in the garden. This project is being undertaken with Fusion, who is providing technical expertise and will assist residents in the use of the equipment. Residents will be able to undertake exercise on equipment specially designed to keep them mobile and active in a private setting. Although some of the vegetable garden space has been used for the gym area, raised beds have been created to make it easier for the keen gardeners to continue growing their favourite summer vegetables.

Background Papers

This report was compiled in consultation with the Allocated Members, managers and staff of the City of London's housing estates.

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Committee Housing Management & Almshouses Sub-Committee	Dated: 16 05 2017
Subject: City of London Almshouses Update	Public
Report of: Director of Community & Children's Services	For Information
Report author: Jacqueline Whitmore, Sheltered Housing Manager	

Summary

This report gives Members an information update on the City of London Almshouses, in Lambeth. Some of the information in the report also relates to the eight Gresham Almshouses on the estate.

Recommendation

Members are asked to note the report.

Main Report

Background

1. In February 2013 the City of London Almshouses Trustees Committee was merged with the Housing Management Sub-Committee to form the Housing Management & Almshouses Sub-Committee. This report is presented to alternate meetings of the Sub-Committee. It updates Members on operational matters relating to the Almshouses and their residents, and highlights any issues of concern, particularly where funding is required, which is additional to the current year's budget.

Current Position

2. Waiting List

As part of the Decant programme at Mais House, several residents expressed an interest in moving to City of London Almshouses. Five residents from Mais House have moved to the Almshouses and are very happy in their new homes.

Mais House residents have been given priority for the past year, but there are no further Mais House residents currently expressing a preference for an Almshouse, so other people on the waiting list can now be considered. There are currently three people on the waiting list. Officers will be contacting the applicants to ascertain their current requirements and offer vacant properties as they occur.

3. Communal Garden

The Almshouses Manager has surveyed residents with plans for the communal garden at the rear of the community hall. Residents have made suggestions on

planting and layout which have been incorporated into the design. Contractors will be engaged to undertake much of the work after quotes have been submitted.

4. Social activities

Residents were very happy with their Christmas Hampers, and extend their thanks and appreciation to Trustees for this annual gift. The Almshouses Manager, Tracy Taylor has arranged social activities this year including a Murder Mystery Night and coffee mornings. She is encouraging residents to get more involved in running social events. Tracy is also planning a Wellbeing event for late Spring and a summer event in the garden which Members will be invited to attend.

5. Estate meetings

Officers continue to work with Southwark Mediation Centre in engaging with residents to participate in estate events and improve relationships on the estate. At a recent meeting, several residents requested that we review the Pet Policy at the Almshouses, as many would like to have an indoor cat. A survey has been sent to all residents to establish the demand for change overall. If residents vote to have up to two indoor cats, this would reflect the Pet Policy currently in force in HRA general needs properties.

6. Refurbishment Programme

Officers have met with the Major Works Delivery Team to discuss plans for refurbishing the estate. Your Sub-Committee agreed a refurbishment programme for the current financial year. Surveyors have visited every home and noted individual property requirements. These vary - for instance, some properties have already had new kitchen units installed when vacant. Officers and project staff agree that it is important to appoint a Clerk of Works to monitor work and liaise with residents for the duration of the project. Resident consultation will begin once final plans are available.

It is estimated that the work will take approximately 6 months. Contractors will work on four flats simultaneously, to maintain the work flow. Scaffolding will be required for roof repairs. Officers will work with residents to minimise any possible problems with contractors being given access to homes.

Preparation work before the work can start will include full asbestos testing and CCTV drain inspections. These will enable a detailed report to be presented to Members once the work plan and full costs have been finalised.

7. Rent Arrears

The current arrears have reduced since our last report. The majority of debt still relates to one resident. Other arrears noted are low level amounts which are being managed by the Income Recovery Officer.

Jacqueline Whitmore
Sheltered Housing Manager

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Committee	Dated:
Housing Management and Almshouses Sub- Committee	16 May 2017
Subject: Mais House Decant Programme - Update	Public
Report of: Director of Community and Children’s Services	For Decision
Report author: Paul Jackson – Department of Community and Children’s Services	

Summary

This report is in two parts. Part A provides an update for information on the decant programme currently underway at the Corporation’s sheltered housing scheme at Mais House. Part B sets out situations in which some residents may be considered to be financially disadvantaged as a result of being rehoused under the decant programme and asks Members to decide whether additional payments may need to be offered by way of compensation.

Part A - Update on the decant programme

The decision to redevelop the sheltered housing scheme at Mais House was made by Members at a meeting of the Community and Children’s Committee on 16 January 2016. The decanting of the scheme (ie the rehousing of all residents) began in May 2016. Part A of this report notes rehousing activity between December 2016 and April 2017 and the current status.

There were 52 occupied flats at Mais House at the start of the decant programme. Since the last report 13 units were vacated. The current number of occupied units is now 25.

Part B - Residents financially disadvantaged by the decant programme.

A Decant Policy, setting out the arrangements for financial compensation and other payments to residents of Mais House to ensure compliance with the Land Compensation Act 1972 was approved at a meeting of your Sub-committee on 25 April 2016.

Members considered the policy and the report, receiving clarification that all Mais House residents would be eligible to receive a statutory Home Loss payment. Members sought, and were given, assurance that residents would not be financially disadvantaged in the longer term. Officers stated that any further measures needed would be brought back to Members for approval at a later date.

Recommendation

Members are asked to:

- note the update report in Part A of the main report;
- approve the recommendation in paragraph 22 of Part B of the main report.

Main Report

Part A – Update on the decant programme

Background

1. Mais House is a sheltered housing scheme located on the City's Sydenham Hill estate in Lewisham. In 2014, the Community & Children's Services Committee made a decision that the City's aspiration for the future would be to build 'Lifetime Homes' suitable for older residents, on all estates. Your committee identified Mais House as being the existing sheltered scheme which was in the worst condition and, due to its location, in low demand and therefore asked for Phase 2 of the Sheltered Housing review to look at options for Mais House.
2. In January 2016, your Committee received the Phase 2 report. This identified a number of issues, including the fact that there is an over-supply of sheltered housing in Lewisham. Members considered options and decided that Mais House would be closed and redeveloped as general needs housing. This decision required officers to commence a decant programme for Mais House, working with residents to identify suitable new homes and to support them through a move.
3. A major programme of work and support was put into place, with residents given intensive support to identify their needs and wishes, every effort being made to find homes to meet those, and a generous package of compensation and expenses being provided. The decanting of Mais House began in May 2016. It was agreed to bring regular progress reports on the decant programme to the Housing Management and Almshouses Sub- Committee. This is the fifth report and reflects activity between December 2016 and April 2017.
4. A majority of residents have expressed a preference for the City to continue as their landlord, and to be rehoused within our social rented stock, either in sheltered or general needs accommodation. It has largely been possible to rehouse these residents. Other residents wish to be rehoused in areas in which we do not have any social rented housing. This will require the cooperation of other housing providers in the social rented and charitable sector if we are to meet these requirements.
5. Officers have established reciprocal rehousing agreements with LB Lewisham and the LB Greenwich to try to meet some of the demand and have also rehoused some residents with a housing association. Officers have also held exploratory discussions with a large charitable provider of a newly-developed scheme at St Clement Heights in Sydenham. Although the City has no nomination or reciprocal agreements with this provider officers have written to all residents offering assistance should they wish to register an interest in it.

Current Position – rehousing activity in this period and cumulative totals

6. There are 62 units at Mais house. Thirty-eight were occupied at the end of the last reporting period (November 2016). Since then 13 more properties have been vacated. A summary of the total number of vacated units and occupancy levels at end of April 2017 is shown in the table below.

Occupied units at start of programme - May 2016	Total number of vacated units at the end of Nov 2016	Occupied units at the end of April 2017
52	27	25

7. Rehousing activity has been greater than usual in recent months. This is due to several factors:
- a higher than average number of vacancies at the City's other sheltered schemes;
 - newly developed properties at the Avondale estate becoming available;
 - the rehousing of some tenants through other social housing providers.
8. This rate of movement is not expected to be sustained. Most residents wishing to stay in City properties have now been accommodated, and we will need to find homes through other landlords for the other residents. The rate at which properties become vacant at Mais House is therefore expected to slow through the remainder of 2017.
9. We are extremely pleased to report that feedback from residents who have moved has been very positive. A number of residents have told us that they are pleased with the level of support provided, and that they are happy in their new homes. One former Mais House resident recently spoke at the Residents' Celebration day, saying that she had dreaded the move, but was now delighted with her new home and estate.

Part B - Financial compensation for Mais House residents under the decant scheme

Background

10. The Land Compensation Act 1973 provides for compensation and other financial assistance to be paid to residents as a result of being required to leave their accommodation. These payments have a fixed purpose and definition: home loss payments are made by way of compensation for the loss of home and associated inconvenience; disturbance payments are made to meet the reasonable costs incurred in moving. A decant policy for Mais House setting out the Corporation's arrangements to comply with these statutory requirements was adopted by your Sub-committee in April 2016. The amount of statutory home loss payment payable currently stands at £5,800.
11. At that meeting Members sought, and were given, assurance that no resident would be financially disadvantaged in the longer term as a result of having to move. Officers stated that any further measures needed would be brought back to Members for approval at a later date. Since that time a number of residents have sought clarification about this assurance with regard to the accommodation charges they are, or will be, required to pay at their new home.
12. It is not possible to forecast the precise financial impact of moving into a higher-rent property or a property in another local authority area where council tax may be higher prior to moving. Residents have to make fresh claims and declarations of income and savings to the local authority in respect of housing and council tax benefit at the point at which they move. Eligibility for these benefits can vary dependent not only on income and savings but also on the composition of the accommodation charge for the new property and local rules for calculating council tax.
13. Residents who receive full housing benefit are unlikely to be worse off as a result of moving, as their benefits will increase to cover all increased costs. Those in receipt of partial housing benefit may have to pay more in council tax if their new borough charges more. Residents who do not receive housing benefit but are 'self-funders' may find that they do have to pay an increase in accommodation charges and council tax.

Current position

14. The majority of Mais House residents were in receipt of full or partial housing benefit. To date we are not aware of any resident in this category who has been financially disadvantaged in any way by the move.
15. Thirteen residents at Mais House were not in receipt of housing benefit. Nine of these have now been rehoused in City properties and six have incurred increased accommodation charges of between £3 to £12 per week. For the four remaining residents it is likely that accommodation will have to be sought through other social housing providers. If so, the increase in overall weekly charge for these residents is likely to be higher than those noted above. One resident

recently refused a suitable offer from a social housing provider, which he would have otherwise been likely to accept, on account of a weekly charge around £40 more than he is currently paying. This outcome is likely to recur if there are similar differences in accommodation charges from other providers.

16. Given that the City is working with residents to try to achieve mutually satisfactory housing solutions for Mais House residents as far as possible on a voluntary basis, we would not enforce acceptance of such offers for these residents. The potential for rehousing some of our residents through these providers would therefore be lost. Ultimately, this could mean that those residents have to accept a City property, regardless of their own wishes.
17. Members are asked to consider the following to address the situation noted above.

Options

18. In view of the assurance sought by Members, it is considered appropriate at this stage to make some provision for self-funding residents who are faced with increases in their overall weekly accommodation charges from their own finances. Officers have analysed the position and believe there are two options.
19. Option 1 - It is proposed that the City meet the full difference of any increase in accommodation charge incurred as a result of a move from Mais house for the full length of the tenancy. For the six residents already rehoused this will cost a total of approximately £2,800 a year. If the remaining four residents were also to be rehoused in similar City property with similar accommodation charges it is estimated that the overall annual cost of this option would total approximately £5,500 per year. However this option would require residents to move into City properties only, regardless of their preference.
20. Option2 - Alternatively, Members may wish to enable the remaining four residents to have the option of rehousing with other providers which better meets their preferences by providing financial assistance to meet any higher rents or charges irrespective of their landlord. The table below shows the estimated total annual cost of a range of possible cash payments up to a maximum of £40 per week including the rebates proposed for those residents who have already moved.

Amount of extra payment per week	Max annual total (4 residents)	Rebates for residents already moved	Total annual cost
£20	£4,160	£2,800	£6,960
£30	£6,240	£2,800	£9,040
£40	£8,320	£2,800	£11,120

This option would broaden the potential supply of suitable housing likely to meet the area preferences of remaining residents and be more likely to avoid the necessity of enforcing offers of suitable accommodation in the event of refusal.

21. For either option the ongoing costs would be borne by the HRA, offset by the increase in rental revenue from additional, newly developed homes on the site of Mais House. For City tenants, rebates in charges would be applied through credits to their rent account. For those residents accepting tenancies with other social providers, provision would be made through quarterly cash payments in arrears direct to the resident. Proof of rent and continued occupation would be required on a regular basis.

Recommendation

22. Members are recommended to approve Option 2 and give officers delegated authority to offer financial assistance to residents receiving offers of accommodation from other providers, up to a maximum of £40 per week, where charges for that accommodation exceed current charges at Mais House.

Corporate & Strategic Implications

23. The redevelopment of Mais House is a key objective in the Community & Children's Services Business Plan and contributes to the delivery of Strategic Priority 4 - *Supporting homes and communities: Developing strong neighbourhoods and ensuring people have a decent place to live.*

24. The development will contribute to the corporate commitment that the City will build 700 new homes on Housing Revenue Account land within the next 10 years.

Appendix

Decant Policy for Social Housing Secure Tenants

Background Papers

Decant Policy – Sheltered Housing Review Part 2.

Paul Jackson

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Decant Policy for Social Housing Secure Tenants

Department of Community and Children's Services

City of London Corporation**Decant Policy for Social housing Secure Tenants**

Document status:	Draft
Prepared by:	Paul Jackson
Reviewed by:	JC
Owner:	Jacquie Campbell
Approved by:	Housing Management & Almshouses Sub-Committee
Implementation date:	25 April 2016 (subject to approval)
Review date:	+ 12 months
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Policy overview

This decant policy sets out the Corporation's approach to managing the rehousing of residents when it is necessary to move residents from their existing home into temporary or permanent alternative accommodation or in order to facilitate modernisation or redevelopment works. This process is known as decanting.

The policy applies only to housing stock of which the Corporation is the landlord and only to the decanting of residents who are secure tenants of the Corporation to enable modernisation, redevelopment or demolition programmes to take place. It will not apply in cases of compulsory purchase orders, emergency repair or the undertaking of work to housing stock with residents in occupation. Separate policy requirements will apply in these instances.

The policy outlines arrangements for the rehousing and financial compensation of residents in line with the Corporation's allocation policy and legal requirements in order to deliver vacant possession of affected properties and ensure effective use of public funds. The policy provides for estate-specific plans to be applied to decant requirements where necessary to meet the particular needs and circumstances of individual estates and works programmes.

Responsibility for decanting and rehousing affected residents lies with the Corporation although rehousing into another housing provider's property is permissible subject to a satisfactory match with residents' needs and their agreement.

The policy aims to ensure no person will receive less favourable treatment on the grounds of race, gender, religion, belief, age, sexual orientation, physical disability, appearance, and economic or marital status.

The policy will apply once the appropriate Committee has decided to proceed with a modernisation, redevelopment or demolition scheme proposal and will be implemented through a dedicated decant programme. Consultation with affected residents will be carried out prior to the Committee's consideration of the proposal. Consultation will continue throughout the decant programme where appropriate on the detail of the modernisation or redevelopment programme.

The decant programme

A decant programme will commence once a Committee decision has been made to proceed with a proposal for a modernisation or redevelopment scheme. The decant programme will manage the rehousing of residents where their home is to be redeveloped or substantially modernised to the extent that they are unable to remain in occupation whilst work takes place.

Decant programmes will be scheme-specific. The approach to decanting will take into account scheme proposals, works requirements, residents' choices to be rehoused temporarily or permanently, and residents' rehousing needs and preferences. Decant programmes will be underpinned by a housing needs survey of all affected residents and households and, for new or redevelopment schemes, a lettings plan where appropriate.

Programmes will be managed by dedicated officers who will manage communication and consultation with residents and provide the first point of contact for advice and support for all households affected by the decanting programme.

Decanting arrangements – scheme types and residents rights

The approach to decanting properties will depend on the type and requirements of the scheme proposals and the rehousing rights and choices of residents during the programme once works are completed. In some programmes, such as modernisation works, it may be possible to rehouse residents temporarily pending a move back to their substantive home; in others, such as a redevelopment, residents may be required to move, temporarily or permanently, with the option of an offer to return to a newly redeveloped property accommodation on the new scheme where possible. Whilst there is no legal requirement to allow residents to return to properties in a redeveloped site, the Corporation is committed to allowing residents who wish to return to be given priority to do so subject to availability of suitable properties which meet the identified needs and requirements of their household. Local lettings plans may be applied to the letting of new or redeveloped properties units to facilitate this.

On large estates with multiple blocks decanting may be phased to meet the requirements of the works programme.

Modernisation or refurbishment schemes – in these schemes the shell of existing properties may be retained making it possible for residents to move temporarily and return to their substantive home upon completion of works. In these cases residents will:

- retain the tenancy of their existing substantive home
- move temporarily with a licence to occupy their temporary decant property
- pay the lower of the two property rents during the period of the works
- have the right to return to their substantive home upon completion of the work.

Demolition and redevelopment schemes – in these schemes it will not be possible for residents to return to their existing, substantive homes. In these cases residents will:

- in the case of demolition be offered suitable permanent alternative accommodation
- in the case of redevelopment schemes, either
 - move permanently into one of the newly developed properties where suitable properties become available prior to the need to decant sites or
 - be offered suitable permanent accommodation and retain the option of an offer of accommodation on the new scheme where possible.

Local lettings plans

For redevelopment schemes, a local letting plan will identify the potential for residents to return and will govern the allocation of newly developed properties. The lettings plan will identify residents who wish to return. It will set out letting criteria to ensure qualifying residents are allocated first opportunity of rehousing into the new properties subject to availability of properties which meet the identified needs and requirements of their household. In the event of insufficient numbers of suitable properties the letting plan will set out criteria for determining priority. These will include local connection and length of residence.

Housing needs survey

A housing needs survey of the affected site will be undertaken to inform the decant programme and identify the scale and nature of the overall rehousing requirement. All residents will be offered a visit or interview to assess their individual households' rehousing needs, preferences and support requirements, and determine their eligibility for help with rehousing and financial compensation. A decant rehousing application will be created for each eligible household and all applications will be registered on the Corporation's housing register.

Household details will be updated periodically throughout the duration of the programme and further visits will be undertaken prior to rehousing to check requirements and enable claims for financial compensation.

Eligibility – qualifications and exclusions

The following residents will be eligible for rehousing and assistance:

- tenants living in affected property 12 months prior to the date of the Committee decision to proceed with the proposed scheme
- family members including children living with the tenant at the property 12 months prior to the date of the Committee decision to proceed with the proposed scheme
- partners and spouses living with the tenant 12 months prior to the date of the Committee decision to proceed with the proposed scheme.

Proof that residents meet the eligibility criteria may be required. The Corporation will not rehouse unauthorised occupants, sub-tenants, lodgers, licensees, children of the tenant whose main or principal home is elsewhere, or other non-secure occupants.

Housing needs assessment and size of accommodation

The size of alternative property to be offered will depend on the number and age of eligible household members and the size of their current property at the time of the move. This will be determined using the Corporation's allocation policy in the first instance. Additional properties or smaller or larger properties than that currently occupied may be allocated in line with the allocation policy or where the housing need survey identifies a need.

Hidden households (separate households within a known household, for example an adult child of the tenant living in the property with a spouse, partner and/or one or more children) and non-dependent adults will be offered the option of separate accommodation which meets their housing need, subject to meeting the eligibility criteria set out above.

Households under-occupying their current accommodation will generally be offered accommodation that meets their current need, except in certain circumstances where accommodation providing one bedroom more than the household's identified needs may be offered. This will be at the Corporation's discretion and will normally apply on health grounds as assessed by the Corporation's medical adviser.

Single person households over the age of forty-five occupying a studio flat will be eligible for a one bedroom property. Single person households occupying a one bedroom property will be eligible for a one bedroom property. It is not expected that these households would be rehoused into a studio flat unless on a voluntary basis.

Under-occupying households and single-person households in one bedroom accommodation who move into smaller accommodation (ie a studio flat) will qualify for additional financial compensation under the Corporation's shift allowance for tenants who downsize. Under this policy, single person households over the age of forty-five occupying a studio flat who would be eligible for a one bedroom flat will also qualify for the shift allowance if they accept an offer of a studio flat. Current rates for the shift allowance are shown at Appendix 1 (see pages 10-11).

Where necessary, estate-specific decant plans will allow flexibility and discretion to adapt requirements to the particular needs and circumstances of individual estates and works programmes.

Offers of accommodation

Offers of accommodation will be made following the completion of the housing needs survey and the assessment of individual residents' and their households' requirements, including medical assessments where necessary. Residents will be notified in writing of the size of property they are entitled to, their priority for rehousing, and their stated preferences for rehousing. They will also be notified of

their right to return to their substantive property where applicable or the option of an offer of accommodation on the new scheme or redevelopment where possible. Offers will meet the reasonable needs of residents as assessed from information provided at the time of application and/or held on tenancy records. The Corporation will make every effort to meet residents' preferences but this cannot be guaranteed.

Priority for rehousing

Priority for offers of rehousing will be awarded in line with the Corporation's allocation policy in the first instance. Residents requiring rehousing as part of a decant programme will be awarded points equivalent to the category of management move. Additional points may be awarded for medical needs or welfare needs as determined by the allocation policy.

Bidding for properties

Residents in a decant programme will be eligible to bid for suitable alternative accommodation, including properties available through other registered providers (such as housing associations) through the Corporation's choice-based lettings scheme, for a period up to 12 months prior to the scheduled site vacation date, subject to the requirements of individual works programmes. Any alterations to this period will be publicised. Advice and support will be given to residents who may also wish to seek accommodation in the private sector or to purchase on the open market.

The Corporation will notify decanting households who are still on the housing register within three months of the scheduled site vacation date. The Corporation may award discretionary priority to these households. Once the bidding period has closed the Corporation will make an offer of suitable alternative accommodation directly to qualifying households.

Direct offers

For households in specialist housing or sheltered housing, households requiring mobility category properties, or households otherwise unable to use the bidding system, offers of suitable alternative accommodation will be made directly. The Corporation will make every effort to ensure offers meet the reasonable requirements of households and residents will normally be expected to accept the first reasonable offer which meets their housing need. Additional provision, such as aids and adaptations, and support during the move will be offered where appropriate to ensure offers meet households' identified needs.

Tenancies

Residents moving within the Corporation's own housing stock will be given new tenancies when they are decanted (unless they are moving on a temporary basis, in which case they will be granted a licence and retain the existing tenancy of their substantive tenancies pending their return). These will be for the same term as the tenancy currently held ie if a lifetime tenancy the new tenancy will be a lifetime tenancy. Tenure may change if residents opt to move to another housing provider.

For example, housing associations generally offer accommodation on assured tenancies; in some instances these may be offered as a fixed term tenancy. Residents opting to do this will be advised about any change in their tenure or conditions of tenancy prior to accepting offers.

Support for vulnerable households

The Corporation is committed to supporting residents who may be vulnerable because of age, disability, or other medical problems or conditions. The Corporation will provide extra support to residents who need it when they are moving home. This will include:

- accompanied viewings of properties,
- liaison with health and care providers and new housing managers or providers,
- practical help and advice with arrangements for:
 - furniture removal
 - disconnection and reconnection of appliances,
 - provision of aids and adaptations
 - decoration allowances, and
 - assistance in claiming home loss and disturbance payments.

Refusal of offers

The Corporation is committed to moving households on a voluntary basis through mutual agreement where possible. Every effort will be made to ensure suitable alternative accommodation which meets the reasonable needs and preferences of households is offered. Legal action to gain possession of tenanted properties will be a last resort. In the event of refusal of a final offer of suitable alternative accommodation, the Director of Community & Children's Services, under the Scheme of Delegation, will decide on the reasonableness of the offer of accommodation. Where final offers are considered reasonable the Corporation will apply for possession proceedings to secure vacant possession and allow work programmes to proceed.

Compensation and financial assistance for displaced residents

The Corporation is committed to compensating residents for the loss of their home and the reasonable costs incurred in moving. The Land Compensation Act 1973 provides for statutory home loss and disturbance payments to be made to residents (named tenants) displaced as a result of demolition or a programme of modernisation or redevelopment work.

Home loss payments

Home loss payments are paid to compensate eligible tenants, as defined above, who are required either to move permanently from their home as a consequence of demolition and/or redevelopment works, or to move temporarily and return subsequently to a newly developed home. Home loss will not be payable to tenants who are able to return to their substantive home following work.

Home loss payments are payable once only, against the property. Payments will therefore be divided between joint tenants. Payments are subject to maximum and minimum thresholds and annual review by Government. As at October 2015 home loss payments for tenants are set at £5,300. Payments made by the Corporation under this policy will be reviewed regularly to ensure they meet the required statutory level.

Tenants will be required to claim for a home loss payment. Guidance about how to claim will be provided to tenants at the time of their move. Claims will be accepted up to 6 years after the date of removal and will be paid within 3 months of receiving the claim. The Corporation reserves the right to offset rent arrears or other debts owed to the Corporation against home loss payments.

Disturbance payments

Disturbance payments are paid to compensate eligible tenants, as defined above, for reasonable expenses incurred in moving where they are required to move permanently from their home as a consequence of demolition and/or redevelopment works. Where tenants are required to move twice, for example where they are rehoused temporarily before returning to either their substantive home or a newly modernised or redeveloped home, disturbance payments will be paid twice.

The following expenses are considered to be standard and will normally be met by a disturbance payment:

- cost of removals
- disconnection and reconnection charges for domestic appliances, telephone lines and extensions and television aerials or satellite dishes
- cost of redirection of post for up to 3 months
- cost of refitting or replacement of existing carpets, curtains and blinds up to a maximum.

Other costs may be eligible for reimbursement including, but not limited to:

- re-provision or refitting of disability aids and adaptations for special needs
- refitting security alarms or other security equipment
- costs of redecoration where decoration to temporary or permanent accommodation has not been carried out by the Corporation.

Removal and associated costs eligible for disturbance payments are set out in more detail in Appendix 1.

Compensation for authorised improvements by tenants to existing properties will be paid under the Corporation's existing policy. Properties will be inspected prior to moving out to agree compensation for improvements and the amount of refitting or replacement work required as part of the disturbance payments.

Claims and reimbursement arrangements

The Corporation is committed to ensuring that residents are not unduly inconvenienced or left out of pocket as a consequence of having to leave their home and that public funds are used fairly and effectively in reimbursing legitimate costs.

The Corporation also wishes to ensure that residents are supported in choosing how best to arrange their move. Arrangements for the work associated with removals and the reimbursement of expenses may be undertaken as follows.

Residents who wish to minimise the financial outlay required to move before claiming reimbursement may opt to use Corporation-approved contractors to undertake removals, carpet and curtain refitting/replacement and disconnection/reconnection of domestic appliances to agreed levels and costs. In these instances the associated costs will be met and paid directly by the Corporation. Claims for additional items as listed in Appendix 1 will require written quotations for approval by the Corporation before proceeding.

Residents wishing to use their own contractors will need to submit written quotations for work for approval by the Corporation before proceeding. Claims will be assessed to determine the reasonableness of the expense incurred. Following approval tenants may instruct their chosen contractor and on completion of the work should submit receipts for payment to the Council who will reimburse the approved cost within 14 working days.

Alternatively, where residents wish to undertake the removal and other associated work themselves, they may claim and accept a flat rate disturbance payment in lieu of a claim for items deemed as standard (see Disturbance Payments, page 8). This payment would be made on confirmation that the tenant has accepted in writing an offer of suitable alternative accommodation and the tenancy is expected to start within the following 14 days. The claim for a flat rate payment claim for standard items will be considered by the Corporation to be pre-approved. It will not be necessary for residents to submit estimates or receipts although tenants will be expected to make all necessary removal arrangements and other provision themselves. The acceptance of this payment would not prevent claims for additional items such as the refitting of security alarms or showers other reasonable expenditure for which written quotations would be required prior to the work being authorised.

Further details about these options and levels of payment are set out in Appendix (see pages 11-12).

Discretionary payments

The Corporation may, exceptionally, exercise discretion to provide compensation or financial assistance where tenants are not legally eligible for home loss payments or incur costs beyond those set out in this policy. Where applicable this assistance will be defined as part of a scheme-specific decant and works programme and claims will be considered on a case-by-case basis. These discretionary payments cases will not be subject to appeal.

Appeals and complaints

An appeal against any aspect of this policy or decision made under it will be treated as a complaint and dealt with in accordance with the Corporation's complaints policy and procedure.

Appendix 1

Table 1
Schedule of disturbance payments

1.	Removal costs	To include packing/unpacking for vulnerable/older tenants where approved
2.	Redirection of mail	For three months
3.	Disconnection and reconnection of domestic appliances	Cooker, dishwasher, washing machine. Must be undertaken by industry approved tradesperson
4.	Disconnection and reconnection of telephone line, broadband, satellite dishes, aerials	
5.	Carpets, floor covering	Uplift, alteration and refitting of existing or disposal and replacement to Corporation-approved standard
6.	Curtains, curtain tracks, blinds	Alteration and refitting of existing or replacement to Corporation-approved standard
7.	Redecoration	Allowance or redecoration to approved re-let standards where Corporation is the landlord. Allowance for non-Corporation properties subject to deduction of any landlord decoration allowance
8.	Security devices	Special or additional alarms, locks where fitted by tenant
9.	Aids and adaptations	To be refitted/re-provided where previously approved by the Corporation; allowance or reimbursement for same where provided by the tenant subject to proof or approval of costs
10.	Fitted furniture	Dismantling and refitting of wardrobes and kitchens where provided by tenant
11.	Other home improvements	Compensation and reimbursement as per existing policy
12.	Sheds, garden furniture	Dismantling and reassembly; reimbursement for loss or replacement
13.	Loss of earnings	For up to two eligible members of household. Written proof required
14.	School uniforms	Where change of school required
15.	Storage	For temporary decants only
16.	Other	Other exceptional or special costs may be considered and approved by the Corporation

Table 2Flat rate disturbance allowance – rates of payment

Flat rate disturbance payments are payable for items 1 to 6 as set out in Table 1 of this Appendix. Current rates are set out below. Rates will be subject to review.

Size of Property	Flat rate allowance
Studio	£1145
One bedroom	£1545
Two bedrooms	£1945
Three bedroom	£2345
Four bedroom	£2465

Table 3Decoration allowance – rates of payment

Where properties are undecorated tenants can claim an allowance at the following rates:

Size of property	Decoration allowance
One bedroom	£274
Two bedrooms	£355
Three bedroom	£517
Four bedroom	£598

Shift allowance - rates of payment

The shift allowance (payable where tenants 'downsize' or give up a bedroom as they move) is payable as follows:

First bedroom released	£2000
Subsequent rooms	£1000

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Committee:	Dated:
Housing Management and Almshouses Sub-Committee	16/05/2017
Subject: Pets Policy	Public
Report of: Director of Community and Children's Services	For Decision
Report author: Amy Carter, Community and Children's Services	

Summary

This report is presented to outline the review of the City of London Housing Service Pets policy.

The Pets policy has been reviewed, in line with current legislation, as a public-facing document to support the decisions made and enacted by the City's Estate Management teams in relation to the management of our properties.

The key changes to the document are:

- The addition of further detail relating to resident responsibility for keeping animals and ensuring no nuisance is caused;
- The addition of an 'exceptions' clause to enable staff to show appropriate discretion where necessary.

Recommendation

Members are asked to:

- Approve the Pets policy for use by the Housing & Neighbourhoods Division as part of our Estate Management practice.

Main Report

Background

1. This policy was developed in 2015 following a comprehensive consultation with residents. Prior to the 2015 review, larger animals such as cats and dogs were not allowed to be kept in our properties.
2. Following the consultation, residents remained clear that they did not wish for dogs to be kept, but there was a clear mandate for the allowance of indoor cats.
3. The changes in the 2015 review have been retained. Residents are allowed to keep up to two indoor cats, and dogs may only be kept in houses with self-contained gardens, with the exception of registered assistance dogs which may be kept in any property.

Current Position

4. The Pets policy has been reviewed, and some further clarity regarding resident responsibilities, particularly in cases of nuisance have been added to the policy.
5. A situation arose whereby a resident was allowed to keep a dog that was not registered as part of an accredited scheme. It was stated that the dog was for 'emotional support'. However, no accredited scheme exists for such animals. An exception was made in this case, owing to the recognition that removal of the animal would affect the resident's wellbeing. However, the previous policy did not allow for exceptions to be made. This meant that, whilst staff acted with the best intention, the decision was outside of our policy. The new policy includes a clause which allows a variation to the policy in exceptional circumstances.
6. Consultation has been carried out with residents of the Almshouses properties and a local policy is being developed in response to that consultation.

Corporate & Strategic Implications

7. The effective implementation of a Pets policy supports one priority in the Department of Community & Children's Service Business Plan:
 - Priority 4 – Homes and communities – Developing strong neighbourhoods and ensuring people have a decent place to live.
8. Estate staff will need to take action against any residents breaching the terms of the policy. It may take time to build up a case, for example, if cats are allowed to roam outdoors, estate staff will need to take photos and log incidents. However we are confident that estate staff are equipped to manage these types of incidents.
9. The use of the Pets policy is expected to offer clarity to residents and support officers in their decision making, which will reduce time spent discussing and explaining the stance relating to pets.

Conclusion

10. In conclusion, this policy has been reviewed as a matter of good practice, to reflect the current legal position and to support officers in their work. This policy will also assist with the understanding and expectations of our residents in regards to the management of their property.

Appendices

Appendix 1 – The Pets policy.

Appendix 2 – The Equality Analysis for the Pets policy.

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City of London Housing Service

Pets Policy

DRAFT

Approved by:	Housing Management and Almshouses Sub-Committee
Approval Date:	
Review Date:	<i>2 years from approval date</i>

1. Equal opportunities

The City of London Corporation operates an Equality & Diversity policy and this applies to all aspects of its services. We will ensure that no resident or service user is treated less favourably on the grounds of age, race, religion or belief, disability, sex, gender reassignment, sexual orientation, pregnancy or maternity, marriage or civil partnership status. This policy and all related information can be made available in different formats and translated upon request.

2. Aims

We are committed to providing excellent services that meet agreed service standards. The aim of this policy is: to set out the approach that we will take when managing the tenancies and leases of those residents who keep or wish to keep pets.

3. Legislative and regulatory framework

Animal Welfare Act 2006
Dangerous Dogs Act 1991
Control of Dogs Act 1992
Equality Act 2010
Landlord and Tenant Act 1985
The City of London Housing Service Tenancy Agreement

4. Related Policies and Strategies

N/A.

5. Scope of the Policy

This policy applies to the residents of our social housing estates in both tenanted and leasehold properties. This policy does not apply to our sheltered housing properties or the City of London Almshouses; please speak to your scheme manager for information about the local policy on pets.

6. Background

The City of London Corporation historically operated a 'no pets' policy across all its housing estates. This was revised, following a consultative exercise in 2014, to allow some pets to be kept.

7. Introduction

The City of London Corporation wishes residents to enjoy living in their homes and we understand that keeping a pet can help people to do so. As a landlord, we must balance this with ensuring the animals are kept safely and responsibly, and that a nuisance is not caused to other residents.

8. Cats

Up to two indoor cats or 'house cats' are permitted per property. Cats must not be allowed to roam in indoor or outdoor communal areas, or to cause a nuisance.

9. Dogs

Registered guide dogs, hearing dogs and other assistance dogs are permitted in any property; they must be registered with an accredited member organisation of Assistance Dogs International (ADI) or the International Guide Dog Federation (IGDF).

Those who live in a flat or a maisonette are not allowed to keep a dog other than a registered guide, hearing or assistance dog as above.

Those who live in a house, with exclusive use of an enclosed garden, are permitted to keep one dog per property.

All dogs, including registered assistance dogs, may not be exercised on City of London estates and communal areas, and must not be allowed to cause a nuisance to others.

All dogs, including registered assistance dogs, must be kept on a lead at all times when being taken through a City of London estate.

10. Other Animals

Small domestic pets such as hamsters, caged birds and fish are permitted to be kept. Exotic or wild animals are not permitted to be kept.

11. Resident Responsibilities

Residents are responsible for the health and welfare of their pets. Under the Animal Welfare Act 2006, this is called a duty of care and requires proper day-to-day management and care of an animal.

Residents are also responsible for the behaviour and control of any animal they own or those owned by visitors to their home. This includes issues such as fouling, noise, smell or injuries caused by the animal and damage caused to property, including communal areas.

Residents may not undertake the following activities from their City of London property:

- Breeding of animals.
- Sale of animals.
- Hoarding of animals – this is the term used for people who keep an excessive number of animals without the ability to properly house or care for them.

The City will take appropriate action if there is a breach of this policy and in cases where residents allow animals to cause nuisance.

12. Policy Exceptions

In exceptional circumstances, the City of London Corporation may consider variations to this policy. The variation will depend upon the individual situation, any extenuating circumstances and the evidence available. Each case will be considered on individual merit. The City's decision and reasons for the decision will be provided in writing to the relevant parties.

13. Further Information

If residents have any questions about the care of their pets, they should contact a vet or a suitable accredited animal welfare organisation.

Further information on keeping pets appropriately may be found:

<https://www.rspca.org.uk/adviceandwelfare/pets>

DRAFT

EQUALITY ANALYSIS (EA) TEMPLATE

Decision

Date

What is the Public Sector Equality Duty (PSED)? [Double click here for more information / Hide](#)

What is an Equality Analysis (EA)? [Double click here for more information / Hide](#)

How to demonstrate compliance [Double click here for more information / Hide](#)

Deciding what needs to be assessed [Double click here for more information / Hide](#)

Role of the assessor [Double click here for more information / Hide](#)

How to carry out an Equality Analysis (EA) [Double click here for more information / Hide](#)

Page 1 of 9

The Proposal *Click and hover over the questions to find more details on what is required*

Assessor name: Amy Carter

Contact details: Amy.Carter@cityoflondon.gov.uk / 0207 332 1653

1. What is the Proposal?

The proposal is to review our existing Pets Policy. The document was last reviewed in 2015 and is subject to a 2-year review cycle.

2. What are the recommendations?

There is no substantial change to the policy. It remains that in our social housing properties, residents are allowed to keep up to two indoor cats. Dogs are allowed to be kept in houses with self-contained gardens. Accredited assistance dogs are allowed to be kept in any property.

3. Who is affected by the Proposal? *Identify the main groups most likely to be directly or indirectly affected by the recommendations.*

Residents of our social housing estates are affected by the proposals; this includes social housing tenants, leaseholders and other tenants, for example, private tenants who rent from leaseholders.

Age [Double click here to add impact / Hide](#)

Check box if NOT applicable

Key borough statistics:

The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area. Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Age

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City’s social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal’s impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Age

The policy has no impact in relation to age for those living in our social housing properties.

For those living in our sheltered properties and almshouses, there is a different policy approach, whereby pets may not be kept. As such, this policy does have some negative impact on those over the age of 55.

N/A.

The reason for the different approach in sheltered and almshouse properties is owing to the higher level of vulnerability of this group. For those receiving care and support, it is not possible for care of an animal to be included in the care packages meaning the animal's care may be neglected which can also lead to an unsanitary property. A consultation is currently underway to see if those living in Almshouses wish to keep cats. Should the consultation results indicate that residents do wish to be able to keep cats, a trial period will commence.

Disability [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics:

Day-to-day activities can be limited by disability or long term illness - In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (76%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Extract from summary of the [2011 census relating to resident population health for the City of London can be found on our website](#).

The 2011 Census identified that for the City of London's population:

- 4.4% (328) had a disability that limited their day-to-day activities a lot
- 7.1% (520) had a disability that limited their day-to-day activities a little.

Source: 2011 Census: [Long-term health problem or disability, local authorities in England and Wales](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Disability

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal's impact on the equalities aims? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

The policy has a positive impact in relation to Disability, as all types of accredited assistance animals are allowed to be kept in any property.

It should be noted that there is a growing movement for 'emotional support' animals. As yet, there is no accredited scheme for such animals, and therefore they are not allowed to be kept.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

A case was raised whereby a resident kept a dog in a flat and outlined that it was for 'emotional support', the City decided not to remove the animal as it was recognised that it would be detrimental to the resident's wellbeing. However, the previous policy had no allowance for discretion, which meant the City was acting against policy. In the new policy, in accordance with good practice, a clause has been added to enable variations to the policy in exceptional circumstances.

Pregnancy and Maternity [Double click here to add impact / Hide](#)

Check box if NOT applicable

Key borough statistics:

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

- [Conception and Fertility Rates](#)
- [Live Births and Still Births](#)
- [Maternities](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Pregnancy and Maternity

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals.*

The data held on the City’s social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal’s impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The policy has no impact in relation to Pregnancy and Maternity.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

N/A.

Race [Double click here to add impact / Hide](#)

Check box if NOT applicable

Key Borough Statistics:

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally. White British residents comprise 57.5% of the total population, followed by White – Other at 19%.

The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest percentage in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%.

[See ONS Census information](#) or [Greater London Authority projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below

[Double click here to show borough wide statistics / hide statistics](#)

Race

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City’s social housing residents is currently being refreshed. New data will be available in 2017/18.

Race	
<p>What is the proposal's impact on the equalities aims? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact</p> <p>The policy has no impact in relation to Race.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>N/A.</p>

Religion or Belief [Double click here to add impact / Hide](#) Check box if NOT applicable

<p>Key borough statistics – sources include: The ONS website has a number of data collections on religion and belief, grouped under the theme of religion and identity. Religion in England and Wales provides a summary of the Census 2011 by ward level</p>	<p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.</p>
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[Double click here to show borough wide statistics / hide statistics](#)

Religion or Belief	
<p>Additional Equalities Data (Service level or Corporate) Include data analysis of the impact of the proposals</p> <p>The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.</p>	
<p>What is the proposal's impact on the equalities aims? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact</p> <p>The policy has a positive impact in relation to Religion or Belief.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>For some faiths, contact with a dog is not acceptable. In our policy, dogs may only be kept in houses with self-contained gardens and dogs may not be exercised in communal areas. This ensures that those who may not come into contact with dogs are protected in and around their homes.</p>

Sex [Double click here to add impact / Hide](#) Check box if NOT applicable

<p>Key borough statistics: At the time of the 2011 Census the usual resident population of the City of London could be broken up into:</p> <ul style="list-style-type: none"> • 4,091 males (55.5%) • 3,284 females (44.5%) 	<p>A number of demographics and projections for demographics can be found on the Greater London Authority website in the London DataStore. The site details statistics for the City of London and other London authorities at a ward level:</p> <ul style="list-style-type: none"> • Population projections <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.</p>
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[Double click here to show borough wide statistics / hide statistics](#)

Sex	
Additional Equalities Data (Service level or Corporate) <i>Include data analysis of the impact of the proposals</i> The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.	
What is the proposal's impact on the equalities aims? <i>Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact</i> The policy has no impact in relation to Sex.	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations? N/A.

Sexual Orientation and Gender Reassignment [Double click here to add impact / Hide](#) Check box if NOT applicable

Key borough statistics – suggested sources include: <ul style="list-style-type: none"> Sexual Identity in the UK – ONS 2014 Measuring Sexual Identity – ONS 	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.
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[Double click here to show borough wide statistics / hide statistics](#)

Sexual Orientation and Gender Reassignment	
Additional Equalities Data (Service level or Corporate) <i>Include data analysis of the impact of the proposals</i> The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.	
What is the proposal's impact on the equalities aims? <i>Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact</i> The policy has no impact in relation to Sexual Orientation or Gender Reassignment.	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations? N/A.

Marriage and Civil Partnership [Double click here to add impact / Hide](#) Check box if NOT applicable

Key borough statistics - sources include: <ul style="list-style-type: none"> The 2011 Census contain data broken up by local authority on marital and civil partnership status 	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.
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[Double click here to show borough wide statistics / hide statistics](#)

Marriage and Civil Partnership	
Additional Equalities Data (Service level or Corporate) <i>Include data analysis of the impact of the proposals</i> The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.	

Marriage and Civil Partnership

What is the proposal's impact on the equalities aims? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

The policy has no impact in relation to Marriage and Civil Partnership.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

N/A.

Additional Impacts on Advancing Equality & Fostering Good Relations [Double click here to add impact / Hide](#)

Check box if NOT applicable

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims.

In addition to the sources of information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service

- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

[Double click here to show borough wide statistics / hide statistics](#)

Additional Impacts on Advancing Equality & Fostering Good Relations

Additional Equalities Data (Service level or Corporate)

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

To continue to foster good relations, the City takes a firm stance against nuisance caused by animals and will ensure that owners take appropriate action when nuisance is cited.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

The previous policy had no potential for discretion. In the new policy, in accordance with good practice, a clause has been added to enable variations to the policy in exceptional circumstances which will aid the mitigation of any negative impact.

Conclusion and Reporting Guidance

Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.

If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.

If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.

Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.

Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.

This analysis has concluded that...

The policy approach is proportionate. Where a negative impact is noted on older people in sheltered accommodation and the almshouses, it is for a sound management reason, and as noted above, a consultation is currently underway to review this situation.

The reviewed policy now includes an exceptions clause enabling the City to use discretion where circumstances warrant it.

Outcome of analysis - check the one that applies

Outcome 1

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

Outcome 2

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should in line with the duty have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director:

Name:

Date:

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Committee:	Dated:
Housing Management and Almshouses Sub-Committee	16/05/2017
Subject: Complaints Policy	Public
Report of: Director of Community and Children's Services	For Decision
Report author: Amy Carter, Community and Children's Services	

Summary

This report is presented to outline the review of the City of London Housing Service Complaints policy.

The Complaints policy has been reviewed, in line with current legislation and regulation, as a public-facing document to support the decisions made and enacted by the Housing Service in relation to the management of our properties.

The key changes to the document are:

- The addition of further detail relating to what will not be treated as a complaint;
- A requirement for a reason to be given to escalate a complaint;
- The addition of an 'exceptions' clause to enable staff to show appropriate discretion where necessary;

Recommendation

Members are asked to:

- Approve the revised Complaints policy for immediate implementation.

Main Report

Background

1. This policy was last reviewed in 2015 following a period of regulatory change in social housing management.
2. There have been no large-scale changes in regulation or legislation since then. Therefore, the changes in the 2015 review have been retained.

Current Position

3. This review has been undertaken to ensure the policy is as clear as possible for residents and staff to use.
4. A lesson which has been learnt from current case management is that complainants often seek to escalate a complaint through further stages despite it having been answered in full at a previous stage. Complainants are now asked to give the reason that they wish to escalate the complaint, to avoid additional work when a complaint has already been dealt with in full .
5. The leaflet which accompanies this policy has also been reviewed to ensure it reflects the current position.

Corporate & Strategic Implications

6. The effective implementation of a Complaints policy supports two priorities in the Department of Community & Children's Service Business Plan:
 - Priority 4 – Homes and communities – Developing strong neighbourhoods and ensuring people have a decent place to live.
 - Priority 5 – Efficiency and Effectiveness – delivering value for money and outstanding services.
7. The use of the Complaints policy is expected to offer clarity to residents and support officers in their decision making, which will reduce time spent discussing and explaining our approach to complaint management.

Conclusion

8. In conclusion, this policy has been reviewed as a matter of good practice, to reflect the current legal position and to support officers in their work. This policy will also assist with the understanding and expectations of our residents in regards to the management of complaints they raise.

Appendices

Appendix 1 – The Complaints policy.

Appendix 2 – The Equality Analysis for the Complaints policy.

Amy Carter

Projects & Improvements Manager

T: 020 7332 1653

E: Amy.Carter@cityoflondon.gov.uk



Department of Community and Children's Services

Housing Service Complaints Policy

Approved by:	Housing Management and Almshouses Sub-Committee
Approval Date:	
Review Date:	<i>2 years from approval date</i>

1. Equal opportunities

The City of London Corporation operates an Equality & Diversity policy and this applies to all aspects of its services. We will ensure that no resident or service user is treated less favourably on the grounds of age, race, religion or belief, disability, sex, gender reassignment, sexual orientation, pregnancy or maternity, marriage or civil partnership status. This policy and all related information can be made available in different formats and translated upon request.

2. Aims

We are committed to providing excellent services that meet agreed service standards. The aims of this policy are to:

- confirm our commitment to addressing service requests and enquiries rapidly and at a local level;
- manage all complaints quickly, efficiently and with courtesy;
- ensure the complainant knows what is happening at all times;
- give a clear response within set time limits explaining the action we will take;
- treat complaints as feedback that will help us to continuously improve our services.

3. Legislative and regulatory framework

There is no legislative requirement on which a Complaints Policy must be based. This policy therefore reflects regulatory standards and guidance from the Housing Ombudsman and the Local Government Ombudsman.

4. Related Policies and Strategies

This policy fits within the City of London's Corporate Complaints Policy. It links to other Housing Service and departmental policies including:

- Anti-social Behaviour Policy
- Vexatious Complaints Policy.

5. Scope of the Policy

This policy applies to:

- City of London tenants, leaseholders and those freeholders who receive services from the Housing Service and those authorised to act on their behalf e.g. relatives and advice agencies.
- Those affected by the City of London Housing Service e.g. residents of neighbouring estates.
- Those applying for services delivered by the City of London Housing Service, such as people making a housing application.

6. Introduction

We recognise that there will be occasions when residents are not satisfied with the service we have provided, this policy sets out the approach we will take when such situations arise.

7. Data Protection and Confidentiality

The City of London will comply with the requirements of the Data Protection Act 1998. Complaints will be treated in confidence as far as possible. The name of the person complaining will not be divulged more than is absolutely necessary and will not be given to a third party without the agreement of the complainant. In some situations, it may not be possible to conceal the identity of the complainant. For example, if their complaint involves another person, it cannot be investigated without speaking to that person.

We will endeavour to investigate complaints made anonymously, however without specific details this may not always be possible. We will record such complaints, as they could provide early warnings of a service delivery failure.

8. Definition of a Complaint

A complaint is an expression of dissatisfaction about the standard of service provided or the action or lack of action taken by the City's staff in responding to a customer request or enquiry. Examples of a complaint can include where the complainant believes the Housing Service have:

- failed to do something that should have been done;
- failed to meet service standards;
- treated a customer unfairly.

We will take every reasonable step to resolve a complaint, whilst acting within our policies, procedures and statutory (legal) duties.

9. Situations which will not be investigated as complaints

The following situations will not be investigated as complaints:

- A request for a service, information or an explanation will not be treated as a complaint – staff will first be given the opportunity to respond to the request or enquiry and to follow required procedures.
- Complaints about other residents or neighbour disputes – these are managed via our Anti-social Behaviour Policy.
- Formal service charge disputes – which are dealt with under a separate legal process called a First Tier Tribunal (Property Chamber).
- Appeals against Benefit, Allocation or tenancy decisions – these are dealt with under appeals processes.
- Disagreement with a City policy or procedure. We encourage comments and feedback on our policies via consultation processes and will take comments received into account when policies are reviewed.
- Any issue that has previously been addressed through the Housing Service's formal Complaints Policy.
- We do not accept complaints where the customer has started legal proceedings or has previously taken the matter to court or tribunal.

10. Group Complaints

On occasion, we may receive the same complaint from a number of people. A group complaint does not change the process, and the complaints will be responded to in the

same way. However, where appropriate, we will communicate with the 'lead' complainant if one is identified.

11. Support for those who wish to complain

A leaflet explaining the Complaints Policy and Procedure is available.

If the complainant wishes to make a formal complaint in person or by phone, staff will record the complaint, the solution being sought by the complainant, and the action taken to date. This will be signed by the complainant and submitted on their behalf via the process below.

12. Timescales

We will acknowledge all complaints within two working days and send a full written response within a further 10 working days. If an investigation requires longer than this we will contact the complainant and inform them of when they can expect a full response. At each stage of the formal process, a request for escalation must be received within 30 calendar days of the response being sent to the complainant.

The complaint stages are sequential and complaints will be dealt with fully under each stage. There is no option to 'skip' stages.

We will only investigate complaints which are made within six months of the event which caused the complaint.

13. Complaint Stages

The Informal Stage

We ask customers to initially contact our staff; they may ask for the Estate Manager, Sheltered Housing Manager or appropriate Team Manager. Staff will make every effort to resolve the issue directly within 10 working days. If it is not possible for them to resolve the issue, they will provide details of how to make a formal complaint.

No member of staff will investigate a complaint that is about them. If the complaint relates directly to a manager, then it should be sent straight to the Housing Complaints team, who will ensure another manager investigates the complaint.

Formal process – Stage 1

This stage formalises the complaint. The complaint should be submitted to the Housing Complaints Team by email to housing.complaints@cityoflondon.gov.uk or by post to the Barbican Estate Office, 3 Lauderdale Place, London EC2Y 8EN. As above, this may be done by another person, including a staff member, on the complainant's behalf if necessary.

The Housing Complaints team will acknowledge the complaint within two working days and ensure it is passed to the appropriate senior manager for investigation; this will usually be the senior manager responsible for the provision of the service in question. If the issue relates directly to a manager, then the Housing Complaints Team will direct it to the next appropriate manager.

The designated manager will carry out an investigation. This may involve a meeting with relevant staff to review the complaint; gathering information and deciding if anything can be done to resolve the complaint at this stage. The investigation may also involve a meeting or discussion with the complainant.

The Head of Estates will review all Stage 1 complaint responses before they are issued.

We aim to provide a full written response to the complaint within 10 working days. If an investigation requires longer than this, we will contact the complainant and give a date by which they can expect a full response. The full response will advise of the outcome of the investigation, any actions to be taken as a result, and the action that may be taken by the complainant if they wish for their complaint to be escalated to Stage 2.

Formal process – Stage 2

If a complainant thinks an aspect of the complaint was not responded to at Stage 1 or that the complaint has not been responded to appropriately, they may request that the complaint is escalated to Stage 2, providing the reason why. The request should be sent to the Housing Complaints Team by email or by post as above. The team will acknowledge the complaint within two working days and ensure it is passed to the appropriate Assistant Director.

The appropriate Assistant Director will review the actions taken at Stage 1 and investigate further if required. A full response will be sent from the Assistant Director within 10 working days of the receipt of the Stage 2 complaint. If an investigation requires longer than this, we will contact the complainant and give a date by which they can expect a full response. This response will advise of the view of the Assistant Director, any actions to be taken as a result, and the action that may be taken by the complainant if they wish for their complaint to be taken to Stage 3.

Formal process – Stage 3

If a complainant thinks an aspect of the complaint was not responded to at Stage 2 or that the complaint has not been responded to appropriately, they may request that the complaint is escalated to Stage 3, providing the reason why. Stage 3 complaints should be addressed to the Town Clerk by email to complaints@cityoflondon.gov.uk or by post to Town Clerk's Office, 2nd Floor, West Wing, City of London, Guildhall, PO Box 270, London, EC2P 2EJ).

The Town Clerk will not consider a complaint about the Housing Service unless it has already been through Stages 1 and 2 of the Complaints Process. If a complainant contacts the Town Clerk or another senior manager at an earlier stage, they will be referred back to the Housing Service.

An officer from the Town Clerk's department will be allocated to carry out a review of the actions taken at Stages 1 and 2. A response will be sent from the Town Clerk within 10 working days of the receipt of the Stage 3 complaint. This response will advise of the view taken by the Town Clerk and any actions to be taken as a result. It will inform the complainant that the City's internal processes are now at an end and will advise on how they may find out about further action they may take.

14. Further options

If a complainant thinks an aspect of the complaint was not responded to during the three stages of our process or that the complaint has not been responded to satisfactorily, they have a number of potential options which are summarised below.

The complainant may approach an Ombudsman. The following section summarises which types of queries should go to which Ombudsman.

Local Government Ombudsman

- Right to buy and other sales
- Housing Allocations under Housing Act 1996 Part 6
- General housing advice and Homelessness
- Anti-social behaviour
- Planning and building control

The Local Government Ombudsman can require a local authority to publish and consider the report of an investigation, but has no powers to require any other action or impose compensation.

Housing Ombudsman

- Leasehold services
- Transfers outside the Housing Act 1996 Part 6
- Rents and service charges
- Occupancy rights
- Repairs and improvements
- Tenant behaviour
- Cleaning and grounds maintenance

The Housing Ombudsman process incorporates an additional step whereby the complaint can be taken to a 'designated person' to attempt a resolution before involving the Ombudsman. This designated person may be a local authority councillor, member representing the ward in which the complainant lives or the local Member of Parliament (MP). The designated person is not obliged to take on the complaint but may do so if they wish. The City will provide guidance to Members in residential wards on the role of a designated person.

The Housing Ombudsman can require action or compensation but does not require reports to be published.

15. Mediation

Southwark Mediation Centre provides an independent complaints resolution service to residents on all City of London estates. At any stage in the process, the complainant can request help from this service. We may also refer complainants to the service if we think that this may help to resolve the complaint more effectively.

The involvement of Southwark Mediation Centre will effectively 'pause' the complaints process at any stage so that resolution can be sought, but if this is not successful, the complaint may resume the complaint from the stage it had previously reached.

16. Unacceptable Behaviour

Occasionally complainants behave in a way which is unreasonable. This may include:

- making numerous complaints about minor matters or matters which staff cannot change and which are taking up an unreasonable amount of staff time;
- contacting multiple officers to complain about the same issue;
- being abusive or offensive to staff;
- making unfounded or unsupported allegations about staff which may be malicious in nature.

This behaviour can be identified at any stage of the complaints process, including the informal stage, and will be dealt with in the same way. The Department of Community & Children's Services has a Vexatious Complaints Policy which we will use in such circumstances.

The complainant will be advised of the policy and that it may be applied to them. The Director of Community and Children's Services will make the decision whether the policy may be used. Once the decision has been made, the complainant will be advised in writing that we will no longer communicate directly with them, except in an emergency. They will still be able to report repairs in the normal way and can communicate with us if necessary through an independent third party such as a mediator or advice agency.

17. Policy Exceptions

In exceptional circumstances, the City of London Corporation may consider variations to this policy. The variation will depend upon the individual situation, any extenuating circumstances and the evidence available. The decision and reasons for the decision will be provided in writing to the relevant parties.

The City of London Almshouses have a slightly different process between stages 2 and 3, should an almshouse resident wish to escalate from Stage 2 to 3, they will be advised of the options available to them.

18. Performance Monitoring

The number of complaints received by Housing & Neighbourhoods and Barbican & Property Services are recorded via quarterly KPIs.

The Community & Children's Services Committee receives quarterly performance reports which include the number and type of complaints received and response times.

The Housing Management & Almshouses Sub-Committee receives a six-monthly update which reports on the number of formal complaints at each stage. A short, confidential briefing summarising any complaints that reach Stage 3 will be presented to the Chairman and Deputy Chairman of the Housing Management & Almshouses Sub-Committee.

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EQUALITY ANALYSIS (EA) TEMPLATE

Decision

Date

What is the Public Sector Equality Duty (PSED)? [Double click here for more information / Hide](#)

What is an Equality Analysis (EA)? [Double click here for more information / Hide](#)

How to demonstrate compliance [Double click here for more information / Hide](#)

Deciding what needs to be assessed [Double click here for more information / Hide](#)

Role of the assessor [Double click here for more information / Hide](#)

How to carry out an Equality Analysis (EA) [Double click here for more information / Hide](#)

Page 1

The Proposal *Click and hover over the questions to find more details on what is required*

Assessor name: Amy Carter

Contact details: Amy.Carter@cityoflondon.gov.uk / 0207 332 1653

1. What is the Proposal?

The proposal is to review our existing Complaints Policy. The document was last reviewed in 2015 and is subject to a 2-year review cycle.

2. What are the recommendations?

There is no substantial change to the policy. It remains a 3-stage process, in accordance with regulatory guidance. Some minor changes have been made, for examples an exceptions clause has now been added which allows us to respond to individual circumstances where necessary.

3. Who is affected by the Proposal? *Identify the main groups most likely to be directly or indirectly affected by the recommendations.*

Our residents and service users, and those acting on their behalf are predominantly affected by the proposals. On occasion, members of the public may approach us with concerns and it may be appropriate to use this policy to manage those concerns.

Age [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics:

The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area. Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Age

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City’s social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal’s impact on the equalities aims? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

The policy has a positive impact in relation to Age. To ensure we are being inclusive,

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Positive impact, no further change required.

Age

we do not require complaints to be made in writing, we accept complaints via any medium, including verbal, telephone, email and letter. If a complainant wishes to raise a complaint in person or by telephone, we will take a record of the complaint, and ensure they are happy it is an accurate record.

Disability [Double click here to add impact / Hide](#)

Check box if NOT applicable

Key borough statistics:

Day-to-day activities can be limited by disability or long term illness - In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Extract from summary of the [2011 Census relating to resident population health for the City of London can be found on our website](#).

The 2011 Census identified that for the City of London's population:

- 4.4% (328) had a disability that limited their day-to-day activities a lot
- 7.1% (520) had a disability that limited their day-to-day activities a little.

Source: 2011 Census: [Long-term health problem or disability, local authorities in England and Wales](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Disability

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The policy has a positive impact in relation to Disability, as we do not insist that complaints are made by individuals themselves, a resident or service user may ask someone to act on their behalf. Furthermore, we do not require complaints to be made in writing, we accept complaints via any medium, including verbal, telephone, email and letter. If a complainant wishes to raise a complaint in person or by telephone, we will take a record of the complaint, and ensure they are happy it is an accurate record.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Positive impact, no further change required.

Pregnancy and Maternity [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics:

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

- [Conception and Fertility Rates](#)
- [Live Births and Still Births](#)
- [Maternities](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Pregnancy and Maternity

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals.*

The data held on the City’s social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal’s impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The policy has no impact in relation to Pregnancy and Maternity.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

N/A.

Race [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key Borough Statistics:

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally.

White British residents comprise 57.5% of the total population, followed by White – Other at 19%.

The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest percentage in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%.

[See ONS Census information](#) or [Greater London Authority projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below

[Double click here to show borough wide statistics / hide statistics](#)

Race

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City’s social housing residents is currently being refreshed. New data will be available in 2017/18.

Race	
<p>What is the proposal's impact on the equalities aims? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact</p> <p>The policy has no impact in relation to Race.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>N/A.</p>

Religion or Belief [Double click here to add impact / Hide](#) Check box if NOT applicable

<p>Key borough statistics – sources include: The ONS website has a number of data collections on religion and belief, grouped under the theme of religion and identity. Religion in England and Wales provides a summary of the Census 2011 by ward level</p>	<p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.</p>
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[Double click here to show borough wide statistics / hide statistics](#)

Religion or Belief	
<p>Additional Equalities Data (Service level or Corporate) Include data analysis of the impact of the proposals</p> <p>The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.</p>	
<p>What is the proposal's impact on the equalities aims? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact</p> <p>The policy has no impact in relation to Religion or Belief.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>N/A.</p>

Sex [Double click here to add impact / Hide](#) Check box if NOT applicable

<p>Key borough statistics: At the time of the 2011 Census the usual resident population of the City of London could be broken up into:</p> <ul style="list-style-type: none"> • 4,091 males (55.5%) • 3,284 females (44.5%) 	<p>A number of demographics and projections for demographics can be found on the Greater London Authority website in the London DataStore. The site details statistics for the City of London and other London authorities at a ward level:</p> <ul style="list-style-type: none"> • Population projections <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.</p>
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[Double click here to show borough wide statistics / hide statistics](#)

Sex

Sex

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The policy has no impact in relation to Sex.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

N/A.

Sexual Orientation and Gender Reassignment [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics – suggested sources include:

- [Sexual Identity in the UK – ONS 2014](#)
- [Measuring Sexual Identity – ONS](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Sexual Orientation and Gender Reassignment

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The policy has no impact in relation to Sexual Orientation or Gender Reassignment.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

N/A.

Marriage and Civil Partnership [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics - sources include:

- [The 2011 Census contain data broken up by local authority on marital and civil partnership status](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Marriage and Civil Partnership

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

Marriage and Civil Partnership

What is the proposal's impact on the equalities aims? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

The policy has no impact in relation to Marriage and Civil Partnership.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

N/A.

Additional Impacts on Advancing Equality & Fostering Good Relations [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims.

In addition to the sources of information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service

- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

[Double click here to show borough wide statistics / hide statistics](#)

Additional Impacts on Advancing Equality & Fostering Good Relations

Additional Equalities Data (Service level or Corporate)

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

To continue to foster good relations, the City records all complaints and manages and monitors them through the same process. Whilst the policy has only positive impacts, we ensure we monitor the content and nature of complaints and remain alert for potential discrimination. For example, should multiple complaints be raised about a particular issue or by a particular group of residents we would ensure further investigation was carried out.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

The previous policy had no potential for discretion. In the new policy, in accordance with good practice, a clause has been added to enable variations to the policy in exceptional circumstances. This allows us to respond to individual circumstances when they arise.

Conclusion and Reporting Guidance

Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.

If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.

If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.

Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.

Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.

This analysis has concluded that...

The policy approach is proportionate. There are only two variations which impact upon a protected characteristic and they are positive impacts. The reviewed policy also includes a clause enabling the City to use discretion where circumstances warrant it to adapt to meet individual circumstances.

Outcome of analysis - *check the one that applies*

Outcome 1

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

Outcome 2

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should in line with the duty have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director:

Name:

Date:

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Committee(s)	Dated:
Housing Management and Almshouses Sub-Committee	16 May 2017
Subject: Housing Allocations Scheme 2017	Public
Report of: Director of Community and Children’s Services	For Decision
Report author: Adam Johnstone, Strategy Officer	

Summary

This report presents the proposed City of London Corporation Housing Allocations Scheme 2017. The City Corporation is required by the Housing Act 1996 to publish an Allocations Scheme and abide by the scheme when making offers of social housing tenancies to applicants.

The proposed scheme offers a greater degree of clarity than the current scheme, which can be ambiguous in its operation. It also makes a number of changes to take account of fluctuations in housing demand and supply since the policy was last reviewed and addresses some minor legal issues.

The proposed scheme will need to undergo a full public consultation before it can be legally adopted. The proposed scheme is presented today for Members comments and approval is sought to go out to public consultation. Following the consultation, a final version of the scheme will then be brought back to this committee later in the year for final approval.

Recommendations

Members are asked to:

- Comment on the proposed Housing Allocations Scheme 2017
- Approve the draft Housing Allocations Scheme 2017 for public consultation

Main Report

Background

1. The City Corporation is required by Part VI of the Housing Act 1996 to publish a Housing Allocations Scheme. This document will determine the basis for allocating vacancies within the City Corporation’s social housing stock and housing association vacancies to which it has nomination rights.
2. The policy set out in the Allocations Scheme is governed by the Housing Act 1996, the Homelessness Act 2002, Housing Act 2004, Localism Act 2011 and two pieces of Statutory Guidance; *Allocation of accommodation: guidance for*

local housing authorities in England (2012) and Providing social housing for local people (2013).

3. The Housing Act 1996 requires that reasonable preference is shown to several groups of applicants. These are applicants living in overcrowded, insanitary or unsuitable accommodation, applicants found to be homeless under Part VII of the Act, applicants with a medical or welfare related need to move and applicants who need to live in a specific area to avoid hardship. Local authorities have discretion to set other local priorities operating below the level of reasonable preference and can determine how applicants with similar needs are prioritised.
4. Local authorities prioritise applicants by reviewing their circumstances and either placing them into one of several bands or awarding them a number of points. The City Corporation adopted its current bands based Allocations Scheme in December 2012 in response to the Government's then preference for this system. This was significantly revised in September 2015 to become a hybrid 'points within bands' system.

Current Position

5. The current hybrid 'points within bands' Allocations Scheme is unnecessarily complex and can be ambiguous in practice and unclear to applicants. A decision to operate either a points or a bands system is needed to provide a sufficient level of clarity.
6. The revised policy has been operating for around eighteen months. During this time a number of issues have arisen which need to be addressed to enable the policy to operate more efficiently and make optimal use of the Corporation's limited social housing stock.
7. As a revision, the September 2015 changes were adopted after a two week public consultation. It is possible that this could be open to challenge, were an applicant able to successfully argue that the revision was effectively a new scheme and thereby required a full public consultation.

Proposal

8. It is therefore proposed that a new scheme, the Housing Allocations Scheme 2017, is adopted. This is presented in Appendix A.
9. This uses the current scheme as a starting point but makes considerable changes to address the issues outlined above. The most significant changes are detailed in the following sections. A comprehensive list of changes is available in Appendix B.

A Points System

10. The proposed Allocations Scheme would operate a points system. This has historically been the City Corporation's preference as it aims to understand each household's circumstances and offer accommodation to those who need it most.

Lowering the Savings Threshold

11. The City Corporation currently operates both a savings and an income test when assessing whether new applicants qualify to go on the waiting list. To qualify, a household must have a combined gross income of less than £60,000 and combined household savings of less than £30,000.
12. We believe this is sufficient for someone to rent a home in the private sector and the proposed scheme lowers the savings threshold to £16,000 in order to target limited social housing at those most in need. The income threshold would remain at £60,000.

Defining Lower Income

13. The City Corporation offers some preference to new applicants who work within the Square Mile and are on a lower income. We currently define a lower income as a gross household income of £26,000 per year.
14. We propose linking our definition of lower income to the earnings two people working full time at the National Living Wage would receive. In 2017-18 this would be £29,640 per year. Annual increases in the National Living Wage will automatically increase this.

Expanding the Lower Income City Connection Group

15. The current scheme only offers this 'lower income' preference to people who work in the Square Mile. The new scheme proposes offering the same level of priority to people who live in the City of London and have a household income below the threshold.
16. This would open up this part of the waiting list to City residents who work outside of the Square Mile, City residents who have recently lost their job and City residents who are not in paid employment but who experience difficulties paying private rents as a result of welfare reform.

Increasing the priority of the Studio Upgrade group

17. The September 2015 revisions introduced a Studio Upgrade category to enable City Corporation tenants, aged over 45, living in a studio and with no housing needs, to apply for a transfer to a one bedroom flat. This was done to meet some tenants' aspirations for a larger home and free up studios for new lettings.
18. According to the City of London Strategic Housing Market Assessment, 48 per cent of applicants on our waiting list require studio accommodation while only 31 per cent of lettings are studios. In contrast only 13 per cent of applicants require a one bedroom flat, while 30 per cent of new lettings are one bedroom flats. This mismatch between demand and supply means that if both waiting lists were closed to new applicants today, it would take 2.6 years to address the need for one bedroom flats but 9.4 years to meet the need for studios.

19. The Studio Upgrade group is in band 3 of 4 in the current scheme. This level of priority has not enabled many transfers to take place and the category is not yet meeting its aim of creating vacant studios available for re-letting. To address this, the proposed scheme increases the priority of the group to position 5 of 12.
20. The proposed scheme would also increase the number of current tenants who can apply for a Studio Upgrade transfer. As well as those who are over 45, this category would also be open to couples living together in a studio and parents whose children do not live with them, but who visit often and would regularly spend the night if there was space. Tenants in a studio flat who have a recognised need to move to a larger flat, for example due to a disability or medical condition, will continue to be awarded reasonable preference and prioritised accordingly.

Introducing extra priority for Mixed Sibling Sharing

21. The current Allocations Scheme treats overcrowding cases the same, regardless of who is sharing a bedroom. The proposed scheme would offer additional priority to overcrowded households where two siblings of different genders, at least one of whom is aged ten or over, are being forced to share a bedroom. This is because the psychological effects of overcrowding are worse when siblings of different genders must share a bedroom during puberty.

Reducing the priority of applicants who act in bad faith

22. The current scheme reduces the priority given to homeless applicants who have been found 'Intentionally Homeless'. This term is defined in Part VII of the Housing Act 1996 as someone who deliberately did something, or failed to do something, that caused them to lose their home. This could be something like anti-social behaviour or not paying their rent when they had the money to do so.
23. The proposed scheme would expand this to reduce the priority of other applicants whose actions have contributed to their housing difficulties. This could include applicants who move into accommodation that is too small for their needs, in order to gain overcrowding priority, when they could have afforded a larger home. We want to discourage this kind of behaviour to be fair to those applicants who genuinely need help to find suitable accommodation.

Including decants in the Allocations Scheme

24. A decant is a move initiated by the City Corporation rather than the tenant and is usually used where vacant possession of a flat is required for major works or a regeneration project. A decant transfer does not engage Part VI of the Housing Act 1996 and as such does not need to be handled through the Allocations Scheme. The current scheme does not include reference to decants, although many have taken place, most notably from Mais House.
25. The proposed scheme includes decants as this is the most transparent way of letting all applicants know who is being housed and why. The proposed scheme also divides decants into early, middle and urgent moves, with increasing levels

of priority. This will prevent decants from dominating the allocations process and crowding out other applicants in housing need.

Increasing the priority of homeless applicants after twelve months

26. The September 2015 revisions reduced the priority of homeless applicants from band 2 of 4 to band 3 of 4. This was done to align with the City Corporation's Homelessness Strategy and encourage those threatened with homelessness to engage with prevention work, rather than relying on an offer of social housing.
27. This loss of priority has had other consequences and applicants to whom the City Corporation has accepted the full homelessness duty are now staying in temporary accommodation for longer periods. Long stays in temporary accommodation are detrimental to applicants and expensive for the City Corporation.
28. The proposed scheme would therefore offer increased priority to homeless applicants once they have been in temporary accommodation provided by the City Corporation for twelve months. This additional priority will be sufficient to increase their position from group 9 of 12 to a position between groups 2 and 3 of 12. This will limit waiting times and temporary accommodation expenditure.

Consultation

29. If approved, the proposed Housing Allocations Scheme 2017 will be subject to a full public consultation, between 22 May and 18 August 2017.
30. A final version of the scheme will be brought back to this committee and then the Community and Children's Services Grand Committee for final approval later in the year.

Corporate & Strategic Implications

31. The proposed Allocations Scheme supports two priorities in the Department of Community & Children's Service Business Plan These are:
 - Priority 4: Homes and communities – Developing strong neighbourhoods and ensuring people have a decent place to live.
 - Priority 5: Efficiency and Effectiveness – delivering value for money and outstanding services.

Financial Implications

32. Chamberlain's have been consulted and had no additional comments.

Legal Implications

33. An independent review of the Housing Allocations Scheme 2017 was provided by TLT LLP. The proposed scheme has been amended in accordance with their advice.

34. Comptroller & City Solicitors have been consulted and had no additional comments.

Equalities Implications

35. A full Equalities Impact Assessment has been carried out for this policy. This concluded that the proposed scheme would have a number of positive impacts on applicants who share protected characteristics. A number of minor adverse impacts have also been identified, however, these are all necessary to achieve wider policy objectives and appropriate mitigations have been put in place.

Conclusion

36. This report presents the City of London Housing Allocations Scheme 2017. The proposed scheme provides a clear and fair framework for allocating social housing. The scheme is more legally robust than the one it is intended to replace and addresses a number of current issues to ensure optimal use is made of the Corporation's limited housing stock.

Appendices

- Appendix A – Housing Allocations Scheme 2017
- Appendix B – Comprehensive list of changes
- Appendix C – Equalities Impact Assessment

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Housing Allocations Scheme 2017

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1: Introduction

About the Allocations Scheme

- 1.1 This document sets out the City of London Corporation's (the City Corporation) Housing Allocations Scheme. This determines the basis for allocating vacancies within the City Corporation's social housing stock and housing association vacancies to which it has nomination rights.
- 1.2 This document provides comprehensive information about the process the City Corporation applies to the allocation of social housing. This will ensure applicants are informed about and can understand how decisions are made.
- 1.3 The City Corporation uses a points based Allocations Scheme. Applicants' circumstances will be assessed and points will be awarded to reflect the urgency of a household's housing need. Using points means we are able to operate a fairer system, taking the full range of each applicant's circumstances into account and ensuring housing goes to those most in need.
- 1.4 The Allocations Scheme cannot cover every eventuality. The City Corporation recognises that some exceptional circumstances may arise which are not addressed by this scheme. In such cases the Assistant Director for Housing and Neighbourhoods has discretionary powers for example; to award additional priority, to approve offers of housing and to exempt applicants from one or more rules set out in this scheme, taking into consideration all factors relevant to housing and social needs.
- 1.5 In developing the Allocations Scheme, consideration has been paid to the City Corporation's Housing Strategy, Homelessness Strategy, Tenancy Strategy, Fraud Policy, Strategic Housing Market Assessment and the Department of Community and Children's Service's Business Plan. As such, the aims of this Scheme are to:
 - achieve a balance between the housing needs of existing City of London tenants and those applying to be new tenants
 - make the best use of our housing stock in this time of extremely high demand for social housing
 - be clear about who can go on our housing register, how we will prioritise households on the register, and the process for allocating homes
 - efficiently let our properties to reduce the amount of time properties are empty

- help achieve our Business Plan aim to develop strong neighbourhoods and ensure people have a decent place to live.

Statement on Choice

- 1.6 The Housing Act 1996 requires local authorities to include in their Allocations Scheme a statement of the authority's policy on offering applicants a choice of accommodation or the opportunity to express preferences about their accommodation.
- 1.7 The City Corporation will offer a choice of accommodation in line with its Choice Based Lettings scheme, which provides the opportunity to choose accommodation by expressing an interest in properties that are advertised (see section 10 for details of this process).

Legal Context

- 1.8 The policies set out in this document are shaped by a framework of legislation including the Housing Act 1996 (as amended by the Homelessness Act 2002 and the Localism Act 2011). It also reflects regulations and guidance issued by government relating to allocations. The City Corporation is required by s.166A(1) of the Housing Act to have an allocations scheme for determining priorities, and for defining the procedures to be followed in allocating housing accommodation; and must allocate in accordance with that scheme (s.166A(14)).

Equalities

- 1.9 The City Corporation promotes equal opportunities and opposes all forms of unfair discrimination. Providing a clear and consistent policy for housing allocation supports the City Corporation's duty to treat all applicants fairly. All applications and decisions relating to them will be made in line with this policy, irrespective of the applicant's gender, marital or civil partnership status, race, nationality or ethnic origin, disability, sexual orientation, age, gender reassignment or pregnancy and maternity status.

Policy changes

- 1.10 New government guidance and newly arising circumstances can require amendment to policies during their proposed lifetime. To make sure this allocations policy remains current and operates fairly and within the law, the Director of Community and Children's Services in consultation with the Chairman of Housing Management and Almshouses Sub Committee will be able to approve minor amendments. Major revision will subject to approval by the Sub Committee and where appropriate to a public consultation.

2: The Housing Register

- 2.1 To support the Allocations Scheme the City Corporation holds a Housing Register of applicants who can be considered for an allocation of social housing.
- 2.2 Applicants must normally be over 18 years of age in order to receive an offer of accommodation from the City Corporation. In exceptional circumstances, applicants under the age of 18 will be considered after a referral from Children's Social Care.
- 2.3 There are three stages an applicant must pass before being considered for an allocation of general needs social housing; **eligibility**, **qualifying** and **preference**. These are applied in different ways to new applicants and City Corporation tenants applying for a transfer. The precise meanings of these terms are defined in sections 3 - 6.
- 2.4 A slightly different system operates for older people's housing. For more information on this, please see section 13.

New Applicants

- 2.5 To join the Housing Register, applicants who are not current tenants of the City Corporation must demonstrate that they are:
 - a) **eligible** for an allocation of accommodation
(see section 3)
 - and b) **qualifying** for an allocation of accommodation
(see section 4)
- 2.6 If accepted onto the Housing Register, an application for a new tenancy will also be assessed to determine whether the applicant is:
 - i) entitled to **reasonable preference**
(see section 5)
 - or ii) a **City letting preference**
(see section 6)
 - or iii) able to join the **low priority** group only
(see section 6)

Tenant Transfers

- 2.7 To join the Housing Register, applicants who are current City Corporation tenants applying for a transfer must demonstrate that they are:
- a) **qualifying** for an allocation of accommodation (see section 4)
 - and b) either
 - i) entitled to **reasonable preference** (see section 5)
 - or ii) a **City transfer preference** (see section 6)
- 2.8 The City Corporation does not offer like for like transfers and current tenants who cannot demonstrate either **reasonable preference** or a **City transfer preference** will not be able to go on the Housing Register.
- 2.9 Existing City Corporation tenants who wish to move can register for a mutual exchange, access the pan-London mobility scheme Housing Moves or apply to another local authority under the Right to Move.

3: Eligibility

- 3.1 Eligibility for social housing is set out by the Secretary of State in regulations. Eligibility depends on the applicant's nationality, immigration status and whether they have recently lived abroad.
- 3.2 The following groups are **not** eligible to join the Housing Register:
- people subject to immigration control
 - people who only have the right to reside in the UK because they (or a member of their household) are a jobseeker
 - people who are not habitually resident in the UK
 - people who have a right to reside in the UK of less than three months.
- 3.3 Full details of the classes of persons from abroad who are eligible or ineligible for an allocation are available in the Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006 (SI 2006 No.1294) and subsequent amendments.
- 3.4 Where an applicant who is eligible for an allocation of accommodation but who has a partner who falls into one of the above groups, they cannot have a joint tenancy with their partner.

4: Qualifying

- 4.1 Qualification for social housing is determined by local housing authorities, subject to some statutory requirements.
- 4.2 Different qualifying criteria apply to those applying for a new tenancy and current tenants applying for a transfer. These are displayed in the table below:

Qualification criteria	New tenancy	Tenant transfer
Applicants must demonstrate a local connection (see 4.3) or exemption from this rule (see 4.4)	✓	
Neither the applicant, nor any member of their household, owns in full or in part, a property in the UK or abroad	✓	✓
Neither the applicant, nor any member of their household, holds, a secure, assured, flexible or introductory tenancy with another social landlord, which they do not intend to surrender upon transfer	✓	✓
Neither the applicant, nor any member of their household, must have previously exercised their right to buy or have received a cash incentive for a mortgage and subsequently sold their property (this criteria will be disregarded if the City Corporation subsequently accepts a homelessness duty under Part VII of the Housing Act 1996)	✓	✓
Households must have an annual combined income (excluding benefits and before tax) of less than £60,000	✓	
Households must have household savings or capital of less than £16,000 (any lump sum received by a member of the Armed Forces as compensation for an injury or disability sustained on active service will be disregarded)	✓	
Neither the applicant, nor any member of their household, should have demonstrated unacceptable behaviour (see 4.5)	✓	✓

- 4.3 In order to qualify for an offer of accommodation from the City Corporation, applicants must first demonstrate a local connection. This can be done in a number of ways:

- those who are resident in the City of London for a minimum period of 24 months (including temporary or supported accommodation provided by the City Corporation in other areas)
- those employed by the City Corporation, in any location and including the City of London Academies Trust, for a minimum of 24 months (including interim or supported employment and employees on parental leave)
- those employed within the City of London for a minimum 24 months and who have been working for at least 16 hours per week (including interim or supported employment and employees on parental leave)
- those who currently live in the household of a City Corporation tenant who is, or whose partner is, their parent or legal guardian. To qualify in this way the child must also:
 - have spent at least two years of their childhood (defined as under 18 years old) in that tenant's household
 - and have spent their entire adult life to date (defined as 18 years old and over) in that tenant's household apart from periods spent outside the household:
 - o to attend university
 - o to join the Armed Forces
 - o to undergo medical treatment
 - o to serve a custodial sentence
- those who are a young person looked after by the City Corporation and placed in care, irrespective of the location of their placement
- those who provide care and support to a City resident or City Corporation tenant. This relationship must be recognised by an award of Carer's Allowance or by an Adult Social Care Carer's Assessment.

4.4 When allocating its housing, the Corporation is committed to ensuring that certain categories of people have access to appropriate accommodation. This allocations scheme therefore ensures that the requirement for a local connection set out in 4.3 does not apply to the following groups:

- those who are currently serving in the regular armed forces or who were serving in the regular forces at any time in the five years preceding their application for an application of social housing
- bereaved spouses or civil partners of those serving in the regular forces where (i) the bereaved spouse or civil partner has recently ceased or will cease to be entitled, to reside in Ministry of Defence accommodation following the death of their service spouse or civil partner and (ii) the death was wholly or partly attributable to their service

- existing or former members of the reserve forces who are suffering from a serious injury, illness, or disability which is wholly or partly attributable to their service
- households to whom the City Corporation has accepted a full homelessness duty under Part VII of the Housing Act 1996
- households who are exercising their Right to Move under the Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015 (SI 2015/967)
- households the City Corporation has agreed to house as part of a reciprocal agreement with another housing authority
- households who are referred to the City Corporation through Housing Moves and other reciprocal mobility schemes.
- households with an urgent need to move away from their current local area. For example an applicant who is fleeing domestic violence.

4.5 Applicants will be excluded from the City Corporation's Housing Register if their behaviour, or the behaviour of a member of their household or a guest of the household, has not been acceptable and there are reasonable grounds to believe that the applicant will not be a suitable future tenant. Unacceptable behaviour includes:

- owing serious rent arrears to any current or past landlord
- failing to comply with a current or past tenancy or licence agreement with a local authority, housing association or private landlord
- conviction for illegal or immoral purposes
- causing nuisance and annoyance to neighbours or visitors which results in court proceedings
- committing certain criminal offences and still posing a threat to neighbours or the community
- any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse towards a partner or members of the family. This can encompass but is not limited to psychological, physical, sexual, financial and emotional abuse
- paying money illegally to obtain a tenancy
- having lost accommodation provided in connection with employment due to conduct making it inappropriate for the person to reside there
- obtaining, or attempting to obtain, a tenancy fraudulently
- committing, or attempting to commit, tenancy fraud
- knowingly giving false or misleading information, or knowingly withholding relevant information, in an attempt to further an application for housing.

5: Reasonable Preference

- 5.1 When determining allocation priorities, the City Corporation's Allocations Scheme is required by Part VI of the Housing Act 1996 to give 'reasonable preference' to certain categories of people. These are prescribed by the Act and are as follows:
- people who are homeless within the meaning of Part VII of the Housing Act 1996 (including those who are intentionally homeless and those not in priority need)
 - people who are owed a duty by any housing authority under section 190(2), 193(2) or 195(2) of the 1996 Act (or under section 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 insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
 - people who need to move on medical or welfare grounds, including grounds relating to a disability, and
 - people who need to move to a particular locality in the district of the housing authority, where failure to meet that need would cause hardship (to themselves or others).
- 5.2 The City Corporation will award cumulative preference to applicants who meet two or more of the above reasonable preference criteria.
- 5.3 The City Corporation will give additional preference to applicants who meet one of the above reasonable preference criteria and who are:
- at risk of domestic abuse in their current home
 - a witness or victim of crime and at risk of intimidation in the vicinity of their current home
 - harassed, threatened or attacked in their local area
 - former members of the Armed Forces
 - serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service
 - bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner
 - serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service.

6: City Preferences

City Letting Preferences

- 6.1 In addition to those applicants entitled to reasonable preference, the City Corporation will give some preference to eligible and qualifying new applicants who fall into one of the following groups:
- I. Lower income City connection**
- 6.2 The City Corporation will give some preference to those with a City connection who are on a low income. This includes:
- a) People who currently work within the City of London, have done so for at least 24 months and for at least 16 hours per week, and whose household earnings are below the threshold identified in section 6.3.
 - b) People who currently live within the City of London and who are legally responsible for paying the rent for their current accommodation and whose household earnings are below the threshold identified in section 6.3.
 - c) City Corporation and City of London Academies Trust employees, regardless of their location of employment, whose household earnings are below the threshold identified in section 6.3.
 - d) People who neither live nor work within the Square Mile, but who can demonstrate some other substantive connection to the City of London, who have been employed for a minimum of 24 months and for at least 16 hours per week and whose household earnings are below the threshold identified in section 6.3.
- 6.3 The income threshold for 'Lower income City connection' is set in line with the earnings a two full-time worker household earning the National Living Wage would receive. The assessment operates on a financial year basis, before tax and excluding benefits.
- 6.4 As of 1 April 2017, the threshold is £29,640 per year. Subsequent increases in the National Living Wage will automatically be reflected in an increase to this threshold.

II. Sons and daughters of current City Corporation tenants

6.5 The City Corporation will give some preference to the children of current City Corporation tenants. Those applying under this route should:

- currently live in the household of a City Corporation tenant who is, or whose partner is, their parent or legal guardian
- have spent at least two years of their childhood (defined as under 18 years old) in that tenant's household
- have spent their entire adult life to date (defined as 18 years old and over) in that tenant's household apart from periods spent outside the household:
 - to attend university
 - to join the Armed Forces
 - to undergo medical treatment
 - to serve a custodial sentence

6.6 The Universal Credit (Housing Costs Element for claimants aged 18 to 21) (Amendment) Regulations 2017 (2017/252) came into force on 1 April 2017. This removed entitlement to the housing element of Universal Credit (currently Housing Benefit) from young people aged 18-21. This is subject to a number of exemptions including vulnerable young people, young people who are parents themselves, those who may not be able to return home to live with their parents, and those who have been in work for six months prior to making a claim.

6.7 For this reason, those aged between 18 and 21 and wishing to join the Housing Register as a son or daughter of a current City Corporation tenant must pass an affordability check, demonstrating that they either qualify for one of the exemptions to the housing element restriction, or that they will otherwise be able to pay their rent.

III. Retiring City Corporation employees who have been in tied accommodation

6.8 Some City Corporation employees are provided with tied accommodation to help them fulfil their duties. Upon retirement, these employees may be entitled to an alternative offer of accommodation via the waiting list.

6.9 Retiring City Corporation employees who have been in tied accommodation will not receive points and will instead be given

one direct offer of suitable accommodation. See 11.3.VIII for more details.

- 6.10 Retiring employees made an offer of accommodation in this way are ending their tied tenancy and signing a new social tenancy. As such there is no entitlement to Shift Scheme payments.

Low Priority

- 6.11 New applicants who are both eligible and qualifying for an offer of accommodation will always be able to go on the Housing Register. Those who are entitled to neither reasonable preference nor City letting preference will be able to go in the low priority group only.

City Transfer Preferences

6.12 In addition to those transfer applicants entitled to reasonable preference, the City Corporation will give some preference to qualifying transfer applicants who fall into one of the following groups:

I. Decants and returning tenants

6.13 City Corporation tenants who need to leave their homes to enable a major works project to go ahead will be placed in this group. Tenants who are temporarily decanted and have a Right of Return will also be able to bid in this group.

6.14 Tenants who do not need to move due to a decant for at least 12 months will begin with a moderate amount of priority. Priority will be increased for tenants who need to move within 12 months and again for those who need to move within six months.

II. Under-occupying tenants

6.15 City Corporation tenants who are under-occupying their current property and wish to move to more suitable, smaller, accommodation will be placed in this group. Those choosing to downsize may be eligible for a Shift Scheme payment.

6.16 Fixed term tenants, successors and assignees who are required to move to a smaller property upon renewal or transfer of their tenancy will also be placed in this group. They will not be eligible for a Shift Scheme payment.

III. Studio upgrades

6.17 City Corporation tenants occupying studio accommodation and with no other identified housing need will be able to apply for a transfer to a one bedroom home in three circumstances:

- (a) The tenant is aged 45 or over.
- (b) The tenant is a parent whose child does not live with them, but who visits regularly and would stay overnight if there were space. Applications will be prioritised with an award of secondary points for a low welfare need (see 9.45.IV).
- (c) The tenant lives with a spouse, a civil partner, or a partner who has lived in the property continuously for at least one year. Applications will be prioritised with an award of secondary points for one bedroom lacking (see 9.18).

7: Joining the Housing Register

Applying to the Housing Register

- 7.1 To join the Housing Register applicants must complete a housing application form and where appropriate, medical or additional assessment forms.
- 7.2 Applicants who need help with completing the form can request an appointment during office hours with the Housing Needs Team who will be able to help them. See 15.4 for contact details.
- 7.3 Applicants will be asked to provide information and evidence to enable officers to check their eligibility, qualification and preference status. This will usually include:
- photo identification
 - proof of identity for all household members and evidence of their right to live in the UK if they are not British Citizens
 - proof of address for the last five years
 - a recent Council Tax bill for their current address. This may be in the name of a parent or landlord
 - national insurance number
 - proof of their residency in or employment connection to the City
 - proof of savings and bank accounts
 - proof of earnings
 - a passport sized photograph for each main applicant.
- 7.4 If the City Corporation is satisfied that the applicant is eligible to be on the Housing Register, an initial assessment will be made based on the information on the application form and any other information provided.
- 7.5 Applications will normally be processed within 30 working days, once all the required information has been provided in the requested form.
- 7.6 If the information and supporting documents necessary to process the application are not provided within 6 months of the Housing Needs Team receiving the application and there has been no response to reminders for the documents, the application will be cancelled.
- 7.7 All those accepted on to the Housing Register will be assessed and placed in the appropriate bedroom category for their household size and made an award of points based on their circumstances. Applicants will be sent a letter explaining the points awarded to them, their priority date and guidance on how to bid for properties.

7.8 If an applicant feels that their application has been assessed incorrectly under the scheme or relevant circumstances have not been taken into account, they may request a review of the decision and must be able to provide supporting evidence. To request a review, the applicant should write to the Housing Needs Team setting out reasons for requesting a review within ten days of their notification letter.

Application update and renewal

7.9 Applicants must notify the Corporation of any changes in their circumstances as they arise, such as, but not limited to, a new partner, a relationship breakdown, a child leaving home, a new child being born, or a change of address or employment.

7.10 Following an applicant informing the Housing Needs Team of a change of circumstances, the application will be suspended until all necessary proof documents have been provided and a reassessment carried out.

7.11 When an applicant's change of circumstance has been reassessed, this may result in a change in the applicant's points, bedroom need or priority date. If an applicant loses their status as an eligible or qualifying person their application to the Housing Register will be closed. The applicant will be informed of the outcome of the reassessment in writing.

7.12 The Housing Needs Team will also conduct a frequent Census of the Housing Register to confirm applicants details are correct and that all applicants remain eligible.

7.13 The City Corporation will seek to confirm that an applicant is an eligible and qualifying person upon adding them to the Housing Register and, where a long time has elapsed since the original application, again when considering making an allocation.

Duty to provide accurate information

7.14 As part of their application, all applicants will be required to sign a declaration giving the Housing Needs Team permission to make investigations into their application. This will include use of the National Fraud Initiative database and may include credit check agencies.

7.15 Under Section 171 of the Housing Act 1996, it is a criminal offence for an applicant to knowingly give false information or to withhold information relevant to their application. A fine may be imposed by the courts if the applicant is found guilty.

7.16 This applies if:

- an applicant knowingly or recklessly makes a statement which is false in a material particular
- knowingly withholds information which the City Corporation has reasonably required the applicant to give in connection with the exercise of its functions.

7.17 This applies at all stages of the application. If there is significant change in the applicant's housing circumstances then there is an obligation on them to inform the City Corporation.

7.18 An applicant found to be submitting false statements or providing false evidence may be excluded from the Housing Register for a period of 10 years.

7.19 An applicant convicted of social housing fraud with any registered provider will be excluded from the Housing Register for a period of at least 15 years.

8: Assessing Household Size

Who can be included in an application?

- 8.1 When assessing the size and type of housing an applicant requires, the City Corporation will only consider the applicant and their partner, their children and any other person who needs to live in the household to provide or receive care. While other family members are able to join the household, their needs will not be reflected in the size and type of housing offered.
- 8.2 A partner will be considered where they have lived with the applicant in a permanent relationship for at least 12 months or if they are married to or in a civil partnership with the applicant.
- 8.3 All dependent children currently living with the applicant or their partner will be considered.
- 8.4 Dependent children who are not currently living with the applicant or their partner will be considered, where the applicant or their partner has a legal care responsibility for the child (e.g. guardianship or a residence order) amounting to 50 per cent of the time.
- 8.5 Adult children currently living with the applicant or their partner will be considered, providing they have spent their entire adult life (defined as 18 years old and over) to date in their parent's household apart from periods spent outside the household:
- o to attend university
 - o to join the Armed Forces
 - o to undergo medical treatment
 - o to serve a custodial sentence
- 8.6 Adult children who meet the criteria set out in 8.5 can have their own partners and children considered, providing the partner or child meets the criteria set out in 8.2, 8.3, 8.4 or 8.5, substituting the words 'applicant or their partner' for 'relevant adult child or their partner'.
- 8.7 A person who needs to join the applicant's household to provide or receive care can be considered. The person receiving care must be unable to live independently and there must be no other options available for their care. The City Corporation will seek an assessment and recommendation from its independent medical assessor or the Adult Social Care Service Manager to confirm this.

The City Corporation's Bedroom Standard

- 8.8 Applicants will be assigned a bedroom need based on the number of people on their application accepted as part of the household. The City Corporation generally assesses the number of bedrooms needed as follows:
- one bedroom for the applicant (and their partner)
 - one bedroom for any additional adult couple
 - one bedroom for any two additional people of the same gender aged under 18
 - one bedroom for any two additional people of different genders aged 9 and under
 - one bedroom for any additional person.
- 8.9 A household containing two or more people will be assessed as requiring a living room. Regardless of whether or not a living room is used by a household as sleeping accommodation, it will not be counted as a bedroom for the purposes of assessing a household's needs.
- 8.10 Single applicants normally qualify for a studio property only. However, single applicants will be assessed as requiring a one bedroom flat if they are parents whose children do not live with them but who visit regularly and who would stay overnight if there was space to do.
- 8.11 Applicants will be assigned a larger bedroom need than is suggested above if this is the outcome of a medical or additional needs assessment. This could apply in, although is not limited to, situations where:
- a household member requires overnight care;
 - a household member's disability or medical condition means it is not reasonable for them to share a bedroom with a partner or sibling;
 - to enable a fostering arrangement or adoption to take place.
- 8.12 In most cases, applicants will only be considered for properties that have the correct number of bedrooms for their household size as determined by the City Corporation's Bedroom Standard. There are a number of exceptions to this listed below:
- 8.13 The City Corporation does not have any properties with five or more bedrooms. Households who require five or more bedrooms will be able to bid for four bedroom homes.

- 8.14 A household made up of either a couple and a child under 12 months, or a single parent and a child under 12 months, will be entitled to a two bedroom home under the Bedroom Standard. They can also bid for one bedroom homes until the child reaches 12 months.
- 8.15 Where the City Corporation agrees to move a tenant under a Management Transfer or a Decant, we will aim to provide a property that is suitable for the household's needs. However, these groups have an urgent need to move away from their current accommodation. Applicants may bid on, and may receive Direct Offers for, properties that are similar to their current homes. Any such offer will not disadvantage a pre-existing transfer application.
- 8.16 For example, a household is overcrowded in a two bedroom home and is on the transfer list. A Management Transfer is agreed due to their suffering ASB. Although the household are eligible for a three bedroom home, they may also bid on and may be given a Direct Offer for, a two bedroom home. In this case, their transfer application for a larger property would remain open with their original priority date.
- 8.17 Applicants who need to move under a Management Transfer or a Decant will not be able to bid on, or receive a Direct Offer for, a property larger their assessed bedroom need, even if that home would be more similar to the property they currently occupy. Households who lose a bedroom may be eligible for a Shift Scheme payment.

9: Priority for Housing

- 9.1 Households accepted onto the Housing Register will be made an award of primary points which reflects their level of priority for housing. Primary points groups correspond to reasonable preference groups, City letting preferences and City transfer preferences. The points awarded reflect the aims of this policy and the preference the City Corporation is required by law to give to certain categories of need.
- 9.2 Where a household falls into more than one primary points group, they will be allocated to the group that receives the highest primary points award. The exceptions to this are households accepted as homeless, who must remain in the homeless primary points group, and households subject to a decant, who must remain within either the decant primary points group or the under-occupation primary points group.
- 9.3 Secondary points will be added to a household's points total to reflect cumulative preference (households that fall into more than one reasonable preference group) additional preference (prioritising households with certain circumstances) or other identified priorities.

Primary Points

- 9.4 Households accepted onto the Housing Register will be made an award of primary points that corresponds to the highest reasonable preference group, local letting or transfer priority into which they fit. The primary points groups are set out below.
- 9.5 **Management Transfer (800 Points)**
City Corporation tenants with an evidenced critical need to move, such as a need to flee threatened or actual domestic or other violence or harassment, or tenants with an exceptional or life threatening medical need to move will be placed in this group. This is a time limited band and all applicants in this band will be kept under review. Only one reasonable offer of accommodation will be made to applicants in this group (see 11.5).
- 9.6 **Under-occupation (400 Points)**
City Corporation tenants who are under-occupying their current property and wish to move to more suitable, smaller, accommodation will be placed in this group. Fixed term tenants and successors and assignees who are required to move to a smaller property upon renewal or transfer of their tenancy will also be placed here.
- 9.7 **Severe Medical or Welfare Needs (275 Points)**
A detailed description of medical and welfare needs is given in 9.33 - 9.45.

- 9.8 **Severe Overcrowding** **(250 Points)**
Households who are lacking two or more bedrooms according to the City Corporation's bedroom standard will be placed in this group.
- 9.9 **Studio Upgrade** **(250 Points)**
City Corporation tenants in studio flats who meet the criteria set out in either section 6.17 (a), (b) or (c) will be placed in this group and will be able to bid for a one bedroom home.
- 9.10 **Decants and Returning Tenants** **(225 Points)**
City Corporation tenants who need to leave their homes to enable a major works project to go ahead will be placed in this group. Tenants who are temporarily decanted and have a Right of Return to their original estate will also be able to bid in this group. Tenants subject to a decant must remain within either this group or the under-occupation group. Urgent decants will be prioritised with the addition of the extra points available in 9.32.
- 9.11 **Moderate Medical or Welfare Needs** **(225 Points)**
A detailed description of medical and welfare needs is given in 9.33 - 9.45.
- 9.12 **Moderate Overcrowding** **(200 Points)**
Households who are lacking one bedroom according to the City Corporation's bedroom standard will be placed in this group.
- 9.13 **Homeless** **(140 Points)**
Homeless applicants who have been assessed as being both homeless and eligible for assistance will be placed in this group. Applicants must remain within this group, but cumulative preference can be recognised through secondary points.
- 9.14 **Lower income City connection** **(100 Points)**
New applicants who meet who meet the criteria set out in either section 6.2 (a), (b), (c) or (d) and whose earnings are less than the threshold identified in 6.3 will be placed in this group.
- 9.15 **Sons and Daughters** **(50 Points)**
Sons and Daughters of current City Corporation tenants who meet the criteria set out in 6.5 will be placed in this group.
- 9.16 **Low Priority** **(1 Point)**
Applicants who are both eligible and qualifying but do not meet any reasonable or local letting preference criteria will be placed in this group. The City Corporation does not operate like for like transfers and this group is not open to current tenants.

Secondary Points

9.17 In addition to the primary points awarded above, additional points are awarded in the cases set out below. Not all secondary points are applicable to each primary points group. A description of the points available to each group is set out in the Points Matrix in section 9.46.

Overcrowding

- 9.18 **Per Bedroom Lacking** **(25 Points)**
Applicants who are overcrowded but who qualify for a higher primary points group or who are homeless will be awarded additional points per bedroom lacking.
- 9.19 **Mixed Sibling Sharing** **(10 Points)**
Where a household's overcrowding forces two or more siblings (or children under guardianship) of different genders, at least one of whom is age ten or over, to share a bedroom, these additional points will be awarded.

Wellbeing

- 9.20 **Medical - Severe** **(50 Points)**
A detailed description of medical need is given in 9.33 – 9.39.
- 9.21 **Medical - Moderate** **(25 Points)**
A detailed description of medical need is given in 9.33 – 9.39.
- 9.22 **Medical – Low** **(10 Points)**
A detailed description of medical need is given in 9.33 – 9.39.
- 9.23 **Welfare - Severe** **(50 Points)**
A detailed description of welfare need is given in 9.40 – 9.45.
- 9.24 **Welfare - Moderate** **(25 Points)**
A detailed description of welfare need is given in 9.40 – 9.45.
- 9.25 **Welfare – Low** **(10 Points)**
A detailed description of welfare need is given in 9.40 – 9.45.

Unsuitable Housing Conditions

- 9.26 **Sharing Accommodation**
Applicants who share the communal parts of their current accommodation with people outside of their normal household will be awarded these secondary points. Points are available on the following basis:

- sharing with family **(5 Points)**
- sharing with 1-4 non-family members **(10 Points)**
- sharing with 5+ non-family members. **(15 Points)**

9.27 **Without Tenancy** **(5 Points)**
 Applicants without a tenancy agreement for their current home will be awarded these secondary points.

9.28 **Bedroom Cap** **(50 Points)**
 Under-occupiers affected by the removal of the spare room subsidy will be prioritised over other tenants looking to downsize with an award of these secondary points.

9.29 **Long Temporary Accommodation Stay** **(150 Points)**
 Homeless households who have spent longer than twelve months in temporary accommodation provided by the City Corporation and who have been actively but unsuccessfully bidding on suitable properties will have their applications given additional priority with these secondary points.

Housing Management

9.30 **Advice and Engagement** **(15 Points)**
 Applicants whose current housing is severely unsuitable, either for their medical or welfare needs, or because of overcrowding, will be invited to develop a Personal Housing Plan with the Advice & Homelessness Officer. This will look at other ways in which applicants may resolve their housing needs besides the housing waiting list. Applicants who engage with this advice and are still unable to resolve their housing needs will be given additional priority with these secondary points.

9.31 **Intentionality** **(minus 50 Points)**
 Households who have deliberately and consciously done something, or failed to do something, that has contributed to their current housing needs will have their priority reduced by the deduction of these secondary points. This may include an applicant:

- Having applied for assistance under the Housing Act 1996 and been found intentionally homeless;
- Having moved into unsuitable accommodation to attract or increase priority for re-housing. This will apply when an applicant chose to occupy unsuitable accommodation when suitable and affordable accommodation was likely to be available to them;

9.38 Medical priority will be kept under review and may change if:

- the applicant moves to another property
- there is a material change in the medical condition of an applicant or other member of the household
- the condition is acute and the applicant had been awaiting treatment and the treatment is now complete, thereby resolving the medical need.

9.39 There are five possible outcomes to a medical assessment:

I. Management Transfer

This will only be awarded to current City Corporation tenants who have an exceptional or immediately life threatening medical need to move. This award will always result in the applicant being awarded the primary points available in 9.5.

II. Severe Medical Need

This will be awarded to:

- Households where it is assessed that current housing conditions are having a major adverse effect on the relevant household member's medical condition. It will not apply where the effect is moderate, variable or slight.
- Existing or former members of the Armed or Reserve Forces who are suffering from a serious injury, illness, or disability which is wholly or partly attributable to their service (this applies to new applicants regardless of their current housing conditions).
- Applicants who require adapted housing and/or extra facilities, which it is impractical to provide within their current accommodation.
- Households where two household members are assessed as having a moderate medical need.

This award will either result in the applicant being awarded the primary points available in 9.7 or, if the applicant simultaneously qualifies for a higher award of primary points, an award of the secondary points available in 9.20.

III. Moderate Medical Need

This will be awarded to:

- Households where it is assessed that current housing conditions are having a moderate or variable adverse effect on the relevant household member's medical condition. It will not apply where the effect is slight.
- Households where two household members are assessed as having a low medical need.

This award will either result in the applicant being awarded the primary points available in 9.11 or, if the applicant simultaneously qualifies for a higher award of primary points, an award of the secondary points available in 9.21.

IV. Low Medical Need

This will be awarded to:

- Households where it is assessed that current housing conditions are having a slight adverse effect on the relevant household member's medical condition.

This award will not result in an entitlement to reasonable preference and applicants with no other housing need will remain in the low priority group described in 9.16. All applicants can have their low medical needs recognised by an award of the secondary points available in 9.22.

V. No Medical Need

Households where it is assessed that current housing conditions are having a minimal adverse effect on the applicant's or a member of their household's medical condition will not be entitled to any additional priority.

Welfare Priority

- 9.40 Welfare points are awarded if the City Corporation considers that housing or other circumstances are affecting the welfare needs of the applicant or a member of their household.
- 9.41 Applicants wishing to apply for additional welfare priority should complete an additional assessment form and provide appropriate documentary evidence. This will be assessed by Housing Needs Officers, in liaison with social services, estate officers, the Police and other support agencies as appropriate.
- 9.42 As part of the assessment for welfare priority consideration will be given to the suitability of the current property and any adaptations that have been carried out. If the housing need is met by the adaptations, or

could be met by further alterations, welfare priority may not be awarded.

- 9.43 A maximum of one award of welfare priority will be made per situation. Where a welfare issue affects multiple members of the same household, only one award of welfare priority will be made. Where one household member is affected by two or more independent welfare issues, multiple awards can be made to the same individual.
- 9.44 For example, a couple who both need to move to provide unpaid care for an elderly relative will receive one grant of welfare priority. Two household members are affected, but the same situation is being shared. Conversely, a single applicant who is both inhabiting severely insanitary accommodation and is a former member of the Armed Forces can receive two awards of welfare priority. The two situations are independent of each other.
- 9.45 There are five possible outcomes to a welfare assessment, which are listed below. The examples offered for each category are by no means exhaustive. When assessing welfare issues not listed here, officers should compare the case before them with the examples provided and decide with which group it fits most closely.

I. Management Transfer

This will only be awarded to current City Corporation tenants who have an evidenced need to flee threatened or actual domestic or other violence or harassment. This award will always result in the applicant being awarded the primary points available in 9.5.

II. Severe Welfare Need

This will be awarded to households whose welfare needs are comparable to those listed below:

- Where an applicant or a member of their household has to move in order to be near a person to whom they give or receive care and support. This level of priority will be given where the absence of care and support would have a major adverse effect on the relevant person's wellbeing and independence. An example of this would be a person who may need to move into a residential or nursing care home if the care and support was absent.
- Where it is necessary to move because of the threat of violence or harassment, including domestic and sexual violence, witnesses or victims of crime at risk of intimidation, or an applicant harassed, threatened or attacked in their local

area. An award of severe welfare priority will only be made if a Management Transfer or homeless application are not appropriate solutions. This level of priority can also be given to those who are homeless as a result of violence or harassment and require urgent re-housing.

- Where an applicant is a foster carer or is approved to adopt and needs to move to a larger home in order to accommodate a looked after child or a child who was previously looked after by a local authority. This category also includes those who are in the process of being assessed for approval to foster or adopt and would need a larger home in order to accommodate a child. Should such an application be turned down, or should the applicant withdraw their application, priority for rehousing would be reconsidered.
- Where an applicant requires a larger home to adequately accommodate a child as a result of being a special guardian, holding a family arrangements order, holding a historical residence order or as a family and friends carer who is not a foster carer but who has taken on the care of a child because the parents are unable to provide care.
- Where a household occupies severely insanitary accommodation. This is defined as accommodation that is assessed as containing a Category 1 Band A hazard (apart from Crowding and Space) under the Housing Health and Safety Rating System (HHSRS). The relevant Environmental Health Officer must also confirm that they are of the opinion that the defect is unlikely to be remedied in a reasonable timeframe.
- Where a household is assessed as being affected by two independent moderate welfare needs.

This award will either result in the applicant being awarded the primary points available in 9.7 or, if the applicant simultaneously qualifies for a higher award of primary points, an award of the secondary points available in 9.23.

III. Moderate Welfare Need

This will be awarded to households whose welfare needs are comparable to those listed below:

- Where an applicant or a member of their household has to move in order to be near a person to whom they give or receive care and support. This level of priority will be given

where the absence of that care and support would have a moderate or variable adverse effect on the relevant person's wellbeing and independence. An example of this would be a person who may require a care package from Adult Social Care if the informal care and support was absent.

- Bereaved spouses or civil partners of those serving in the Regular Forces where (i) the bereaved spouse or civil partner has recently ceased or will cease to be entitled, to reside in Ministry of Defence accommodation following the death of their service spouse or civil partner and (ii) the death was wholly or partly attributable to their service.
- Where there is a need for the applicant to move away from the immediate area because they are vulnerable. An example of this would be an applicant who had a substance abuse issue and has successfully completed a rehabilitation programme, but is at risk of relapse due to associations in their current area.
- Where there is a need to provide independent accommodation in the community for those who could not be expected to find their own accommodation, such as young adults with learning disabilities (those moving on from supported accommodation will be prioritised in section 11.3.VII).
- Where a household is assessed as being affected by two independent low welfare needs.

This award will either result in the applicant being awarded the primary points available in 9.11 or, if the applicant simultaneously qualifies for a higher award of primary points, an award of the secondary points available in 9.24.

IV. Low Welfare Need

This will be awarded to households whose welfare needs are comparable to those listed below:

- Where an applicant or a member of their household has to move in order to be near a person to whom they give or receive care and support. This level of priority will be given where the absence of that care and support would have a slight effect on the relevant person's wellbeing and independence. An example of this would be a person who would not require a care package from Adult Social Care if the informal care and support was absent, but where that

care and support still enhances the relevant person's wellbeing and independence.

- Those who are currently serving in the regular armed forces or who were serving in the regular forces at any time in the five years preceding their application for an application of social housing.
- Where the applicant is unable to live with their partner (as defined in 8.2) or a dependent child (as defined in 8.3 and 8.4) due to a lack of suitable accommodation.
- Where the applicant is a parent whose child does not live with them, but where the child is unable to visit the applicant due to a lack of space in their current accommodation (for example a studio flat or homeless hostel).
- Homeless applicants found to be in priority need under Part VII of the Housing Act 1996.
- Families in severely overcrowded homes which pose a serious health hazard (Part X Housing Act 1985 or HHSRS Band A). These points are awarded in addition to any overcrowding points that are due and are intended to give additional preference to the most severe cases.

This award does not result in an entitlement to reasonable preference and applicants with no other housing need will remain in the low priority group described in 9.16. All applicants can have their low welfare needs recognised by an award of the secondary points available in 9.25.

V. No Welfare Need

Households where it is assessed that current housing conditions are having a minimal adverse effect on the applicant's or a member of their household's welfare will not be entitled to any additional priority.

The Points Matrix

9.46 The primary and secondary points described in 9.4 – 9.45 are presented in the matrix table below. The table also indicates which primary points groups may receive awards of which secondary points.

City of London Allocations Scheme		Secondary Points																
Primary Group	Primary Points	Overcrowding		Wellbeing						Unsuitable Housing Conditions					Housing Management			
		Per room lacking	Mixed sharing	Medical			Welfare			Sharing			Lack of tenancy	Bedroom Cap	Long TA stay	Advice & Engagement	Intentionality	Decant Urgency
				S	M	L	S	M	L	F	1-4	5+						
Management Transfer	800																	
Under-occupation	400			50	25	10	50	25	10					50				100 / 200
Severe Medical / Welfare	275	25	10	50	25	10	50	25	10	5	10	15	5			15	minus 50	
Severe Overcrowding	250	25	10		25	10		25	10	5	10	15	5			15	minus 50	
Studio Upgrade	250	25			25	10		25	10									
Decants	225	25	10	50	25	10	50	25	10									100 / 200
Moderate Medical / Welfare	225	25	10		25	10		25	10	5	10	15	5				minus 50	
Moderate Overcrowding	200		10			10			10	5	10	15	5				minus 50	
Homeless	140	25	10	50	25	10	50	25	10						150		minus 50	
Lower Income City Connection	100					10			10	5	10	15	5					
Sons and Daughters	50					10			10									
Low Priority	1					10			10	5	10	15	5					

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Secondary Wellbeing Points: S = Severe M = Moderate L = Low

Secondary Sharing Points: F = with family 1-4 = with 1-4 non-family 5+ = with 5+ non family

	A green background indicates that points are routinely available for applicants in this primary points group
	A yellow background indicates that points are available to applicants in this primary points group in exceptional circumstances only (described below)
	A red background indicates that points are unavailable to applicants in this primary points group
	A blue background indicates that applicants who qualify for these secondary points will instead automatically be rebanded into a higher primary points group

- a) The circumstances in which secondary medical or welfare points can be awarded to applicants with medical or welfare primary points are described in 9.37, 9.43 and 9.44.
- b) All applicants in the Severe Overcrowding group have at least two bedrooms lacking. Therefore secondary points for 'per room lacking' will only be awarded for the third and any subsequent bedrooms lacking.
- c) Couples registered for a Studio Upgrade will receive secondary points for one bedroom lacking.
- d) The law requires temporary accommodation to be suitable for a homeless household's needs. This means that severe overcrowding, medical and welfare issues should not arise for households in temporary accommodation. Where they do arise secondary points may be awarded to reflect this. The City Corporation will, whenever possible, offer alternative temporary accommodation.

Prioritising Applicants

- 9.47 When a property becomes available for letting, Housing Needs Officers will first determine whether it is suitable for any applicant on the list for a Direct Offer (see section 11). Generally, a property suitable for a Direct Offer applicant will be offered to them. Alternatively it will be advertised to applicants registered for Choice Based Lettings.
- 9.48 Applicants registered for Choice Based Lettings will be able to place bids following the process outlined in section 10.
- 9.49 Once the bidding cycle is complete, Housing Needs Officers will create a shortlist of applicants who may be able to view the property. The shortlist will prioritise the applicants with the highest points totals.
- 9.50 Where two or more applicants have equal points totals, officers will prioritise the application with the earliest priority date.
- 9.51 A priority date is normally the date an applicant was first registered into their current primary points group.
- 9.52 If an applicant moves into a higher primary points group at any stage, their priority date will be reset to the date they moved into the higher group. If the applicant later moves back down to the lower group, their priority date will revert to the date that applied when they were previously in that lower group.
- 9.53 For example, an applicant joins the Sons and Daughters group on 01/01/2016 and this is their priority date. They later accept a job in the City earning £14,000. On 01/01/2017 they are moved up into the lower income City connection group and this is their new priority date. On 01/01/2018 they give up this employment. Lower income City worker priority no longer applies and they must revert to the Sons and Daughters group. They can also revert to their original priority date for this group, 01/01/2016.
- 9.54 There is an exception to this rule for the Homeless primary points group. An applicant's priority date will automatically be reset to the date their homeless application was decided, even if they were previously in a higher primary points group and had an earlier priority date.
- 9.55 Decants and returning tenants also calculate their priority dates differently. Their priority date will be the date they signed their tenancy agreement at the property they are being (or in the case of returning tenants, were) decanted from. This gives greater priority to those who experience more disruption from the decanting process.

10: The Lettings Process

10.1 Applicants who are accepted onto the Housing Register (and who are not excluded from bidding in 11.3) will be able to express an interest in a suitable vacancy by making a bid. A guide to Choice Based Lettings explaining the bidding process will be sent to all applicants who are registered for Choice Based Lettings.

10.2 Vacancies will usually be advertised in the following locations:

- the City Home Connections website
www.homeconnections.org.uk
- the City of London Corporation Estates Offices

Each vacancy will have information on the location, size and type of property, rent and service charge levels and any criteria which applicants must satisfy in order to be eligible for shortlisting.

10.3 Each bidding cycle begins on a Thursday morning and closes the following Monday at one minute to midnight. There will not always be properties available for bidding.

10.4 Applicants who bid for a property will be prioritised based on the criteria detailed in section 9.47-9.53. The applicants with the highest priority will be shortlisted to view the property.

10.5 Applicants will not be able to express an interest in a vacancy for which they are not eligible. An applicant will be excluded from a shortlist on the following grounds:

- the applicant is not eligible in accordance with the bedroom standard and type of accommodation
- the applicant does not satisfy the advertising criteria included in the advert
- the applicant is under investigation for fraud
- the applicant is a transfer tenant with high rent arrears
- the applicant has notified the Housing Needs Team about a change of circumstances but is yet to provide adequate proof.

10.6 The Housing Needs Team will be responsible for contacting successful applicants, normally within five working days with additional detail of the property, a potential tenancy commencement date and details of how to view the property.

10.7 If the applicant with the highest priority on a shortlist refuses the offer, cannot be contacted or does not arrange to view the property within

five working days, unless otherwise agreed, then the property will be offered to the next eligible applicant on the shortlist.

Choice Based Lettings Refusal Policy

- 10.8 Applicants are expected to accept or reject an offer of a property at the time of viewing. Applicants who refuse three offers of suitable properties, for which they have bid, will have their application reconsidered. If the City Corporation believes that all offers were reasonable for the applicant, then the applicant will either not be able to bid for properties for a 12 month period or will have their application cancelled. The 12 month period will begin at the date of the refusal of the third property or the date of any subsequent reconsideration or review decision.
- 10.9 The Corporation will discharge its statutory duty if applicants who have been placed in temporary accommodation, provided by the Corporation refuse one offer of suitable accommodation. This could be social or private rented housing.
- 10.10 Applicants who have been awarded additional points due to their current unsuitable accommodation and who refuse a suitable and reasonable offer of accommodation may have their points reduced as per 9.31.
- 10.11 Applicants have the right to request a review or reconsideration of any decisions to suspend bidding or remove priority (see 15.1 to 15.3).
- 10.12 Applicants who are made one suitable and reasonable Direct Offer of a property and refuse it will normally not be considered for another Direct Offer. The Direct Offer refusal policy is discussed in more detail in 11.5 – 11.9.

Allocation to Housing Association Homes

- 10.13 Housing association homes to which the City Corporation has nomination rights will be advertised in the same way as City Corporation properties. Where an applicant is successful they will be subject to the lettings policies and procedures of that housing association, including their assessment of bedroom needs and affordability requirements.
- 10.14 Applicants who take up a tenancy through a nomination to a housing association will have their application to the City Corporation's Housing Register closed.

Help with registering and bidding for properties

- 10.15 Some applicants may need help with registering for housing and bidding for properties. The housing register application form includes a question asking whether an applicant may have difficulty in applying and bidding for a property themselves and whether they have someone who can help them.
- 10.16 Officers will work with the applicant to identify someone appropriate who will act as their nominated helper. Applicants who need help or training to register or bid for properties should contact the Housing Needs Team using the contact details at the end of this document.

Signing a tenancy

- 10.17 All City Corporation tenants will be given an introductory tenancy, normally for a period of 12 months. If there are no breaches of the tenancy agreement and no rent arrears at the end of the 12 month period, the tenancy will be converted into a secure or a fixed term tenancy. Further information is available in the City Corporation's Tenancy Policy.
- 10.18 New tenants will be asked to pay four weeks rent in advance at the time they sign their tenancy agreement, at which stage they will be given the keys to the property.
- 10.19 Transferring tenants will be expected to clear any outstanding rent arrears for their current property before a tenancy agreement for a new property will be offered.
- 10.20 All City Corporation properties are unfurnished and do not include white goods, curtains or floor coverings.

11: Allocations made outside of this process

Direct Offers

- 11.1 The Corporation will aim to maintain the integrity of the allocation of property as set out above. However, there will be occasions where properties are not advertised via Choice Based Lettings and direct allocations are made to applicants who have not made bids.
- 11.2 The following categories of applicant will be awarded points and will be able to bid but may also be made one direct offer of accommodation:
- I. **Specialist medical needs**
One direct offer may be made where the applicant requires specialist or adapted accommodation, or a ground floor or stair free property and a suitable unit has been identified.
 - II. **Managing temporary accommodation**
One direct offer may be made to homeless households where this is necessary to manage the use of temporary accommodation and to enable the City Corporation to meet its statutory homeless duties.
 - III. **Management transfers**
One direct offer may be made to any applicant who has a City connection and who faces a critical and immediate need to move to avoid hardship.
- 11.3 The following categories of applicant will not be awarded points, will not be able to bid and will only receive an offer of accommodation by direct offer:
- IV. **Sheltered accommodation**
The City Corporation does not operate a Choice Based Lettings system for sheltered accommodation. Applicants for sheltered accommodation will receive one direct offer of suitable accommodation. Further information is available in section 13.
 - V. **Care leavers**
Young people who have been looked after by the City Corporation and placed in care for thirteen weeks or more prior to their eighteenth birthday, who now require independent accommodation, will receive one direct offer of suitable accommodation.

During the application process they will meet with a member of the Housing Needs Team, along with their Social Worker, to discuss their requirements.

VI. Exceptional support needs

The Housing Register is aimed at households seeking general needs social housing or low support sheltered/retirement housing.

If the City Corporation determines that an applicant would not be able to maintain a social tenancy in an appropriate manner because of the extent of their support needs, and support needs were so high that support could not be provided in the property, then the applicant may instead be made one direct offer of suitable supported housing or referred to Adult Social Care for assessment.

During the application process they will meet with a member of the Housing Needs Team, along with their Social Worker, to discuss their requirements.

If general needs housing later becomes suitable for the applicant, they may re-join the register and will be eligible for a direct offer under 11.3.VII.

VII. Move-on from supported housing

Applicants who have lived in supported housing and who are now ready and able to maintain a social tenancy in an appropriate manner will be made one direct offer of suitable general needs housing.

During the application process they will meet with a member of the Housing Needs Team, along with their Social Worker, to discuss their requirements.

VIII. Tied accommodation

Retiring City of London workers who have been in tied accommodation and who are entitled to local letting preference under section 6.8 – 6.10 will be made one direct offer of suitable accommodation.

IX. Right to Move

The City Corporation may be approached by a tenant in social housing in another area who is seeking a move in order to avoid hardship and to take up work or be closer to work. The City Corporation will in any single financial year make up to one per cent of its voids available to this group. Hardship and

employment or the offer of employment must be verified. Where the City Corporation agrees to accommodate such a household, one direct offer of a suitable property will be made.

X. Reciprocal agreements

From time to time the City Corporation may agree to offer accommodation to a household on another housing authority's waiting list, in exchange for nomination rights to a similar home in that authority's housing stock. Any such households will receive one direct offer of suitable accommodation.

- 11.4 In cases where a direct offer of accommodation is to be made, officers will consult applicants on their preferences on the type and location of accommodation and will aim to provide an offer that meets these preferences where possible.

Direct Offers Refusal Policy

- 11.5 In most cases, only one Direct Offer will be made. As per the refusal policy (see 10.8 – 10.12) applicants who are made one suitable and reasonable Direct Offer of a property and refuse it will normally not be considered for another Direct Offer.
- 11.6 Applicants who refuse a suitable Direct Offer under 11.2.I or 11.2.III will still be able to bid through Choice Based Lettings but will not normally be made another Direct Offer and may see their priority reduced as per 10.10 and 9.31.
- 11.7 The Corporation will discharge its duty to applicants who refuse a suitable Direct Offer under 11.2.II as per 10.9.
- 11.8 Applicants who refuse a suitable Direct Offer under 11.3 will have their applications reassessed. If they are a qualifying person and can demonstrate sufficient preference, they will be able to bid for a home through Choice Based Lettings. Applicants who are either do not qualify or do not have sufficient preference will have their applications closed.
- 11.9 Applicants have the right to request a review or reconsideration of any decisions to suspend bidding or remove priority (see 15.1 to 15.3).

12: Statutory homeless households

- 12.1 The City Corporation will give households to whom it owes a full homelessness duty (under Part VII of the Housing Act 1996) reasonable preference within this policy.
- 12.2 Homeless households who are not in priority need will receive an award of the primary points available in 9.13.
- 12.3 Homeless households who are in priority need and are not intentionally homeless will receive an award of the primary points available in 9.13 and the secondary points available in 9.25.
- 12.4 Homeless households who are in priority need but are intentionally homeless will receive an award of the primary points available in 9.13 and the secondary points available in 9.25, less the secondary points deductible in 9.31.
- 12.5 The full homeless duty will be discharged if a homeless applicant successfully bids for a property. However, in line with its Homelessness Strategy, the City Corporation will also seek to discharge its full homelessness duty where it can secure a reasonable offer of accommodation in the private rented sector. In this circumstance the household's Housing Register application will be suspended for two years, after which it will be closed, or reactivated should the private rented sector tenancy come to an end during this period, through no fault of the tenant.

13: Older people's housing

- 13.1 The City Corporation does not operate a Choice Based Lettings system for sheltered accommodation and lettings to older people's housing are handled separately from general needs social housing.
- 13.2 The eligibility rules set out in section 3 are the same for applicants for sheltered accommodation.
- 13.3 Applicants for sheltered accommodation must meet a reduced set of qualifying criteria. These are as follows:
- Both male and female applicants must be over the State Pension age for women
 - Neither the applicant, nor any member of their household, owns in full or in part, a property in the UK or abroad, which they are not selling prior to taking up an offer of sheltered accommodation
 - Neither the applicant, nor their partner, holds, a secure, assured, flexible or introductory tenancy with another social landlord, which they do not intend to surrender upon taking up an offer of sheltered accommodation
 - Neither the applicant, nor any member of their household, should have demonstrated unacceptable behaviour (see 4.5)
- 13.4 The City Corporation does not require applicants for sheltered accommodation to demonstrate a local connection. However, housing association homes to which the City Corporation has nomination rights will require proof of a local connection before offering a tenancy agreement.
- 13.5 Applicants for sheltered accommodation do not need to demonstrate that they are entitled to preference. All eligible and qualifying applicants will be accepted on to the waiting list.
- 13.6 Points are not awarded to applications for sheltered accommodation. Accepted applicants will be placed on a waiting list and direct offers of suitable accommodation will be made to applicants who have been on the waiting list for the longest time.
- 13.7 Applicants with an urgent need to move, such as those with a specific medical or welfare need, or those who are homeless or threatened with homelessness, will be prioritised.
- 13.8 Applicants who meet the allocations criteria for both general needs housing and sheltered housing may choose which waiting list they would prefer to be on.

13.9 Lettings in the City of London Almshouses are not covered by this policy. For information on the City of London Almshouses, including how to apply for housing, please contact the Housing Needs Team on the details given in 15.4.

14: Local Lettings Plans

- 14.1 Section 167 (2E) of the Housing Act 1996 (as amended by the Homelessness Act 2002) enables housing authorities to adopt Local Lettings Policies and Plans. The Code of Guidance states that these lettings plans could enable a housing authority to allocate to specific groups, whether or not they fall into the reasonable preference categories. However, it also states that reasonable preference categories must be taken into account overall and that local lettings plans should not discriminate either directly or indirectly on any equality grounds.
- 14.2 The City Corporation may seek to develop local lettings plans for new build properties to allow flexibility to make lettings outside of the overarching allocations policy in line with the agreed local lettings plan.
- 14.3 Where the City Corporation considers that there is specific need to respond to local conditions, it will engage in and support the development of local lettings policies within its housing stock.
- 14.4 These policies will normally be time limited and the objectives may include targets to:
- increase the number of lets to those in employment or training
 - lower child density or balance the number and ages of children to avoid a large concentration of older or younger children
 - make the best use of stock allowing a level of under-occupation / over-crowding
 - enable new schemes to be allocated to a mixture of tenants in order to develop a sustainable community
 - enable the City to manage particular business needs
 - enable households to return to an area they left following a decant to allow redevelopment to take place.
- 14.5 This list is not exhaustive and local lettings plans may be agreed in other circumstances where there is evidence that the local community would benefit from such a plan and there is no significant adverse impact on other communities.
- 14.6 All local lettings and scheme-specific plans will be subject to formal approval. Each will have clear criteria and possibly their own qualification requirements, which are openly published. When a property which is being advertised is subject to a local lettings plan, this will be stated clearly.

- 14.7 Any local lettings plan will be agreed for a limited time, after which it will be reviewed, and lettings will revert to the main allocations scheme if appropriate.

15: Reviews, Complaints and Advice

Reviews and Reconsiderations

- 15.1 Applicants can request a review or a reconsideration of a decision concerning their housing register application, allocation scheme decision or suspension from bidding.
- 15.2 A review is a request for the same information to be reviewed by a more senior member of staff. A reconsideration is a request to reopen the decision making process based on new information. Applicants must make a request in writing, to the Housing Needs Team at the address below:

The Housing Needs Manager
Housing Needs Team
Barbican Estate Office
3 Lauderdale Place
London
EC2Y 8EN

hadvice@cityoflondon.gov.uk

- 15.3 A request for a review or reconsideration must be made within ten working days of the applicant being informed of the relevant decision. Should an applicant require more time to provide new information, they should request a reconsideration within ten working days and agree a timescale for providing further information with the Housing Needs Team.

Complaints

- 15.4 The City Corporation is committed to providing you with the best possible service and to working with you to find a solution to your housing needs. If, however, you are not happy with the service you have received from us, you can make a complaint by emailing housing.complaints@cityoflondon.gov.uk

Advice and assistance

- 15.5 Anyone who requires advice or assistance with their housing situation can contact the Housing Needs team to discuss their housing options:
- by email - hadvice@cityoflondon.gov.uk
 - by telephone – 020 7332 3452/1237/1654
 - in writing

The Housing Needs Team
Barbican Estate Office
3 Lauderdale Place
London
EC2Y 8EN

15.5 Anyone who is homeless or threatened with homelessness should contact the Advice and Homelessness Officer:

- by email - homeless@cityoflondon.gov.uk
- by telephone – 0207 332 1804
- in writing

The Advice and Homelessness Officer
PO Box 270
Guildhall
London
EC2P 2EJ

15.6 If you have an emergency outside normal office hours, please call 0208 552 9587.

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Aim	Para	Change	Description	Rationale	Impact
Fairness Best Use Clarity	1.3 5.2 9.1	A points system	Changing the operation of the scheme from a 'points within bands' hybrid system to a points only system.	A points system is able to take into account the complexity of each applicant's circumstances, ensuring housing goes to those most in need. A bands system can be overly simplistic, failing to distinguish between different circumstances. Our current 'points within bands' system is unclear in its operation.	High Those with multiple needs will benefit, while the position of those with lesser needs but more waiting time will worsen.
Best Use	4.2	Quick qualification for transfers	Exempting tenants who apply for a transfer from a number of qualifying criteria, about local connection, household income and savings.	Paragraph 3.24 of the Code of Guidance suggests there are sound policy reasons for applying different qualification criteria to existing tenants. We intend to exempt transferring tenants from having to prove a local connection (which may impact unfairly on those housed in the out of City estates) and from income and savings thresholds (which may penalise a household for making efforts to improve their circumstances).	Low This will make transfers easier for tenants, enabling them to find suitable accommodation and the Corporation to make best use of its housing stock.
Strong Neighbourhoods	4.3	Care to count as a local connection	New applicants need to prove a local connection to qualify for housing. We intend to count providing care to a City resident or tenant as a local connection.	Assisting carers to live near to the person they care for is a way of supporting both people and reducing the likelihood of additional support being required from statutory services. The Housing Act requires reasonable preference to be offered to those who need to move to avoid causing hardship to themselves or others. Counting care relationships as a local connection will allow us to better meet this requirement.	Low This will open the City's waiting list up to a limited number of new applicants. Care must be documented by an award of Carer's Allowance or Adult Social Care assessment.
Efficiency	4.4	A number of exemptions to the local connection requirement	The requirement for a local connection will not apply to household to whom the Corporation owes a homeless duty or households moving through Right to Move, Housing Moves or other agreements.	Exempting accepted homeless households from local connection requirements will reduce the length of time households spend in temporary accommodation, which is better for the family and less expensive for the Corporation. Exempting reciprocal schemes from local connection rules enables the Corporation's full participation in schemes designed to promote tenant employment, support caring relationships and facilitate urgent management moves.	Low These exemptions will see some homes allocated to non-local people. However, this is necessary to meet the Corporation's legal duties and to enable City residents to have occasional access to housing in other areas.

Best Use	4.2	A savings cap of £16,000	Applicants must now have less than £16,000 in savings to qualify. The threshold had previously been set at £30,000.	Those with savings of between £16,000 and £30,000 are better able to secure their own housing, either in the private rented sector or by continuing to save in order to access Low Cost Home Ownership. As such, scarce social homes should be allocated to those without access to this resource.	To be confirmed The annual Housing Register census will provide an indication of how many applicants are likely to be excluded from the waiting list.
Fairness	4.2	Armed Forces savings disregard	Any lump sum received as compensation for an injury or disability sustained on active service will not be counted for the purposes of the savings threshold.	The Government's Military Covenant recommends that local authorities disregard compensation paid to members of the Armed Forces for injury or disability sustained on active service.	Low There are very few applicants on the Corporation's waiting list with an Armed Forces background. The disregard may apply to only a very limited number of applicants.
Strong Neighbourhoods	4.5	Expanding disqualification for 'unacceptable behaviour'	Applicants only risk disqualification if their behaviour as a tenant of the council, or that of a member of their household, is unacceptable. This should be extended to cover tenants of other landlords and household guests.	Unacceptable behaviour, such as causing nuisance, annoyance or harassment to neighbours, is a problem regardless of whether or not it takes place in a City Corporation home. Disqualifying applicants associated with unacceptable behaviour in any type of housing will reduce the likelihood of such incidents being repeated on City Corporation estates, making them more pleasant places to live for all residents.	Low The number of City Corporation transfers refused for unacceptable behaviour is low, and there is no reason to believe the behaviour of other City residents and workers would differ.
Best Use	4.5	Disqualification on grounds of property ownership and tenancy status	The current scheme only disqualifies people who own a property. This should be extended to cover applicants whose partners own a property, as well	It is an inefficient use of scarce social housing to allow homeowners, or people who already have a social tenancy, to go on the waiting list.	Low Few applicants who are already suitably housed in this way apply to the City Corporation.

			as applicants and their partners who already have a social tenancy (which they do not intend to give up as part of a transfer).		
Strong Neighbourhoods	4.5	Updating definitions of domestic violence	The definition of domestic violence should be expanded from just physical violence to include psychological, sexual, financial and emotional abuse.	The definition of domestic violence used in the current scheme is behind current understandings of domestic violence, and risks leaving victims of abuse without appropriate support.	Medium An updated definition of domestic violence will allow victims to be better protected and perpetrators to be excluded from the housing list.
Best Use Page 145	4.5 7.17 7.18	Anti-Fraud measures (qualifying)	We intend to exclude applicants from the housing list for attempted, as well as successful, housing fraud.	Tenancy fraud causes significant social harm, can lead to antisocial behaviour and deprives genuine applicants of a home. We intend to exclude applicants from the waiting list for attempted, as well as successful, housing fraud, and keep those guilty of fraud off the waiting list for as long as the law allows.	Low The vast majority of applicants for housing are in genuine housing need.
Fairness Strong Neighbourhoods	6.2(b)	Offering some preference to low income City residents	The 'low income City connection' letting category is currently only open to City workers. We will widen this to also include City residents.	The current policy offers some preference to low income City workers, as the Corporation recognises that this group may struggle to afford to buy or rent housing in the open market. We propose expanding this group to include other groups who may also have difficulty affording housing: - City residents who work in low income jobs outside of the Square Mile - City residents who experience problems with their housing costs after losing a job - City residents who are not in paid employment and who experience problems with their housing costs as a result of welfare reform.	Medium The number of City residents who are on a low income and who are not either owner-occupiers or Corporation tenants is limited. However, this would give a moderately sized group a greater degree of preference for housing.
Clarity	6.3	Setting a variable threshold for	We propose setting this at the income a household with two	Currently the Corporation defines 'low income' as a household income of less than £26,000. This was based on the threshold used in the Overall Benefit Cap, which has now changed and was in any case of limited	Medium This will increase the threshold to £29,640,

		low income	full time workers earning the National Living Wage would receive.	relevance to a family in full time employment. It was also inflexible and did not take account of changing labour market conditions. Tying our definition of 'low income' to the National Living Wage will mean it is updated annually in line with decisions made by the Low Pay Commission.	making a substantial number of extra City workers entitled to some local letting preference.
Efficiency	6.6 6.7	Affordability checks for 'Sons and daughters'	Those aged 21 and under who are applying through the 'Sons and Daughters' letting route will need to pass an affordability check.	The Government have announced their intention to remove Housing Benefit / Universal Credit (Housing Element) from people aged 21 and under. This may make tenancies granted to this group unsustainable unless they are in employment or have another way to pay the rent. By requiring applicants to pass an affordability check, we can minimise the risk of tenancy breakdown. Young people applying for housing via another route (homeless, medical, etc.) are likely to qualify for an exemption from these rules and will not be required to pass a check.	Low This will prevent some sons and daughters from going on the housing register. This can be overcome when they turn 22 or when they find employment.
Clarity Fairness	6.13 9.32	Add decant moves to the allocations system	We propose adding decants to the Allocations Scheme and prioritising them into urgent, middle and early bands.	As a transfer not covered by Part VI of the Housing Act, decants are not an allocation and do not need to be included in the scheme. However, by including them, we can be more transparent with our applicants about who is getting housing and why. We will also be able to better prioritise urgent from not-urgent decant moves, preventing them from crowding out other applicants from the lettings process.	Medium Prioritising decants according to urgency will achieve a better balance between the needs of those moving due to regeneration schemes and the needs of others.
Best Use	6.16	Dealing with the end of fixed term tenancies	When a fixed term tenancy will be renewed at a smaller property, the tenant will be able to bid as an under-occupier.	The Housing and Planning Act 2016 will require the City Corporation to offer fixed term tenancies as the default option. At the end of the fixed term, if the Corporation still has a housing duty to the household but their current home is too large for their needs, they will be required to move. By adding these tenants to the under-occupation group, they will be able to find more suitable accommodation quickly.	Low This may increase the number of larger homes available for re-letting, but perhaps not for several years.
Fairness	6.17	Expanding the 'Studio Upgrade' transfer group	Tenants living in studios as couples, and parents whose children do not live with them, but who visit regularly, will also be included as studio upgrades.	Since the introduction of the 'Studio Upgrade' group, single tenants aged 45 and over without any housing needs have been able to bid for a transfer to a one-bedroom flat. In some cases they have had priority over younger tenants living in studios with an identified need for a one bed flat (overcrowded couples and parents unable to have full visiting access to their children). By expanding the 'Studio Upgrade' group, we can show fairness to these groups.	Low This change will affect a small number of transfer cases. It is also essential if the 'Studio Upgrade' group is to be given further priority (see below).

Best Use	7.3	Requiring applicants to supply a recent Council Tax bill to join the housing register	Applicants are already asked to supply a number of documents to prove they are eligible and qualifying. We will also ask for a Council Tax bill.	Asking for a Council Tax bill for an applicant's current address will help officers ascertain whether a person has a local connection to the City, and verify that the housing history they have provided is accurate. The requirement will be waived for those with no fixed address, those whose Council Tax is paid by a uncooperative landlord or those with other extenuating circumstances.	Low This is a minor administrative change designed to ensure only qualifying applicants are placed on the waiting list.
Fairness	8.4	Including dependent children in assessments of bedroom need where the applicant where the applicant is responsible for them for 50% of the time	The current scheme only includes dependent children in a calculation of bedroom size where they live with the applicant at least 51% of the time.	This change will allow agreements for separated parents to take equal responsibility for their child in take place in practice. Where the Family Court has ruled that a child should spend equal amounts of time with each parent, or where parents have reached this arrangement on their own, the City Corporation would consider providing the child with a bedroom in either / both households. This will strengthen family relationships and is fair to the children in question. It may result in some under-occupation and this aspect will be kept under review.	Low We expect this provision to be used by a limited number of separated families.
Best Use	9.9	Increasing the priority of the 'Studio Upgrade' group	Studio Upgrades will move from the middle (band 3 of 4) to a higher position (group 5 of 12).	Studio Upgrades (allowing tenants with no housing need to transfer from studios to one bedroom homes) were introduced to free up studio sized stock, which is in high demand from new lettings. The policy has not led to the number of transfers and therefore new studio lettings as hoped for. Increasing the priority of the group will lead to more movement.	Medium Studio Upgrade transfers will now have priority over most applicants seeking a one bed.
Fairness	9.19	Awarding points for 'Mixed Sibling Sharing'	Extra points will be awarded where overcrowding forces siblings of different genders aged ten or over to share a bedroom.	The psychological effects of overcrowding are worse when siblings of different genders must share a bedroom when they approach puberty. Both the Corporation's Bedroom Standard and DCLG's guidance calls for separation of siblings by gender from age 10 and over. While this is reflected in assessments of a household's bedroom requirement, this would not always result in a household with mixed sharing being prioritised over with only same sex sharing.	Medium This will affect all overcrowded households. Those with mixed sharing will move ahead, while all of those without will lose relative priority.
Best Use	9.29	Awarding points for 'Long	Extra points will be awarded to	The last revision of the Allocations Scheme reduced the priority given to homeless households, in an attempt to discourage applicants from	Medium This will place homeless

		Temporary Accommodation Stay'	homeless households who have been in temporary accommodation for at least 12 months.	applying as homeless when other options were still open to them. This reduction in priority has resulted in an increase in the average length of stay in expensive temporary accommodation. Providing extra points to homeless applicants after 12 months should meet the twin aims of keeping temporary accommodation stays to an acceptable length, while ensuring applicants only apply as homeless when all other options have been exhausted.	applicants (27 were accepted in 2015/16) in a strong position on the waiting list after 12 months.
Best Use	9.30	Awarding points for 'Advice and Engagement'	Applicants in the most need will be invited to develop a Personal Housing Plan, with extra points available for participation.	Personal Housing Plans are due to be introduced by the Homelessness Reduction Bill. They will offer everyone at risk of homelessness advice and support to resolve their housing needs. By extending this offer to those with severe housing needs (who may meet the definition of 'homeless at home') we hope to be able to help these households resolve their housing needs too.	Low This will apply to families with the most severe needs and will offer a limited amount of extra priority.
Fairness	9.31	Reducing points for 'Intentionality'	Applicants who have contributed to their own housing difficulties will have their priority reduced.	The Corporation currently treats Intentionally Homeless applicants less favourably than other homeless applicants. There are grounds for extending this policy to cover those who willingly move into unsuitable accommodation in order to gain greater priority for rehousing. This prevents such households from jumping ahead of others on the waiting list.	Medium This will significantly disadvantage the small number of households who attempt to artificially increase their priority.
Fairness	9.39.II 9.45	Giving effect to the Military Covenant with additional points	Additional priority will be given to applicants with specific Armed Forces backgrounds by offering extra points.	The Military Covenant requires local authorities to offer additional priority to applicants with certain Armed Forces backgrounds. The Corporation previously met this requirement with designated bands for Armed Forces applicants in bands 2 and 3. This offered limited additional priority, as an applicant who already qualified for Band 2 (e.g. a homeless applicant) would not gain any additional priority. By offering extra points to those with certain Armed Forces backgrounds, we can ensure they are always prioritised ahead of non-Armed Forces applicants in similar housing circumstances.	Low This will apply to very few applicants. It will advantage those injured in active service and bereaved spouses. Armed Forces applicants with no housing needs may receive less priority.
Clarity	9.40 – 9.45	A clearer system for awarding welfare priority	Welfare priority was previously awarded on a case by case basis. The new scheme offers procedures setting	A written procedure for awarding welfare priority is more transparent for applicants and will ensure consistent decision making. The scheme contains five levels of welfare priority; each with a list of circumstances which would lead to an award of priority being made. These are by no means meant to be exhaustive and where an applicant presents with a welfare issue not listed in the guidance, officers are asked to compare	Low This should not radically change the awards of welfare priority that are made. Listing the circumstances for which

APPENDIX B

			out circumstances within which priority should be awarded.	the case before them with the examples listed and decide with which group it fits most closely.	points will be awarded may increase the number of applications.
Fairness	9.45.II	Increasing the priority of child welfare cases	Increasing priority from middle (band 3 of 4) to high (3 of 12)	Where a family needs to move to carry out a caring role with a City child (adoption / fostering / special guardianship etc.) it is important that we meet this need quickly. This also puts child welfare on the same footing as adult welfare cases where a person's wellbeing and independence would be severely at risk if a move did not take place.	Low Very few applications are made on this basis.
Efficiency	9.45.II	Allowing households in insanitary housing to participate in Choice Based Lettings (CBL)	Households in insanitary accommodation will be allowed bid in CBL rather than restricted to Direct Offers only.	The Corporation's statement on choice sets out that applicants should have a choice in their accommodation, unless there is a good reason why this is not appropriate. The groups without access to CBL generally require specialist accommodation. Households in insanitary accommodation require general needs housing and there is no reason why they should not participate in CBL.	Low This is an administrative change which does not have a major impact on the level of priority offered.
Fairness Page 149	9.45.IV	Prioritising homeless applicants in priority need	Homeless applicants who are assessed as being in 'priority need' will be given priority over those who are not.	Part VI of the Housing Act requires the Corporation to offer reasonable preference to all eligible, homeless applicants, regardless of whether or not they are in priority need or whether a homeless duty under Part VII is accepted. Offering extra points to those in priority need allows us to meet this legal duty, but also ensure that vulnerable homeless applicants (for example, those with children or medical conditions) are housed first.	Low Few applicants who are refused help under Part VII go on to apply under Part VI. This will therefore have only a limited impact in practice.
Fairness	9.45.IV	Prioritising severely overcrowded households	Additional preference will be offered to the most overcrowded households.	Housing authorities must consider giving additional preference to particular descriptions of people who fall within the statutory reasonable preference categories and have urgent housing needs. One such category of people is families in severe overcrowding which poses a serious health hazard.	Low This will provide a slight advantage to a small number of households (estimated to be 1% of the register).
Strong Neighbour hoods	9.45.IV	Prioritising parents who do not live with their children, whose current home prevents regular visits	Low welfare priority will be awarded to applicants in this situation.	In some cases parents who do not live with their child but who have visitation rights have been prevented from having adequate access to their child as a consequence of living in studio accommodation. The Corporation's Bedroom Standard already offers parents in this position a one bedroom flat instead of a studio. This proposal would make it easier for existing tenants to transfer to a larger home if this is necessary to enable them to have a relationship with their child.	Low This minor change will offer a limited amount of extra priority to a limited number of applications.

Fairness	9.47 – 9.51	Implementing a 'Priority Date' system	Any time applicants have spent in a group higher than or equal to their current position will count towards their total waiting time.	Where two applicants have the same level of points, their time spent on the waiting list is used as a tie-breaker. Previously, when applicants moved between bands, their waiting time would be re-set. To ensure that applicants with changing circumstances do not lose out, we propose counting any time applicants have spent in a group higher than or equal to their current position towards their total waiting time.	Low While more complex to track and implement, this change will ensure that applicants will not be disadvantaged by a change of circumstance.
Best Use	9.52	An exception to the 'Priority Date' system for homeless applications	The acceptance of a homeless application will always reset an applicant's waiting time to that date.	The acceptance of a homeless application and provision of temporary accommodation is a fundamental change in an applicant's housing circumstances. Resetting an applicant's waiting time reflects this change and will also support efforts to ensure that a homeless application is only submitted when an applicant has exhausted all other options.	Low This will apply to a very limited number of applicants per year, who apply as homeless but who had were already been awarded reasonable preference for another reason.
Best Use	11.3. V	Care Leavers to be made Direct Offers of accommodation	Care Leavers will be made a Direct Offer of accommodation, instead of participating in Choice Based Lettings (CBL).	Rather than bid for a home, Care Leavers will meet with a member of the Housing Needs Team, along with their Social Worker, to discuss their requirements. A suitable until will be found and offered to them directly. This allows the Corporation to better meet the needs of its Care Leavers and ensure that the most suitable independent accommodation is found for them.	Low This change in policy reflects current practice and does not represent a substantive shift in approach.
Best Use	11.3. VI	Applicants with exceptional support needs to be made Direct Offers of accommodation	Applicants with exceptional support needs will be made a Direct Offer of accommodation, instead of participating in CBL.	The Housing Register is aimed at households seeking general needs social housing or low support retirement housing. If an applicant would not be able to maintain a social tenancy in an appropriate manner because of the extent of their support needs, then the applicant may be made an offer of suitable supported housing or referred to Adult Social Care for assessment. This allows the Corporation to better meet the needs of those with high support needs and ensure that the most suitable independent accommodation is found for them.	Low This clause is intended to be used sparingly, in genuinely exceptional circumstances only. Applicants will still receive priority for housing.

Best Use	11.3. VII	Applicants moving on from supported accommodation to be made Direct Offers of accommodation	Applicants moving on from supported accommodation will be made a Direct Offer of accommodation, instead of participating in CBL.	Applicants moving on from supported accommodation currently participate in Choice Based Lettings and are in Band 2 of 4. By making Direct Offers we will be able to rehouse applicants who are ready for general needs housing faster. This will free up space in supported housing, enabling new clients to move in and better use to be made of this resource.	<p>Low</p> <p>A small number of applicants will be housed faster. While their choice in accommodation is more limited, officers will still consult applicants on their preference and meet these where possible.</p>
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EQUALITY ANALYSIS (EA) TEMPLATE

Decision

Approved

Date

24/03/17

What is the Public Sector Equality Duty (PSED)?

[Double click here for more information / Hide](#)

What is an Equality Analysis (EA)?

[Double click here for more information / Hide](#)

How to demonstrate compliance

[Double click here for more information / Hide](#)

Deciding what needs to be assessed

[Double click here for more information / Hide](#)

Role of the assessor

[Double click here for more information / Hide](#)

How to carry out an Equality Analysis (EA)

[Double click here for more information / Hide](#)

The Proposal *Click and hover over the questions to find more details on what is required*

Assessor name: Adam Johnstone

Contact details: adam.johnstone@cityoflondon.gov.uk / 020 7332 3453

1. What is the Proposal?

The proposal is the approval and implementation of a new Housing Allocations Scheme. The City Corporation is required by s.166A(1) of the Housing Act 1996 to have an allocations scheme for determining the level of priority offered to each applicant for social housing and for defining the procedures to be followed in allocating accommodation. The proposed Housing Allocations Scheme 2017 will replace the 2015 scheme and is intended to provide greater clarity for applicants, to incorporate recent changes in the law and to allocate the City Corporation's housing stock in a fairer and more efficient way.

2. What are the recommendations?

The central recommendation of the 2017 Allocations Scheme is to use a points, rather than bands, based system. A points system is able to take into account the complexity of each applicant's circumstances, ensuring housing goes to those most in need. A bands system can be overly simplistic, failing to distinguish between different circumstances. Our current 'points within bands' system is unclear in its operation.

The 2017 Scheme also proposes lowering the savings threshold applicants must be beneath to qualify for housing, from £30,000 to £16,000. This would ensure social housing is focussed on those least able to meet their own housing needs in the private sector. The threshold of £16,000 has been chosen to align with the level of savings that would also disqualify an applicant from receiving Housing Benefit / Universal Credit (Housing Element).

It is proposed that the threshold at which a household can receive preference as a 'lower income City worker' is tied to the gross earnings that would be received by two people both working full time at the National Living Wage (NLW), rather than being fixed at £26,000pa. In 2017, this would see the threshold increase to £29,640 and gradual increases in this are expected in subsequent years as the Low Pay Commission increases the NLW.

The 'lower income City worker' preference category is also proposed to be renamed as 'lower income City connection' to its criteria expanded to include:

- City residents who work in low income jobs outside of the Square Mile
- City residents who experience problems with their housing costs after losing a job
- City residents who are not in paid employment and who experience problems with their housing costs as a result of welfare reform.

The 2017 scheme proposes including decant moves in the allocations process. By having one system for allocations and decants, all applicants will be able to see who is getting housing and why, increasing trust and confidence in how the City Corporation allocates accommodation.

The new scheme increases the number of groups eligible for a 'Studio Upgrade' move (a transfer from a studio and a one-bed, where there is no other housing need) and increases the priority moves of this type receive. This will be to the benefit of eligible applicants but will also make more, currently relatively scarce, studio flats available for re-letting. 48 per cent of our applicants require studio accommodation while only 31 per cent of lettings are studios. In contrast only 13 per cent of applicants require a

one bed flat, while 30 per cent of new lettings are one bed flats. The Studio Upgrade list is primarily intended to manage this mismatch between demand and supply.

The new scheme proposes awarding extra points to homeless households who have been in temporary accommodation for twelve months or longer. This is intended to reduce the length of time households spend in insecure and expensive temporary accommodation, while the lower priority offered for the first twelve months still encourages those threatened with homelessness to engage with prevention work, rather than relying on an offer of social housing.

The new scheme proposes reducing the priority offered to households who have in some way contributed to their own housing difficulties. This could include:

- Having applied for assistance under Part VII of the Housing Act 1996 and been found intentionally homeless;
- Having moved into unsuitable accommodation to attract or increase priority for re-housing. This will apply when an applicant chose to occupy unsuitable accommodation when suitable and affordable accommodation was likely to be available to them;
- Having refused one Direct Offer, or three offers under Choice Based Lettings, of suitable accommodation from City Corporation.

The 2017 scheme proposes offering additional priority to households where overcrowding has forced siblings of different genders, where one or both is aged ten or over, to share a bedroom. This is because the psychological effects of overcrowding are worse when siblings of opposite genders must share a bedroom as they enter puberty.

The new scheme makes a number of other minor and lower impact changes to offer additional clarity, to incorporate changes in the law which have occurred since 2015 and to refine the operation of housing allocations to make best use of the City Corporation's finite housing stock. These are discussed below as they are relevant to a protected characteristic.

Who is affected by the Proposal? *Identify the main groups most likely to be directly or indirectly affected by the recommendations.*

The groups affected by the proposal will be:

- Current tenants who are on the transfer list and current applicants on the waiting list
- City Corporation tenants, City residents, City workers and others who may wish to join the Housing Register in the future

Age [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics:

The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area. Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Age

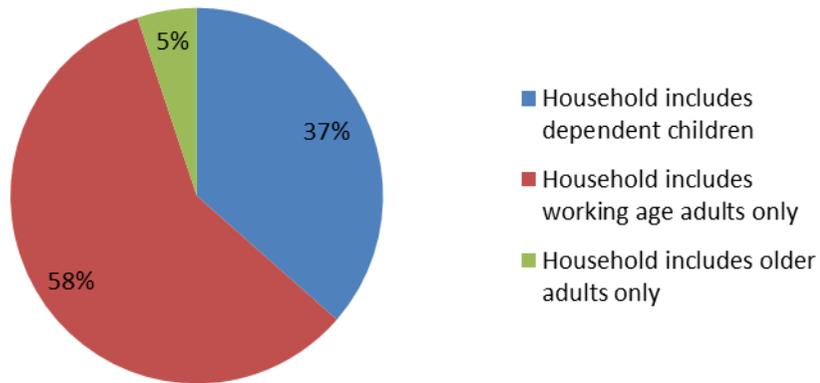
Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The above borough statistics are of limited use when discussing housing allocations. Of the City's twelve housing estates (the source of all transfer applications), ten are located outside of the Square Mile. Most new applicants on the waiting list qualify by virtue of working in the City, but they generally live elsewhere.

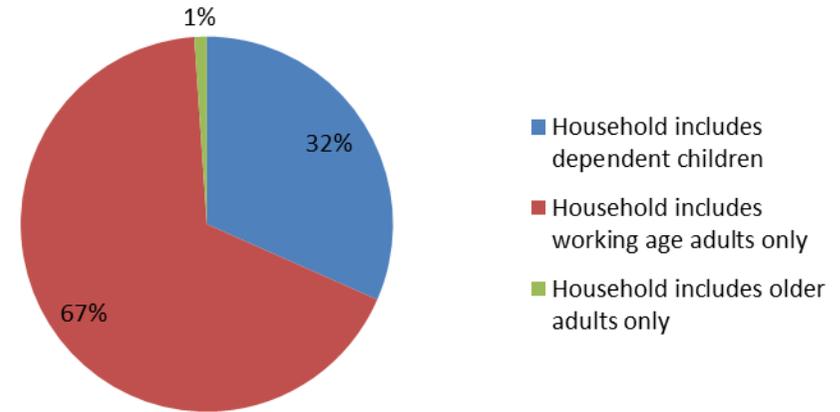
Age

Analysis of the Housing Register provides a better guide to the age breakdown of those most affected by the proposals. The Housing Register can be divided into the waiting list of new applicants and the transfer list of current tenants in need of different accommodation. Also provided is a snapshot of 2016/17 homeless acceptances to date, which forms a small but distinct part of the waiting list of new applicants.

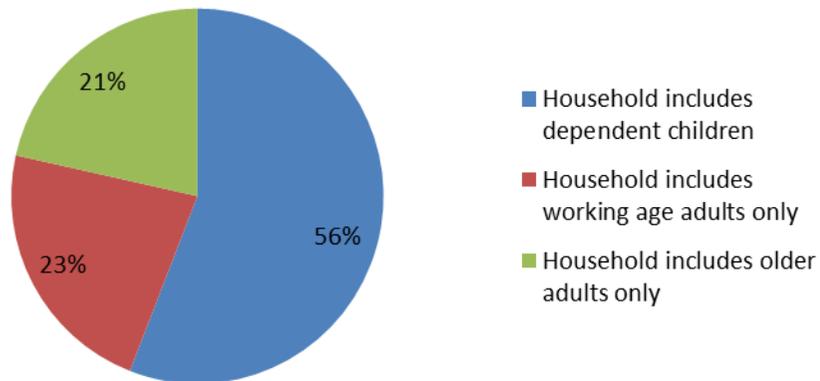
Housing Register by Age



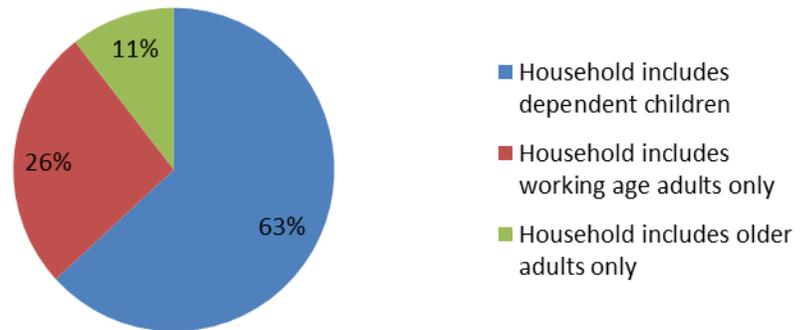
Waiting List by Age



Transfer List by Age



Accepted Homeless Households by Age Profile



Age

Overall the majority of the City Corporation's Housing Register is made up of households containing working age adults only, a sizeable minority of households contain a dependent child, while only 5 per cent are made up of older people. This is heavily influenced by the waiting list of new applicants, most of whom have qualified as lower income City workers.

In contrast the majority of the transfer list is made up of households with dependent children. There is also a sizeable minority of older people. This results in different housing needs; 68% of the transfer list are overcrowded, while only 44% of the waiting list are. On the transfer list, 12% are under occupying their current accommodation, while only 4% of the waiting list are doing the same. Typically overcrowding will affect households with children or younger adults living in overcrowded family homes. Under-occupation is more often an issue for older applicants who are living in homes that are too large now their children have left home.

New applicants on the homeless list are even more likely to include dependent children, primarily as a result of the priority need test for gaining a homelessness duty. The homeless list also includes more older people than the waiting list and Housing Register, of which it is a constituent part.

What is the proposal's impact on the equalities aims? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

1) The central recommendation of the 2017 Allocations Scheme is to use a points, rather than bands, based system. A points system is able to take into account the complexity of each applicant's circumstances, ensuring housing goes to those most in need.

2) The scheme proposes exempting transferring tenants from a number of qualifying criteria, about local connection, household income and savings. This will mean that qualification criteria aimed at new applicants do not unnecessarily obstruct attempts to assist overcrowded households including children or under-occupying older tenants.

3) The scheme proposes exempting homeless households from further local connection requirements (in addition to those already included in the Part VII homeless process). This will enable homeless families, more likely to include dependent children to be housed faster.

4) Increasing the threshold at which a household can receive preference as a 'lower income City worker' will enable more people to join the waiting list. This is expected mainly to benefit working age adults without children.

5) The scheme proposes requiring those who are aged 21 and under and who are applying through the 'Sons and Daughters' letting route to pass an affordability check. This is in response to Government proposals to remove Housing Benefit / Universal Credit (Housing Element) from people aged 21 and under.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

1) Mostly positive impact. A more needs focused system will benefit dependent children affected by overcrowding, as well as older people with medical needs. There will be a corresponding loss of priority for those with fewer needs and this may be concentrated amongst working age applicants without children. However working age applicants who also have complex housing needs will benefit.

2) Positive impact.

3) Positive impact.

4) Positive impact.

5) This will prevent some 18 – 21 year olds from going on the Housing Register. However, the City Corporation needs to ensure that all new tenancies are likely to be sustainable. The impact is mitigated by requiring an affordability check, which can be met in a number of ways, rather than a blanket increase to the age threshold for the non-statutory 'Sons and Daughters' letting route. 18 – 21 year olds applying through other letting routes (e.g. medical, homeless) are likely to qualify for an

Age

6) The scheme proposes increasing the priority given to the 'Studio Upgrade' letting route, which will move up from position 3 of 4 in the current scheme to position 5 of 12 in the new one. 'Studio Upgrade' enables City Corporation tenants living in a studio flat with no housing needs to apply for a transfer to a one bedroom flat. Currently, it is open to tenants aged 45 and over only. Studio occupiers with an identified housing need for a one bed can be prioritised in another category, regardless of age.

7) The new scheme proposes offering additional priority to households where overcrowding has forced siblings of different genders, where one or both is aged ten or over, to share a bedroom. This is because the psychological effects of overcrowding are worse when siblings of opposite genders must share a bedroom as they enter puberty.

8) The new scheme proposes awarding extra points to homeless households, 63% of which contain a dependent child, who have been in temporary accommodation for twelve months or longer.

9) The new scheme proposes increasing the priority of child welfare cases from group 2 of 4 to group 3 of 12, providing parity with serious adult welfare cases.

10) The new scheme proposes prioritising homeless applicants in priority need (including all those with children or a vulnerable older person) over those who are not.

11) The new scheme proposes providing additional priority to the most severely overcrowded households. Of those likely to be awarded this priority (lacking three bedrooms or more), 100% contain dependent children.

12) The proposed 'priority date' system includes a provision that a homeless acceptance will always reset this date, lengthening waiting times. The makeup of the homeless list means this will have a disproportionate effect on dependent children.

13) The proposed scheme would make a Direct Offer of suitable accommodation to every care leaver on the waiting list, instead of having them bid through Choice Based Lettings (CBL), reducing waiting times.

14) The scheme sets out a threshold stating how much time a dependent child must spend in a household before they will be considered part of that household for the purposes of deciding a property size entitlement. The new scheme proposes lowering this threshold from 51% of the time, to 50% of the time. This change will enable separated couples to share parental responsibility, should they wish to.

exemption to the Housing Benefit restrictions and an affordability check will not be required.

6) Further increasing the priority of this category will have a mixed impact on age, as in the current scheme tenants must be aged 45 or over to qualify. Further prioritising the category will adversely impact younger tenants. This is mitigated by expanding the Studio Upgrade category to include younger couples as well as single tenants whose children do not live with them, but who visit regularly. Younger people who live in a studio but require a one bed for a medical or welfare reason will continue to be awarded priority in the medical / welfare group.

7) Positive impact.

8) Positive impact.

9) Positive impact.

10) Positive impact.

11) Positive impact.

12) Negative impact – but a proportionate one to the City Corporation's need to manage the use of temporary accommodation. The effect is mitigated by greatly increasing the priority of homeless households after twelve months.

13) Positive impact. This system does remove choice from applicants but this is mitigated by meeting with the applicant and their social worker to discuss their preferences for accommodation prior to an offer being made. It also enables those who don't understand or engage with CBL to gain housing too.

14) Positive impact – this is fairer to children of separated parents and will help them to enjoy a relationship with both parents. There is a risk that allocating two bedrooms in different properties to one child will lead to under-occupancy and exacerbate overcrowding for other children. The impact and sustainability of this policy will be monitored.

Key borough statistics:

Day-to-day activities can be limited by disability or long term illness - In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Extract from summary of the [2011 Census relating to resident population health for the City of London can be found on our website.](#)

The 2011 Census identified that for the City of London’s population:

- 4.4% (328) had a disability that limited their day-to-day activities a lot
- 7.1% (520) had a disability that limited their day-to-day activities a little.

Source: 2011 Census: [Long-term health problem or disability, local authorities in England and Wales](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Disability

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

Information about people with disabilities on the Housing Register is not reported on. Relatively few people qualify for medical / welfare priority and those that do are housed relatively quickly, due to the high degree of priority already offered.

Of those households accepted as statutorily homeless in 2016-17 to date 11% were found to be vulnerable (and therefore in priority need) due to a physical illness or disability and 11% were found to be vulnerable (and therefore in priority need) due to a mental illness or disability. Applicants on the homeless list are therefore more likely to have disability as a protected characteristic than the general City of London population.

What is the proposal’s impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

- 1) The central recommendation of the 2017 Allocations Scheme is to use a points, rather than bands, based system. A points system is able to take into account the complexity of each applicant’s circumstances, ensuring housing goes to those most in need.
- 2) The scheme proposes exempting transferring tenants from a number of qualifying criteria, about local connection, household income and savings. This will mean that qualification criteria aimed at new applicants do not unnecessarily obstruct those who need to transfer for a medical or welfare related reason.
- 3) The new scheme includes caring for a City of London resident or City Corporation tenant as a local connection for the purposes of qualifying.
- 4) The scheme proposes exempting homeless households from further local connection requirements (in addition to those already included in the Part VII

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

- 1) Positive impact. A more needs focused system will benefit people with disabilities who are more likely to have medical or welfare (care) needs.
- 2) Positive impact.
- 3) Positive impact – on carers and by association the people they care for.
- 4) Positive impact.

Disability

homeless process). This will enable homeless households, more likely to include someone with a disability, to be housed faster.

5) The new scheme proposes discounting any compensation received by a former member of the Armed Forces for a disability or injury sustained on active service for the purposes of calculating savings for qualifying.

6) The new scheme proposes awarding extra points to homeless households, 22% of which contain a person with a disability, who have been in temporary accommodation for twelve months or longer.

7) The proposed 'priority date' system includes a provision that a homeless acceptance will always reset this date, lengthening waiting times. The makeup of the homeless list means this will have a disproportionate effect on people with disabilities.

8) The new scheme proposes prioritising homeless applicants in priority need (including all applications with a person vulnerable due to a physical or mental illness or disability) over those who are not.

9) The new scheme proposes inviting those with the most serious overcrowding, medical and welfare cases to develop Personal Housing Plans to explore other housing options. Those who engage with this advice, but are still unable to resolve their housing needs will be awarded additional priority.

10) The scheme proposes giving greater effect to the Community Covenant, by increasing the priority of former member of the Armed Forces who have sustained a disability or injury sustained on active service.

11) The new scheme proposes a written, guidance-based rather than discretionary, system for determining welfare priority, increasing the clarity and consistency of decision making.

12) The proposed scheme would make a Direct Offer of suitable supported accommodation to waiting list applicants with exceptional support needs, who would be unable to appropriately sustain a general needs tenancy.

13) The proposed scheme would make a Direct Offer of suitable general needs accommodation to applicants ready to move on from supported housing, instead of having them bid through Choice Based Lettings (CBL), reducing waiting times.

5) Positive impact.

6) Positive impact.

7) Negative impact – but a proportionate one to the City Corporation's need to manage the use of temporary accommodation. The effect is mitigated by greatly increasing the priority of homeless households after twelve months.

8) Positive impact.

9) Positive impact. This will benefit those with the most serious medical and welfare issues (who are more likely to have a disability). The proposal does risk disadvantaging those with learning difficulties or mental illness, who may be less able to engage with a Personal Housing Plan. Steps to mitigate this will be implemented as the City Corporation's general approach to PHPs (a product of the Homelessness Reduction Bill) is developed.

10) Positive impact.

11) Positive impact.

12) Mixed impact. This system does remove choice from applicants but this is mitigated by meeting with the applicant and their social worker to discuss their preferences for accommodation prior to an offer being made. It enables those who don't understand or engage with CBL to gain housing too. It is also mitigated by awarding similar, Direct Offer, priority to those ready to move on from supported housing.

13) Positive impact.

Key borough statistics:

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

- [Conception and Fertility Rates](#)
- [Live Births and Still Births](#)
- [Maternities](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Pregnancy and Maternity

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals.*

Information about pregnant women and mothers on maternity leave on the Housing Register is not reported on. However, the number of households with dependent children on the Housing Register (37%) shows that for a minority of applicants, pregnancy will be relevant at a point during their application.

Of those households accepted as statutorily homeless in 2016-17 to date, 5% were found to be vulnerable (and therefore in priority need) due to a pregnancy. This does not mean to say that other applicants were not also pregnant but were first found to be in priority need for another reason (e.g. dependent children). Applicants on the homeless list are therefore more likely to have pregnancy / maternity as a protected characteristic than the general City of London population.

What is the proposal’s impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

- 1) The scheme proposes exempting homeless households from further local connection requirements (in addition to those already included in the Part VII homeless process). This will enable homeless households, more likely to include a pregnant woman or mother on maternity leave, to be housed faster.
- 2) The new scheme proposes awarding extra points to homeless households, at least 5% of which contain a pregnant woman or mother on maternity leave, who have been in temporary accommodation for twelve months or longer.
- 3) The proposed ‘priority date’ system includes a provision that a homeless acceptance will always reset this date, lengthening waiting times. The makeup of the homeless list means this will have a disproportionate effect on pregnant women and mothers on maternity leave.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

- 1) Positive impact.
- 2) Positive impact.
- 3) Negative impact – but a proportionate one to the City Corporation’s need to manage the use of temporary accommodation. The effect is mitigated by greatly increasing the priority of homeless households after twelve months.

Key Borough Statistics:

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally.

White British residents comprise 57.5% of the total population, followed by White – Other at 19%.

The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest percentage in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%.

[See ONS Census information](#) or [Greater London Authority projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below

[Double click here to show borough wide statistics / hide statistics](#)

Race

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The above borough statistics are of limited use when discussing housing allocations. Of the City's twelve housing estates (the source of all transfer applications), ten are located outside of the Square Mile. Most new applicants on the waiting list qualify by virtue of working in the City, but they generally live elsewhere.

Analysis of the Housing Register provides a better guide to the ethnic breakdown of those most affected by these proposals. The Housing Register can be divided into the waiting list of new applicants and the transfer list of current tenants in need of different accommodation. Also provided (on page 12) is a snapshot of 2016/17 homeless acceptances to date, which forms a small but distinct part of the waiting list of new applicants.

Just under half (48%) of the Housing Register is White, while 42% belong to another ethnic group. The ethnicity of 10% of the Register is not known. Differences emerge between the waiting list of new applicants and the transfer list of established City Corporation tenants. The transfer list contains more White British and Irish (by 13%), more Asian (by 6%) more Black (by 4%) and more Mixed (by 4%) applicants as a result of historical lettings patterns. The waiting list contains more South American (by 15%) and more Other White, generally EU citizens, (by 6%) applicants, as a result of more recent trends in international migration and City employment.

The ethnicity of accepted homeless applicants is recorded differently and is not directly comparable. However even if a working assumption is made to categorise all White British and Irish (25%), White Other (21%) and Central and South American applicants (16%) on the waiting list simply as 'White', the homeless list still contains considerably more White people (74%) than the waiting list (total 62%) of which it forms a constituent part.

Nationally, Black and Minority Ethnic households are more likely than white households to be living in overcrowded conditions – and this is particularly the case for Bangladeshi and Black African households. (*Adrian Jones, Black and minority ethnic communities' experience of overcrowding, August 2010*). Analysis of the City Corporation's waiting list also shows ethnic disparities in the prevalence of overcrowding:

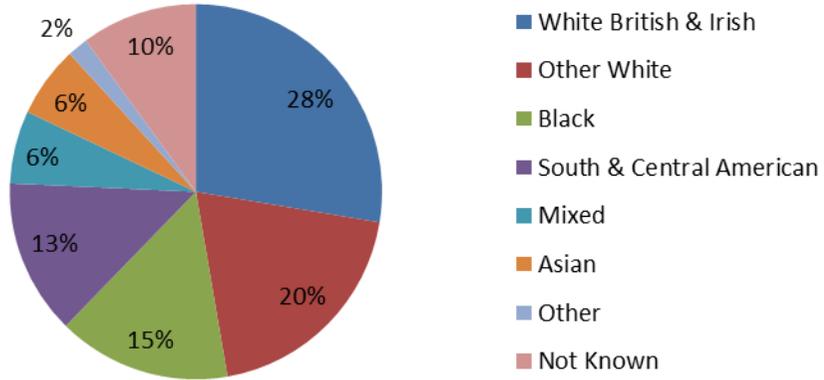
Race

Ethnicity	Percentage of Housing Register overcrowded by at least one bedroom	Percentage of Housing Register overcrowded by at least two bedrooms	Percentage of Housing Register lacking 3 or more bedrooms
Asian	63%	12%	2%
Black	57%	7%	3%
Mixed	57%	11%	0%
South and Central American	51%	7%	0%
Housing Register Average	49%	6%	1%
Other	47%	13%	6%
Not Known	47%	6%	1%
Other White	47%	6%	1%
White British	43%	4%	1%

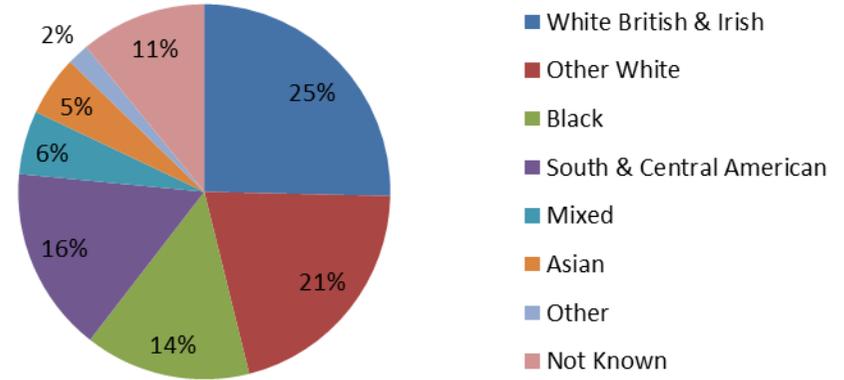
This shows that the picture of overcrowding on the City Corporation's waiting list is in line with national data. Asian, Black and Mixed households are considerably more overcrowded than the average, while White households are considerably less overcrowded.

Incidences of severe and very severe overcrowding are much rarer, but the ethnic trends persist. The exception to this is the 'Other' ethnic group, which while affected by an average amount of moderate overcrowding, is the most likely to lack 2 or 3 or more bedrooms. While worthy of note this statistic should be treated with caution due to the very low number of households in the 'Other' group (2 families lacking 2 rooms and 1 lacking 3).

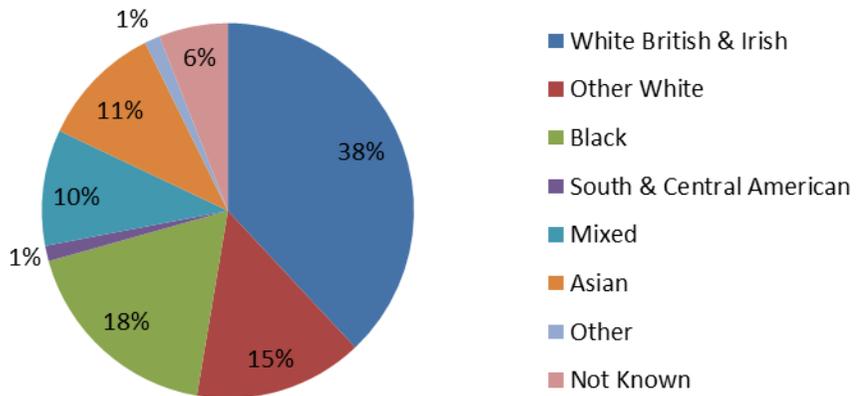
Housing Register by Ethnicity



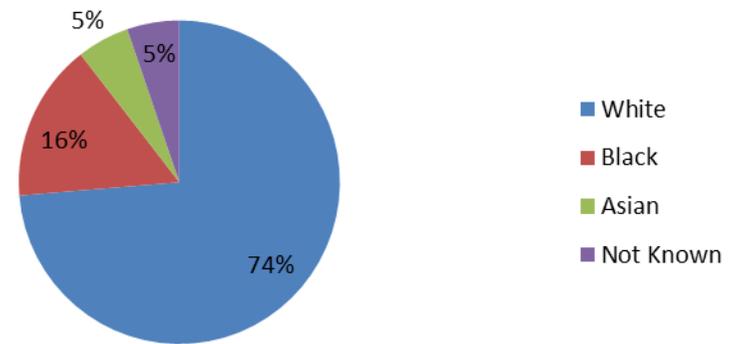
Waiting List by Ethnicity



Transfer List by Ethnicity



Accepted Homeless Applicants by Ethnicity



Race

What is the proposal's impact on the equalities aims? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

1) The central recommendation of the 2017 Allocations Scheme is to use a points, rather than bands, based system. A points system is able to take into account the complexity of each applicant's circumstances, ensuring housing goes to those most in need.

2) The scheme proposes exempting transferring tenants from a number of qualifying criteria, about local connection, household income and savings. This will mean that qualification criteria aimed at new applicants do not unnecessarily obstruct attempts to assist overcrowded households.

3) The scheme proposes exempting homeless households from further local connection requirements (in addition to those already included in the Part VII homeless process). This will enable homeless families, more likely to be White, to be housed faster.

4) The new scheme proposes awarding extra points to homeless households, 74% of which are White, who have been in temporary accommodation for twelve months or longer.

5) The proposed 'priority date' system includes a provision that a homeless acceptance will always reset this date, lengthening waiting times. The makeup of the homeless list means this will have a disproportionate effect on White applicants.

6) The new scheme proposes offering additional priority to households where overcrowding has forced siblings of different genders, where one or both is aged ten or over, to share a bedroom. This is because the psychological effects of overcrowding are worse when siblings of opposite genders must share a bedroom as they enter puberty.

7) The new scheme proposes inviting those with the most serious overcrowding, medical and welfare cases to develop Personal Housing Plans to explore other housing options. Those who engage with this advice, but are still unable to resolve their housing needs will be awarded additional priority.

8) The proposed scheme would make a Direct Offer of suitable accommodation to every care leaver on the waiting list, instead of having them bid through Choice Based Lettings (CBL), reducing waiting times.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

1) Mostly positive impact. A more needs focused system will benefit BAME households affected by overcrowding. There will be a corresponding loss of priority for those with fewer needs and this may be concentrated amongst White households. However White applicants who also have complex housing needs will benefit.

2) Positive impact.

3) Positive impact.

4) Positive impact.

5) Negative impact – but a proportionate one to the City Corporation's need to manage the use of temporary accommodation. The effect is mitigated by greatly increasing the priority of homeless households after twelve months.

6) Positive impact on overcrowded (and more likely to be BAME) households.

7) Positive impact. This will benefit the most overcrowded (and more likely to be BAME) households. The proposal does risk disadvantaging those with limited English, who will be less able to engage with a Personal Housing Plan. Steps to mitigate this will be implemented as the City Corporation's general approach to PHPs (a product of the Homelessness Reduction Bill) is developed.

8) Positive impact (as most of the City Corporation's Looked After Children are Unaccompanied Asylum Seeking Children). This system does remove choice from applicants but this is mitigated by meeting with the applicant and their social worker to discuss their preferences for accommodation prior to an offer being made. It also

Race

9) The new scheme proposes providing additional priority to the most severely overcrowded households. Of those likely to be awarded this priority (lacking three bedrooms or more), 79% are from a non White ethnic group.

enables those who don't understand or engage with CBL to gain housing too.
9) Positive impact.

Religion or Belief [Double click here to add impact / Hide](#)

Check box if NOT applicable

Religion and belief are not thought to have relevance for housing needs and allocations independently of race.

Sex [Double click here to add impact / Hide](#)

Check box if NOT applicable

Key borough statistics:

At the time of the [2011 Census the usual resident population of the City of London](#) could be broken up into:

- 4,091 males (55.5%)
- 3,284 females (44.5%)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

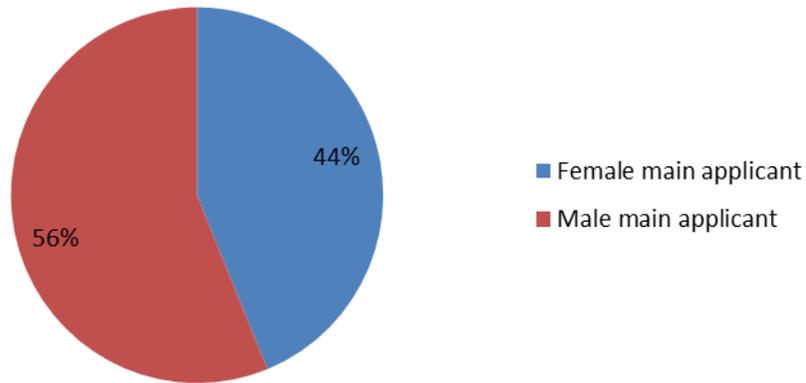
The above borough statistics are of limited use when discussing housing allocations. Of the City's twelve housing estates (the source of all transfer applications), ten are located outside of the Square Mile. Most new applicants on the waiting list qualify by virtue of working in the City, but they generally live elsewhere.

Analysis of the Housing Register provides a better guide to the gender of those most affected by these proposals. The Housing Register can be divided into the waiting list of new applicants and the transfer list of current tenants in need of different accommodation. Also provided (on page 15) is a snapshot of 2016/17 homeless acceptances to date, which forms a small but distinct part of the waiting list of new applicants.

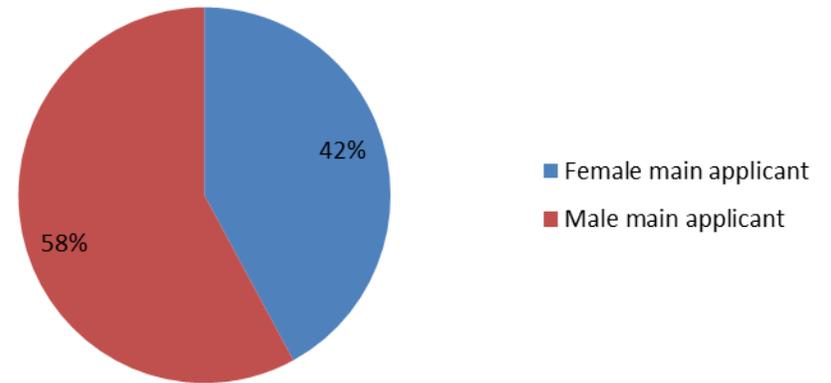
Well over half of applications on the Housing Register and the waiting list are made by a male applicant (who may or may not have a partner). The transfer list is evenly split, and around a quarter of transfer applications are in a male tenant's name. In contrast, well over half of homeless applications are made by a female applicant.

In other respects, applications submitted by male and female applicants are similar. 50% of male applicants are overcrowded, while 48% of female applicants are. 6% of male applicants are under-occupying, while 5% of female applicants are.

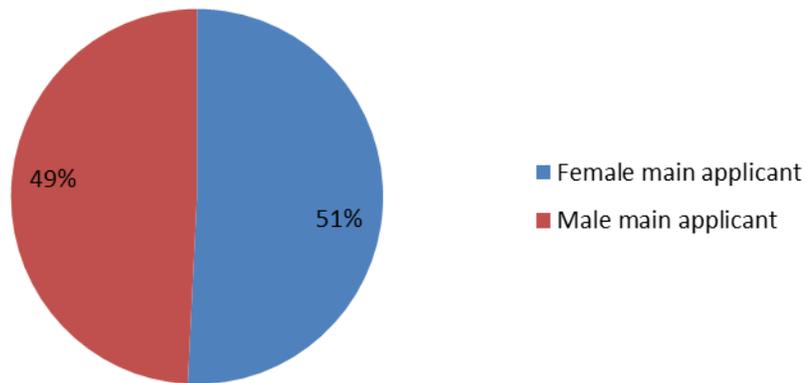
Housing Register by Gender



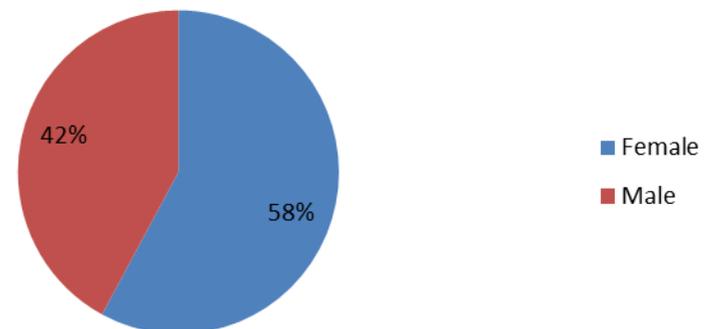
Waiting List by Gender



Transfer List by Gender



Accepted Homeless Applicants by Gender of Main Applicant



Sex

What is the proposal's impact on the equalities aims? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

- 1) The scheme proposes exempting homeless households from further local connection requirements (in addition to those already included in the Part VII homeless process). This will enable homeless families, more likely to be female, to be housed faster.
- 2) The new scheme proposes awarding extra points to homeless households, 58% of which are headed by a woman, who have been in temporary accommodation for twelve months or longer.
- 3) The proposed 'priority date' system includes a provision that a homeless acceptance will always reset this date, lengthening waiting times. The makeup of the homeless list means this will have a disproportionate effect on women.
- 4) The new scheme proposes offering additional priority to households where overcrowding has forced siblings of different genders, where one or both is aged ten or over, to share a bedroom. This is because the psychological effects of overcrowding are worse when siblings of opposite genders must share a bedroom as they enter puberty.
- 5) The new scheme expands the definition of domestic violence from physical violence to also include psychological, sexual, financial and emotional abuse.
- 6) The scheme proposes increasing the priority given to the 'Studio Upgrade' letting route, which will move up from position 3 of 4 in the current scheme to position 5 of 12 in the new one and expanding the category to include younger couples as well as parents whose children do not live with them, but visit regularly.
- 7) The scheme sets out a threshold stating how much time a dependent child must spend in a household before they will be considered part of that household for the purposes of deciding a property size entitlement. The new scheme proposes lowering this threshold from 51% of the time, to 50% of the time. This change will enable separated couples to share parental responsibility, should they wish to.
- 8) The scheme proposes raising the threshold City workers must earn beneath to receive preference in the 'lower income City connection' category from £26,000 to £29,640. This will enable a number of applicants to move up from the 'low priority' group to a group from which they could realistically hope to receive an offer of accommodation.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

- 1) Positive impact.
- 2) Positive impact.
- 3) Negative impact – but a proportionate one to the City Corporation's need to manage the use of temporary accommodation. The effect is mitigated by greatly increasing the priority of homeless households after twelve months.
- 4) Positive impact.
- 5) Positive impact.
- 6) Positive impact – as the non-resident parents afforded increased priority here are at least 95% male (*Statutory Child Maintenance Caseload, Department for Work and Pensions, 2010*).
- 7) Positive impact – as per the answer to point 6, we believe the parents most likely to lose out on contact with their children under the 51% rule, are male.
- 8) Positive impact. The '*Annual Survey of Hours and Earnings 2016 - Workplace Analysis*' shows that pay is substantially lower for women working in the City. The median annual gross pay of the second lowest tenth of men working in the City is £35,433. The median annual gross pay of the second lowest tenth of women working in the City is £24,420. Therefore, while many people could be advantaged by this change, the majority of them will be women, who are underrepresented on our waiting list.

Key borough statistics – suggested sources include:

- [Sexual Identity in the UK – ONS 2014](#)
- [Measuring Sexual Identity – ONS](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Sexual Orientation and Gender Reassignment

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

Information the Sexual Orientation and Gender Reassignment of people on the Housing Register is not reported on.

What is the proposal’s impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

- 1) The proposed allocations scheme makes no distinction between applicants based on sexual orientation or between homosexual and heterosexual relationships.
- 2) The allocations scheme sets out the City Corporation’s bedroom standard, which guides how many bedrooms each household is entitled to based on the ages and genders of household members and the relationships between them. Language has been changed from ‘same sex / opposite sex’ to ‘same gender / different gender’ to be more inclusive of trans people to enable the Bedroom Standard to have the flexibility to adequately meet their needs.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

- 1) No impact (this does not represent a change in policy).
- 2) Positive impact.

Key borough statistics - sources include:

- [The 2011 Census contain data broken up by local authority on marital and civil partnership status](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Marriage and Civil Partnership

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

Information the Marriage and Civil Partnership status of people on the Housing Register is not reported on.

What is the proposal’s impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

1) The proposed allocations scheme makes no distinction between applicants who are married and those who are in a civil partnership.

Where special provision is made for applicants who are married or in a civil partnership, the same provision will be made to applicants who have been living together as if in marriage or civil partnership for at least one year.

3) The ‘Studio Upgrade’ letting category has been expanded to include married couples, civil partners and couples who have been living together for at least a year and who are overcrowded in studio accommodation.

4) The scheme proposes giving greater effect to the Community Covenant, by increasing the priority offered to bereaved spouses whose partners have died during Active Service with the Armed Forces and who now have to leave forces accommodation.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

1) No impact (this does not represent a change in policy).

2) Positive impact. This treats those who are married or civil partnered as closely as possible with those who are not, while still ensuring that housing is not allocated on the basis of a relationship that may not last in the medium term and therefore result in under-occupancy, or that has been entered into for the purposes of fraudulently securing an offer of larger accommodation.

3) Positive impact.

4) Positive impact.

Additional Impacts on Advancing Equality & Fostering Good Relations [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims. In addition to the sources of information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service

- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

[Double click here to show borough wide statistics / hide statistics](#)

Additional Impacts on Advancing Equality & Fostering Good Relations

Additional Equalities Data (Service level or Corporate)

Type response here

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

The central recommendation of the 2017 Allocations Scheme is to use a points, rather than bands, based system. A points system is able to take into account the complexity of each applicant’s circumstances, ensuring housing goes to those most in need.

The new scheme proposes applying the ‘unacceptable behaviour’ disqualification criteria across the board, reducing the priority of those who have contributed to their own housing difficulties and introducing a range of anti-fraud measures.

3) The new scheme proposes expanding the ‘lower income City worker’ preference category to include lower income City residents.

4) The new scheme proposes including decant moves in the allocations process.

5) The new scheme proposes a written, guidance-based rather than discretionary, system for determining welfare priority, increasing the clarity and consistency of decision making.

6) The new scheme implements a priority date system. This allows applicants to keep their waiting time if they move to lower priority group.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

1) Positive impact. The proposed system offers greater clarity for applicants and greater priority to applicants with the greatest need. A demonstrably fair system will foster good relations between those who are likely to be allocated housing and those who are not.

2) Positive impact. Prioritising those who are good neighbours and do not try to unfairly increase their own priority will foster good community relations generally.

3) Positive impact. It is fair to include alongside City workers those residents who work in a neighbouring borough, those who have lost their job and those who are prevented from working because of age, disability or caring responsibilities.

4) Positive impact. By having one system for allocations and decants, all applicants will be able to see who is getting housing and why, increasing trust and confidence in how the City Corporation allocates accommodation.

5) Positive impact. Applicants will be able to see who is getting housing and why, increasing trust and confidence in how the City Corporation allocates accommodation.

6) Positive impact. Allowing applicants to keep their waiting time softens the impact of a loss of priority and lessens the sense that those with higher needs are ‘jumping the queue’.

Conclusion and Reporting Guidance

Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.

If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.

If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.

Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.

Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.

This analysis has concluded that...

The proposed Allocations Scheme 2017 would have a number of positive impacts on applicants who share a protected characteristic. By being clearer and fairer than the scheme currently in operation, it will also foster good relations between those who share a protected characteristic and those who do not.

A number of adverse impacts have been identified, however, these are all necessary to achieve wider objectives and appropriate mitigations have been put in place.

1) Increasing the priority of the studio upgrade group could have an adverse impact on tenants under 45 living in a studio. This is necessary because the studio upgrade group does not currently have sufficient priority to achieve re-housing, and is not freeing up enough much needed studio accommodation. The impact on under 45s is mitigated by expanding the category to include couples under 45 and non-resident parents whose children regularly visit overnight. People of any age who require a one bedroom flat for a medical or welfare reason are already in a higher group and this will not change.

2) Resetting the waiting time upon acceptance of a homeless application could have an adverse impact on children, women, pregnant women, people with a disability and White people, who are all overrepresented on the homeless list. This is necessary to manage the supply of temporary accommodation. The impact is mitigated by greatly increasing the priority of homeless applicants after twelve months in temporary accommodation.

3) Adopting a points, rather than bands, system could have an adverse impact on any applicant whose housing needs are less severe. Analysis of overcrowding figures suggests this may include White British and Irish people and people of working age without children. This is necessary to operate a fair system and ensure those with the greatest needs are offered the greatest priority. This is mitigated as, should White British and Irish people and people of working age without children also have severe or complex housing needs, they would also receive greater priority.

4) Requiring 'Sons and daughters' aged between 18-21 to pass an affordability check could have adverse impacts on people in this age group. This is necessary due to changes in national welfare legislation and to prevent the creation of unsustainable tenancies that are likely to end in eviction due to rent arrears. This is mitigated as an affordability check is being implemented, rather than a blanket change in the 'Sons and daughters' criteria. People aged 18-21 who are applying for reasonable preference under the Housing Act 1996, or with a lower income City connection, will also not be affected by this rule.

5) Removing applicants with exceptional support needs from Choice Based Lettings could have an adverse impact on people with disabilities. This is necessary to prevent the creation of unsustainable tenancies that are likely to fail or end in eviction. This is mitigated by meeting with the applicant and their social worker to discuss their preferences for accommodation prior to an offer being made. It also enables those who don't understand or engage with CBL to gain housing too. It is further mitigated by awarding similar, Direct Offer, priority to those ready to move on from supported housing.

6) Use of Personal Housing Plans for applicants with severe housing needs could adversely impact on those less able to understand and implement the advice they are offered, either due to a lack of English, learning disabilities or mental health issues. This is necessary to ensure no opportunity is missed to resolve an applicant's housing

This analysis has concluded that...

needs. Further work will be done to develop a protocol on Personal Housing Plans to ensure they are tailored to individual needs and capabilities.

This analysis has not yet assessed the proposal to lower the savings threshold an applicant must be under in order to qualify for housing due to a lack of available data. This threshold would reduce from £30,000 to £16,000, which could have wide reaching implications. The Housing Register Annual Census includes a question on current savings which should provide a clear indication of how many people are likely to be affected and whether applicants who share a protected characteristic are likely to be adversely affected. This analysis will be updated which an assessment of the savings proposal before the policy is approved.

Running through the new allocations scheme is an understanding that the rules cannot hope to anticipate every circumstance applicants may face. A general power of discretion is given to the Assistant Director for Housing and Neighbourhoods to address exceptional cases. This may involve granting additional priority, approving direct offers of re-housing or exempting applicants from one or more of the rules set out elsewhere in the scheme. This provision is designed to take account of all factors relevant to housing and social needs, including those related to protected characteristics.

Outcome of analysis - *check the one that applies*

Outcome 1

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

Outcome 2

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should in line with the duty have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director:	N.Hounsell	Name:	Neal Hounsell	Date:	24/03/17
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Committees:	Dates:	
Housing Management & Almshouses Sub Committee Projects Sub	16 May 2017 10 May 2017	
Subject: Decent Homes works to properties previously omitted from programmes (Call-backs 2017-2020)	Gateway 3/4 Options Appraisal(Regular)	Public
Report of: Director of Community & Children's Services Report Author: David Downing	For Decision	

Summary

Project status	Green
Project risk	Green - Low
Timeline	Procurement – to July 2017 Gateway 5 / Authority to Commence Works – July 2017 Contractor Appointed – August 2017 Works Start – September 2017
Programme status	Pending Approval of Gateway 3/4 – Options Appraisal
Latest estimated cost of works	£500,000
Expenditure to date	Staff Costs £1,000
Total estimated project cost	£575,000

Progress to Date (including resources expended and any changes since previous Gateway)

Programmes of work to bring the majority of properties of the City of London's housing stock up to the Decent Homes standard have now been carried out or are in process, however with each programme a number of properties are necessarily omitted (as they may meet the standard at the time or the works may be refused by the tenant in occupation). Over time, as previously acceptable components fail or when properties where works were refused fall vacant, the City is required to carry out works to bring these properties back to the Decent Homes standard between large scale programmes of work. This is known as a 'call-back'. A desktop exercise has now been completed and has confirmed that call-backs are typically required for up to 15 properties per year at an average cost of £11,000 per property (although range of spend per property will likely vary considerably depending on extent of works required). A budget cap of £500,000 has

been identified as sufficient to cover Decent Homes call-backs for a three year period.

Period	Properties	Estimated Cost
Year 1	15	£165,000
Year 2	15	£165,000
Year 3	15	£165,000
Total	45	£495,000
Total (after rounding)	45	£500,000

Expenditure to date is limited to an estimated £1,000 in staff costs only.

Overview of Options

There is only one practicable option for this project – to maximise cost efficiencies and maintain consistency in the standard and specification of domestic components, a fixed budget term contract comprised of an agreed schedule of rates is desirable to carry out the call-backs. This approach has worked well in the recent past. The existing three year contract for Decent Homes call-backs let on this basis successfully concluded in April 2017. The alternative, specifying, procuring and delivering works to individual properties on an ad hoc basis when they become unrepairable is not recommended as it is poor practice, will not offer any cost savings through economies of scale and therefore will not be considered further. Doing nothing is not a valid option as these works are considered statutory.

Proposed Way Forward

The proposed way forward is to proceed with the sole option as described above.

Procurement Approach

The department holds a specification for Decent Homes works which has been recently refined to incorporate lessons learned from previous projects. This will be edited further to reflect any local differences that may be found. City Procurement have recommended that these works are procured via a below OJEU open tender advertised on Capital eSourcing.

Table with Financial Implications

Description	Option 1
Works Costs	£500,000
Fees & Staff Costs	£75,000
Total	£575,000
Funding Strategy	Housing Revenue Account (HRA)

Recommendations

1. That Option 1 is approved for proceeding to Procurement and Gateway 5.
2. That the estimated total project budget of £575,000 is noted.
3. That a budget of £5,000 is approved to reach the next Gateway.

Options Appraisal Matrix

See attached.

Appendices

Appendix 1	PT 4 Procurement form
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Contact

Report Author	David Downing
Email Address	david.downing@cityoflondon.gov.uk
Telephone Number	0207 332 1645

Options Appraisal Matrix

	<i>Option 1</i>
1. Brief description	Procure a contractor on a three year term contract to supply and install - at a fixed price via a schedule of rates - kitchen, bathroom and central heating facilities to City of London tenanted properties to bring them up to Decent Homes standards as and when required by the City.
2. Scope and exclusions	<p>Scope:</p> <p>The project will apply to any tenanted properties within the City's social housing stock that require this type of works.</p> <p>Exclusions:</p> <p>Properties already meeting the Decent Homes standards and properties requiring works where those works can be incorporated within a large scale programmed replacement without undue delay. Properties that are rented to leaseholders on long-lease agreements.</p>
<i>Project Planning</i>	
3. Programme and key dates	<p>Procurement – to July 2017</p> <p>Gateway 5 / Authority to Commence Works – July 2017</p> <p>Contractor Appointed – August 2017</p> <p>Works Start – September 2017</p> <p>Contract End – August 2020</p>

	<i>Option 1</i>
4. Risk implications	<p>Low overall risk.</p> <ul style="list-style-type: none"> • The works are carried out as required, at a fixed price, on instruction from the City, within a capped budget. • This approach has worked well in the recent past. The previous three year contract for Decent Homes call-backs successfully concluded April 2017.
5. Benefits and disbenefits	<ul style="list-style-type: none"> • Works can be delivered as and when required. This meets the needs of the department for example, in responding to the need to bring newly void properties back up to standard ahead of letting to a new tenant. • Working with fixed prices within a capped budget brings a firm level of financial control.
6. Stakeholders and consultees	<ul style="list-style-type: none"> • Members and Ward Members. • Officers including City Surveyors, Chamberlain's, Housing and Neighbourhood Management and Town Clerk's. • Residents of the relevant properties.
<i>Resource Implications</i>	
7. Total Estimated cost	£575,000
8. Funding strategy	The works will be funded by the Housing Revenue Account (HRA)
9. Estimated capital value/return	N/A.

	<i>Option 1</i>
10. Ongoing revenue implications	Following the completion of the project and any warranty period, the installations will be maintained through the existing reactive repairs and maintenance contract. All properties are currently included in this reactive contract; therefore there will be no cost increase to the contract.
11. Investment appraisal	Timely intervention and replacement reduces spend on reactive repairs and maintenance as unexpected failures occur less frequently.
12. Affordability	These works are a necessary part of rolling maintenance of the City of London Corporation's Housing stock. The works have been anticipated and budgeted for in the 5 and 30 year Asset Management Plans.
13. Legal implications	Failure to maintain homes to the required standard has scope for legal challenge.
14. Corporate property implications	It is important that the City's assets remain in good, safe and statutory compliant condition. Therefore all necessary action should be taken to ensure that assets are kept as such throughout the assets' lifetime.
15. Traffic implications	The detail of the traffic plan for the installation phase will be agreed with the successful contractor; however works are not anticipated to disrupt traffic.
16. Sustainability and energy implications	The installation of new central heating systems will offer improvements in energy efficiency and sustainability which may be sufficient to demonstrate an improvement in the overall SAP rating of the City's housing stock.
17. IS implications	N/A.

	Option 1			
18. Equality Impact Assessment	The proposed works will not have an impact on equality or protected characteristics. The delivery phase of the works will be carefully planned and implemented in conjunction with residents to ensure no adverse impacts.			
19. Recommendation	Recommended			
20. Next Gateway	Gateway 5 - Authority to Start Work			
21. Resource requirements to reach next Gateway	Item	Reason	Cost (£)	Funding Source
	Staff Costs	Refining specification, undertaking tender process, completing the contract letting and pre-start processes.	£5,000	HRA

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PT4 - Committee Procurement Report

This document is to be used to identify the Procurement Strategy and Purchasing Routes associated with a project and only considers the option recommended on the associated Gateway report.

Introduction

Author:	Michael Harrington		
Project Title:	Decent Homes works to properties previously omitted from programmes (Call-backs 2017-2020)		
Summary of Goods or Services to be sourced			
A three year term contract to supply and install - at a fixed price - kitchen, bathroom and central heating facilities to City of London tenanted properties to bring them up to Decent Homes standards as and when required by the City.			
Contract Duration:	36 Months	Contract Value:	£575,000
Stakeholder information			
Project Lead & Contract Manager: David Downing	Category Manager: Michael Harrington	Lead Department: DCCS Housing	
Other Contact	Department		

Specification Overview

Summary of the Specification:
Kitchen, bathroom and central heating facilities to City of London tenanted properties
Project Objectives: To maximise cost efficiencies and maintain consistency in the standard and specification of domestic components, a fixed budget term contract is desirable to carry out the call-backs.

Customer Requirements

Target completion date	August 2020	Target Contract award date	August 2017
Are there any time constraints which need to be taken into consideration?			
The previous contract ends in April 2017. It would be best to ensure that the minimal time passes between 1 contract finishing and a new one starting.			
Efficiencies Target with supporting information			
Fixed price only via a schedule of rates.			

City of London Initiatives

How will the Project meet the City of London's Obligation to Adhere to the Corporation Social Responsibility:
N/A
Take into account the London Living Wage (LLW):
N/A
Consideration for Small to Medium Enterprises (SME):
Yes
Other:

Procurement Strategy Options

Option 1: Do Nothing
Advantages to this Option:
<ul style="list-style-type: none"> No requirement from City Procurement
Disadvantages to this Option:
<ul style="list-style-type: none"> Works will not be completed Tenants will not receive their service Non-Compliant
Please highlight any possible risks associated with this option: Tenants will not receive the service.
Option 2: Below OJEU Tender
Advantages to this Option:

<ul style="list-style-type: none"> • Quicker route to market • Compliant process • Promotes competition
Disadvantages to this Option:
<ul style="list-style-type: none"> • May not receive any tenders back.
Please highlight any possible risks associated with this option: We may have to re-run the tender.
Option 3: Framework Mini-Competition
Advantages to this Option:
<ul style="list-style-type: none"> • Compliant route to market • Established and speed to market.
Disadvantages to this Option:
<ul style="list-style-type: none"> • May be seen as risk mitigation gone too far. • Low numbers of tenders registered.
Please highlight any possible risks associated with this option: Could result in no responses.

Procurement Strategy Recommendation

City Procurement team recommended option
Option 2: Below OJEU Tender

Procurement Route Options

Make v buy to be considered; also indicate any discarded or radical options

Option 1: Tender to a select list
Advantages to this Option:
<ul style="list-style-type: none"> • Can test the market first to see relevant tenders will respond. • Quick route to market.
Disadvantages to this Option:
<ul style="list-style-type: none"> • Not a compliant route. • Will need to engage with the market firms
Please highlight any possible risks associated with this option: Non-compliant route.
Option 2: Tender open to Capital eSourcing
Advantages to this Option:
<ul style="list-style-type: none"> • Open to suppliers on Capital eSourcing. • Interest would be high. • Compliant route.
Disadvantages to this Option:
<ul style="list-style-type: none"> • May receive a high amount of responses • May not appoint an appropriate contractor
Please highlight any possible risks associated with this option: Strain on resources.
Option 3: Direct Award
Advantages to this Option:
<ul style="list-style-type: none"> • No tendering processes
Disadvantages to this Option:
<ul style="list-style-type: none"> • Non-Compliant process • No competition
Please highlight any possible risks associated with this option: Not Value for money and against Procurement Regulations.

Procurement Route Recommendation

City Procurement team recommended option
Tender open to Capital eSourcing

Sign Off

Date of Report:	10/02/2017
Reviewed By:	David Downing
Department:	DCCS – Housing
Reviewed By:	Michael Harrington
Department:	Chamberlain’s Department

Committees:	Dates:	
Housing Management & Almshouses Sub Committee Projects Sub	16 May 2017 10 May 2017	
Subject: Decent Homes works to Avondale Square Estate (Phase II)	Gateway 3/4 Options Appraisal(Regular)	Public
Report of: Director of Community & Children's Services Report Author: David Downing		For Decision

Summary

Project status	Green
Project risk	Green - low
Timeline	Procurement – to July 2017 Gateway 5 / Authority to Commence Works – July 2017 Contractor Appointed – August 2017 Works Start – September 2017
Programme status	Pending Approval of Gateway 3/4 – Options Appraisal
Current estimated cost of works	£900,000
Expenditure to date	Staff Costs £1,000
Total estimated project cost	£1,035,000

Progress to Date (including resources expended and any changes since previous Gateway)

The City has a statutory duty to keep its tenanted Housing properties in good repair and meet the national Decent Homes standard for social housing. For a property to achieve this standard it must have no outstanding health and safety related repairs, be weatherproof and have 'reasonably modern' kitchen, bathroom and heating facilities. A desktop exercise has now been completed and has confirmed the extent of the works required to replace kitchens, bathrooms and/or heating equipment to meet statutory requirements in the outstanding 72 tenanted properties omitted from previous Decent Homes works on the Avondale Estate (as detailed at Gateway 1/2). Since the last Gateway, an additional two residents who had previously refused works or had not responded to requests for access have advised that they wish to be included in Phase II, thus increasing the scope of the project to 74 tenanted properties.

A cost planning exercise has also been completed upon which the following estimated costs are based:

Projected Costs - Decent Homes Avondale Phase II			
Works	Average Unit Cost	Units required	Estimated Total Cost
Kitchens	£7,000	69	£483,000
Bathrooms	£4,500	71	£319,500
Central Heating Upgrades	£4,500	21	£94,500
TOTAL			£897,000
TOTAL (rounded)			£900,000

Expenditure to date is limited to £1,000 staff costs only.

Overview of Options

There is only one practicable option for this project – procuring a principal contractor to complete a planned programme of the necessary works to replace kitchens, bathrooms and central heating systems at the identified properties. Undertaking the works reactively as items fail is not recommended as it is poor practice to wait for items to fail, and more expensive (in terms of both works cost and staff time) to procure and address these failures individually. This option will not be considered further. Doing nothing is not a valid option as these works are considered statutory.

Proposed Way Forward

The proposed way forward is to proceed with the sole option as described above.

Procurement Approach

The department holds a specification for Decent Homes works which has been recently refined to incorporate lessons learned from previous projects. This will be edited further to reflect any local differences that may be found on the Avondale Square Estate. Various options for procurement were considered as per the Committee Procurement Report attached as Appendix 1. Procuring via a framework agreement was considered but limiting the pool of prospective contractors to the typically larger corporate concerns was seen as disadvantageous on this project, where the relatively small scale of the works involved may suit a SME. City Procurement have recommended that these works are advertised on the City of London’s Capital eSourcing portal as a below OJEU open tender.

Table with Financial Implications

Description	Option 1
Works Costs	£900,000
Fees & Staff Costs	£135,000
Total	£1,035,000
Funding Strategy	Housing Revenue Account (HRA)

Recommendations

1. That Option 1, a structured programme of Decent Homes works to 74 flats on the Avondale Square Estate, is approved for proceeding to Procurement and Gateway 5.
2. That the estimated total project budget of £1,035,000 is noted.
3. That a budget of £7,000 is approved to reach the next Gateway.

Options Appraisal Matrix

See attached.

Appendices

Appendix 1	PT 4 Procurement form
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Contact

Report Author	David Downing
Email Address	david.downing@cityoflondon.gov.uk
Telephone Number	0207 332 1645

Options Appraisal Matrix

	Option 1
1. Brief description	A structured programme of works to bring the kitchen, bathroom and central heating facilities within 74 tenanted, residential properties up to modern, 'Decent Homes' standards on the Avondale Square Estate.
2. Scope and exclusions	<p>Scope: 74 tenanted properties on the Avondale Square Estate previously omitted from the prior Decent Homes programme.</p> <p>Exclusions: Properties that are rented to leaseholders on long-lease agreements. Tenanted properties in which all facilities are modern and meet the criteria for Decent Homes.</p>
Project Planning	
3. Programme and key dates	<p>Procurement - to July 2017</p> <p>Gateway 5 / Authority to Commence Works – July 2017</p> <p>Contractor Appointed – August 2017</p> <p>Works Start – September 2017</p>
4. Risk implications	<p>Low overall risk.</p> <ul style="list-style-type: none"> This type of work forms part of the core function of this department and has been carried out successfully on numerous previous occasions.

	<i>Option 1</i>
	<ul style="list-style-type: none"> • The procurement of the contractor will be carefully structured to ensure the contractor has both sufficient previous experience of this type and scale of project and appropriate levels of financial capacity. • Further residents who had previously refused or not responded to requests for access may contact officers for inclusion in the project.
5. Benefits and disbenefits	<p>Benefits</p> <ul style="list-style-type: none"> • Preservation of the City of London Corporation's assets. • Improved living conditions for residents. • Compliance with Decent Homes legislation and regulation. • Potential enhancement to Right-to-Buys sale value.
6. Stakeholders and consultees	<ul style="list-style-type: none"> • Members and Ward Members. • Officers including City Surveyors, Chamberlain's, Housing and Neighbourhood Management and Town Clerk's. • Residents of the relevant properties.
<i>Resource Implications</i>	
7. Total Estimated cost	£1,035,000
8. Funding strategy	The works will be funded by the Housing Revenue Account (HRA)
9. Estimated capital value/return	N/A.

	<i>Option 1</i>
10. Ongoing revenue implications	Following the completion of the project, including any warranty periods, the installations will be maintained through the existing reactive repairs and maintenance contract. All properties are currently included in this reactive contract; there will therefore be no cost implications.
11. Investment appraisal	Timely intervention and replacement reduces spend on reactive repairs and maintenance as unexpected failures occur less frequently.
12. Affordability	These works are a necessary part of rolling maintenance of the City of London Corporation's Housing stock. The works have been anticipated and budgeted for in the 5 and 30 year Asset Management Plans.
13. Legal implications	Failure to maintain homes to the required standard has scope for legal challenge.
14. Corporate property implications	It is important that the City's assets remain in good, safe and statutory compliant condition. Therefore all necessary action should be taken to ensure that assets are kept as such throughout the assets' lifetime.
15. Traffic implications	The detail of the traffic plan for the installation phase will be agreed with the successful contractor; however no disruption to traffic is anticipated.
16. Sustainability and energy implications	The installation of new central heating systems will offer improvements in energy efficiency and sustainability which may be sufficient to demonstrate an improvement in the overall SAP rating of the City's housing stock.
17. IS implications	N/A.

	<i>Option 1</i>			
18. Equality Impact Assessment	The proposed works will not have an impact on equality or protected characteristics. The delivery phase of the works will be carefully planned and implemented in conjunction with residents to ensure no adverse impacts.			
19. Recommendation	Recommended			
20. Next Gateway	Gateway 5 - Authority to Start Work			
21. Resource requirements to reach next Gateway	Item	Reason	Cost (£)	Funding Source
	Staff Costs	Undertaking tender process, completing the contract letting and pre-start processes.	£2,000	HRA
	Principal Designer	Advising on the suitability and health & safety of final designs.	£5,000	HRA

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PT4 - Committee Procurement Report

This document is to be used to identify the Procurement Strategy and Purchasing Routes associated with a project and only considers the option recommended on the associated Gateway report.

Introduction

Author:	Michael Harrington		
Project Title:	Decent Homes works to Avondale Square Estate (Phase II)		
Summary of Goods or Services to be sourced			
A structured programme of works to bring the kitchen, bathroom and central heating facilities within 74 tenanted, residential properties up to modern, 'Decent Homes' standards on the Avondale Square Estate.			
Contract Duration:	TBC	Contract Value:	£900,000
Stakeholder information			
Project Lead & Contract Manager: David Downing	Category Manager: Michael Harrington		Lead Department: DCCS Housing
Other Contact		Department	

Specification Overview

Summary of the Specification:
72 tenanted properties on the Avondale Square Estate previously omitted from the prior Decent Homes programme.
Project Objectives: Successful delivery of this project with the least disruption to our tenants as possible.

Customer Requirements

Target completion date	TBC	Target Contract award date	Sept 2017
Are there any time constraints which need to be taken into consideration?			
N/A			
Efficiencies Target with supporting information			
Best VfM possible			

City of London Initiatives

How will the Project meet the City of London's Obligation to
Adhere to the Corporation Social Responsibility:
Yes
Take into account the London Living Wage (LLW):
No
Consideration for Small to Medium Enterprises (SME):
Yes
Other:

Procurement Strategy Options

Option 1: Framework
Advantages to this Option:
<ul style="list-style-type: none"> Compliant Route Set list of suppliers
Disadvantages to this Option:
<ul style="list-style-type: none"> Not opening it up to the market, when available Framework maybe seen as excessive. May not receive a tender response.
Please highlight any possible risks associated with this option: No returns coming back.
Option 2: Competitive Tender
Advantages to this Option:

<ul style="list-style-type: none"> • Opens it up to the market. • Allows SME's to tender. • Should allow for a vast array of responses.
Disadvantages to this Option: <ul style="list-style-type: none"> • Multiple Responses received. • No guarantee of the quality specified in the returns
Please highlight any possible risks associated with this option: Delays due to the programme due to multiple tenders received.

Procurement Strategy Recommendation

City Procurement team recommended option
Option 1 Competitive Tender

Procurement Route Options

Make v buy to be considered; also indicate any discarded or radical options

Option 1: Above OJEU Tender
Advantages to this Option: <ul style="list-style-type: none"> • Full EU compliant route • Opens the project up to Europe
Disadvantages to this Option: <ul style="list-style-type: none"> • Maybe seen as excessive route to market. • Large amount of tenders received.
Please highlight any possible risks associated with this option: Delays to the programme due to multiple tenders received.
Option 2: Open Tender on Capital eSourcing
Advantages to this Option: <ul style="list-style-type: none"> • Opens it up to the market. • Allows SME's to tender. • Should allow for a vast array of responses.
Disadvantages to this Option: <ul style="list-style-type: none"> • Multiple Responses received. • No guarantee of the quality specified in the returns
Please highlight any possible risks associated with this option: Delays to the programme due to multiple tenders received.
Option 3: 3 Competitive Quotes
Advantages to this Option: <ul style="list-style-type: none"> • Quick route to market.
Disadvantages to this Option: <ul style="list-style-type: none"> • Non-Compliant route. • Not all tenderers may not respond
Please highlight any possible risks associated with this option: Non-Compliant route

Procurement Route Recommendation

City Procurement team recommended option
Option 2 - Open Tender on Capital eSourcing

Sign Off

Date of Report:	21/02/2017
Reviewed By:	David Downing
Department:	DCCS – Housing
Reviewed By:	Michael Harrington
Department:	Chamberlain's Department

Committees:	Dates:	
Housing Management and Almshouses Sub Committee	16 May 2017	
Projects Sub Committee	10 May 2017	
Subject: Concrete repairs to Cullum Welch House	Gateway 4 Detailed Options Appraisal(Complex)	Public
Report of: Director of Community & Children's Services Report Author: David Downing		For Decision

Summary

Project status	Green
Project risk	Green – Low
Programme status	Pending approval of Gateway 4 – Detailed Options Appraisal
Timeline	Listed Buildings Consent granted – January 2015 Project restructure – July 2016 Complete investigative work – December 2016 Gateway 4 / detailed options appraisal – May 2017 Complete design work/specification – July 2017 Procurement – September 2017 Gateway 5 – October 2017 Works start – February 2018
Expenditure to date	Concrete testing and make safe: £9,980 Concrete corrosion consultancy fees: £7,800 Architectural fees: £36,150 Structural engineer fees: £18,125 Budget cost plan: £1,950 Investigative work to south elevation: £25,099 Staff costs: £2,000
Total:	£101,104
Budget approved to current Gateway	£102,005
Estimated works cost at last Gateway	£900,000 - £1,800,000
Current works estimate	£900,000 - £1,000,000
Current total project budget estimate	£1,100,000 - £1,200,000

Last Gateway approved

An Issues Report was approved by Committee (DCCS Grand Committee 08/07/2016 and Projects Sub Committee 07/09/2016) to separate out these concrete repair works to the Grade II Listed Cullum Welch House from the wider Golden Lane and Middlesex Street Estate concrete repairs project due to the specialist design work required to replace the balustrades on the north elevation of the building. Whilst the remedial works required for these deteriorated concrete balustrades and further patch repairs to the staircases of Cullum Welch House were known at the time of this earlier report, approval was sought and granted to commission further intrusive investigative work to the pre-cast concrete planters and pot holders on the south elevation to determine if a repair in-situ was a feasible option or whether a wholesale replacement of these concrete elements would be required as well. As detailed in the Issues Report, any replacement of these elements would necessarily entail the removal of the south facing windows which sit directly upon these elements and the temporary partition of residences whilst the works were carried out. Photographs of the pre-cast units in question are presented in Appendix 1.

Progress to date including resources expended

The investigative work to the south elevation is now complete at a cost of £25,099. Our concrete corrosion consultant, Dr John Broomfield, has produced his report which identifies the causes of the deterioration - likely a mix of chlorides being cast into the concrete as a set accelerator (as was common practice at the time of manufacture), chloride build up in the soil as the small background salt levels present in water, soil and fertilisers are deposited as water evaporates, and an increased risk of carbonation due to continual wetting and drying as plants are watered – and sets out his recommendations for remedial actions.

Overview of options - North Elevation, Staircases, Beams & Ends

With regard to the north elevation balustrades, stairwells, exposed beams and slab ends, and as previously reported to Committee, Dr Broomfield has recommended the following course of action:

- (i) The concrete balustrades on the north elevation have reached the end of their safe, useful life and require like-for-like replacement in full. The patch repair of these elements is not possible; the only option for these balustrades is replacement.
- (ii) Stairwells, exposed beams and slab ends suffering from a few localised areas of cracking and spalling should be patch repaired to restore the concrete surface.

Listed Buildings consent has already been obtained for these works. For these elements of the work there is no other practicable option. As such, the options for the south elevation as presented below would need to proceed in conjunction with the above.

Overview of options - South Elevation

Following the further investigative work detailed above, Dr Broomfield has identified the following potential solutions as technically feasible for the pre-cast planters and pot holders on south elevation:

Option 1) Remove all planters and pot holders on the south elevation and replace with new ones built to current standards for the environment.

This option would be technically difficult and costly as existing planters and pot holders are structurally fixed into the walls. Furthermore, wholesale removal of these elements would necessarily entail the temporary removal of the south facing windows which sit directly upon the concrete entailing in turn the temporary partition of residences via the construction of temporary walls while the works are carried out. All flats in Cullum Welch House are bedsits and the impact of any reduction of living space for residents whilst works were ongoing would be significant. Should window removal be required to facilitate the concrete works, it is likely to be necessary – due to the age and condition of these units, particularly as they may not be able to be removed intact – to renew them. An additional application for Listed Buildings consent would also be required if windows were to be replaced. This option would allow for the replacement of the aging concrete units with purpose built modern equivalents (to the satisfaction of Listed Building constraints) but would be costly, technically challenging and hugely disruptive for residents and is therefore not recommended.

Option 2) Remove all protective coatings, patch repair as required, recoat with suitable protective coatings.

This option is the lowest cost and least disruptive option for residents (although some noise, dust and vibrations are unavoidable). Repaired concrete with a suitable protective coating will restore the appearance of the building, and in conjunction with a suitable maintenance regime (periodic inspection with a re-application of coatings every 10-20 years as required) provide a good life extension for these units. Planning officers have confirmed that these works would be covered by the existing Listed Buildings consent. This is the recommended option.

There is no option to do nothing owing to the risks, both physical and reputational, that are posed by allowing the continued deterioration of the concrete elements.

Proposed way forward

It is recommended to proceed with Option 2. This is the most cost effective and least disruptive option and will restore the units to a satisfactory condition and extend the lifespan of the concrete elements significantly. The requirement for ongoing maintenance can be rolled into existing cyclical concrete testing or external redecoration programmes as appropriate.

It is also proposed that, due to the lowering of the risk status of the project and a greater confidence in the cost estimates presented following determination of the recommended option for the south elevation, the project be moved from the Complex approval track onto the Regular track as befits these current risk and cost assessments.

Procurement Approach

City Procurement have recommended that these works are advertised as an open, below OJEU tender on the City of London's Capital eSourcing portal. An assessment of quality will form an essential part of the tender process; this is particularly important due to the Grade II Listed status of the building.

Financial Implications

Estimated costs as notified to Committee as per the preceding Issues Report:

Previous estimate notified to Committee	
Estimated works costs	£900,000 - £1,800,000
Estimated fees and staff costs	£150,000 - £250,000
Total	£1,050,000 - £2,050,000

Revised estimated costs at Gateway 4:

Description	Option 1	Option 2
Estimated works costs	£1,500,000 - £1,800,000	£900,000 - £1,000,000
Estimated fees & staff costs	£270,000	£200,000
Total	£1,770,000 - £2,070,000	£1,100,000 - £1,200,000
Funding Strategy: Housing Revenue Account (HRA); circa 47% of costs recoverable from long leaseholders.		

Recommendations

1. That Option 2, replacement of the concrete balustrades to the north elevation, patch repairs to concrete staircases, beams, slab ends and patch repair and recoating of the pre-cast concrete planters and pot holders on the south elevation, is approved for proceeding to Procurement and Gateway 5.
2. That the estimated total project budget range of £1,100,000 - £1,200,000 is noted.
3. That a budget of £25,000 is approved to reach the next Gateway.
4. That the project is transferred from the complex approval track to the regular approval track.

Options Appraisal Matrix

See attached.

Appendices

Appendix 1	Schedule of Photographs
Appendix 2	PT 4 Procurement form

Contact

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Email Address	david.downing@cityoflondon.gov.uk
Telephone Number	0207 332 1645

Options Appraisal Matrix

	<i>Option 1</i>	<i>Option 2</i>
1. Brief description	<p>Replace balustrades on north elevation, patch repairs to staircases, beams and slab ends plus:</p> <p>Remove all planters and pot holders on the south elevation and replace with new ones built to current standards for the environment, renew windows to the south elevation as required.</p>	<p>Replace balustrades on north elevation, patch repairs to staircases, beams and slab ends plus:</p> <p>Remove all protective coatings from planters and pot holders on the south elevation, patch repair as required, & recoat all with suitable protective coatings.</p>
2. Scope and exclusions	<p>Scope: Replace north elevation balustrades, patch repair staircases, beams and slab ends, replace south elevation planters and pot holders, renew windows to south elevation.</p> <p>Exclusions: Windows to north elevation.</p>	<p>Scope: Replace north elevation balustrades, patch repair staircases, beams and slab ends, repair and apply protective coatings to south elevation planters and pot holders.</p> <p>Exclusions: All windows.</p>
<i>Project Planning</i>		
3. Programme and key dates	<p>Gateway 4 – May 2017 Complete design work – September 2017 Procurement – December 2017 Gateway 5 – January 2017 Works start – Spring 2018</p>	<p>Gateway 4 – May 2017 Complete design work – July 2017 Procurement – September 2017 Gateway 5 – October 2017 Works start – February 2018</p>

<p>4. Risk implications</p>	<p>The project is currently low risk.</p> <ul style="list-style-type: none"> • Patches of deteriorated concrete have been identified, removed and made safe as part of the now completed testing contract. Protective netting is in place. • Following the testing process, the extent of repairs is well known and the associated costs can be predicted with a higher degree of accuracy. • Further Listed Buildings consent required to replace windows. • Concrete repairs are weather dependant, can only be done when surface temperatures are above 5° C. • Vulnerable residents may need to be decanted whilst works are carried out. 	<p>The project is currently low risk.</p> <ul style="list-style-type: none"> • Patches of deteriorated concrete have been identified, removed and made safe as part of the now completed testing contract. Protective netting is in place. • Following the testing process, the extent of repairs is well known and the associated costs can be predicted with a higher degree of accuracy. • Concrete repairs are weather dependant, can only be done when surface temperatures are above 5° C.
<p>5. Benefits and disbenefits</p>	<p>Benefits:</p> <ul style="list-style-type: none"> • The safety of the buildings will be confirmed and any further deterioration will be prevented. • The intervention now will prevent more major repairs in future. • Appearance of the building will be restored. • Replacement units will require minimal short term maintenance. 	<p>Benefits:</p> <ul style="list-style-type: none"> • The safety of the buildings will be confirmed and any further deterioration will be prevented. • The intervention now will prevent more major repairs in future. • Appearance of the building will be restored. • Low cost option. • Least disruptive option for residents.

	Disbenefits: <ul style="list-style-type: none"> • High cost option. • Highly disruptive for residences. • Further Listed Buildings consent required for window replacement. 	Disbenefits: <ul style="list-style-type: none"> • Planters & pot holders will become a periodic maintenance item.
6. Stakeholders and consultees	<ul style="list-style-type: none"> • Residents, including leaseholders through Section 20 consultation where they stand to incur service charges. • Departments of City Surveyor's, Town Clerks, Planning and Chamberlain's (including City Procurement). • Members and Ward Members. 	
Resource Implications		
7. Total Estimated cost	£1,770,000 - £2,070,000 The project costs included in this report are shown at current prices (03/2017 price base). As a consequence no uplift has been included for inflation.	£1,100,000 - £1,200,000 The project costs included in this report are shown at current prices (03/2017 price base). As a consequence no uplift has been included for inflation.
8. Funding strategy	Housing Revenue Account (HRA); circa 47% of costs recoverable from long leaseholders.	
9. Estimated capital value/return	N/A	
10. Ongoing revenue implications	Once works complete, concrete elements will become a periodic maintenance item.	

11. Investment appraisal	N/A	
12. Affordability	The works have been factored into the HRA Asset Management Plan.	
13. Procurement Strategy	See attached PT4 report. It is recommended that these works are advertised as an open, below OJEU tender on the City of London's Capital eSourcing portal.	
14. Legal implications	Maintaining the assets in a compliant way discharges the City's legal and statutory obligations.	
15. Corporate property implications	It is essential that the City's assets remain in good, safe and statutory compliant condition. Therefore all necessary action should be taken to ensure that assets are kept as such throughout their lifetime.	
16. Traffic implications	This would be discussed and agreed with appointed contractors where the works have any impact on roads/highways although in this case any impacts are expected to be minimal.	
17. Sustainability and energy implications	N/A	
18. IS implications	N/A	
19. Equality Impact Assessment	The proposed works will not have an impact on equality or protected characteristics. The delivery phase of the works will be carefully planned and implemented in conjunction with residents to ensure no adverse impacts.	
20. Recommendation	Not recommended	Recommended

21. Next Gateway	Gateway 5 - Authority to Start Work	Gateway 5 - Authority to Start Work		
22. Resource requirements to reach next Gateway	For the recommended option:			
	Item	Reason	Cost (£)	Funding Source
	Concrete Corrosion Consultant	Draft formal specification for tender; advise on tender returns	£6,000	HRA (including proportional recovery from long leaseholders)
	Design Fees	A sample section of balustrade is required to be removed in full to determine the fixings to the rest of the structure. This information is required to meet conditions of Listed Buildings consent prior to works commencing.	£10,000	HRA (including proportional recovery from long leaseholders)
	Quantity Surveyor	Verify cost data & advise on tender returns	£5,000	HRA (including proportional recovery from long leaseholders)
Staff Costs	Staff time – specification, tender and contract preparation.	£4,000	HRA (including proportional recovery from long leaseholders)	

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Appendix 1 - Concrete repairs to Cullum Welch House

Schedule of Photographs

North Elevation



Photograph 1: North Elevation, Cullum Welch House. Showing balustrades and external staircase.



Photographs 2a and 2b: North Elevation, Cullum Welch House. Showing damage to vertical bars of balustrade and to a cill after removal of loose concrete. Photographs were taken before the installation of safety netting.

South Elevation



Photograph 3: South Elevation, Cullum Welch House. Concrete elements are painted white.



Photograph 4: South Elevation, Cullum Welch House. View of typical windows planters and pot holders which span two dwellings (partition wall at the centre of the view). Photograph was taken before the installation of safety netting.



Photograph 5: South Elevation, Cullum Welch House. Close up view of planter and pot holder showing spalled concrete and exposed rebar after removal of loose material.

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PT4 - Committee Procurement Report

This document is to be used to identify the Procurement Strategy and Purchasing Routes associated with a project and only considers the option recommended on the associated Gateway report.

Introduction

Author:	Michael Harrington		
Project Title:	Concrete repairs to Cullum Welch House		
Summary of Goods or Services to be sourced			
Replacement of the balustrades to the north elevation, patch repairs to staircases, beams, slab ends and patch repair and recoating of the planters and potholders on the south elevation			
Contract Duration:	TBC	Contract Value:	£1,100,000
Stakeholder information			
Project Lead & Contract Manager: David Downing	Category Manager: Michael Harrington		Lead Department: DCCS – Housing
Other Contact		Department	

Specification Overview

Summary of the Specification:
Replacement of the balustrades to the north elevation, patch repairs to staircases, beams, slab ends and patch repair and recoating of the planters and potholders on the south elevation
Project Objectives: Remove all protective coatings, patch repair as required, recoat with suitable protective coatings.
<ul style="list-style-type: none"> • The safety of the buildings will be confirmed and any further deterioration will be prevented. • The intervention now will prevent more major repairs in future. • Appearance of the building will be restored. • Least disruption to residents.

Customer Requirements

Target Start date	October 2017	Target Contract award date	August 2017
Are there any time constraints which need to be taken into consideration?			
None			

Efficiencies Target with supporting information	
Best quality job for the best price possible.	

City of London Initiatives

How will the Project meet the City of London's Obligation to
Adhere to the Corporation Social Responsibility:
Yes
Take into account the London Living Wage (LLW):
No
Consideration for Small to Medium Enterprises (SME):
Yes
Other:
<ul style="list-style-type: none"> • Fly-ash content • Imbedded carbon • Transportation and delivery

Procurement Strategy Options

Option 1: Open Tender
Advantages to this Option:
<ul style="list-style-type: none"> • Allows us to engage with the market as a whole. • Allows the City to build the specification it requires and work to the timescales it requires. • Allows us to engage with SME's as opposed to using a framework, which stereotypically have larger suppliers appointed to them.

Disadvantages to this Option:
<ul style="list-style-type: none"> • Will take longer to engage with the market. • Tender may be seen as too much of a strain on resources for parties to participate.
Please highlight any possible risks associated with this option:
<ul style="list-style-type: none"> • No guarantee of the quality of responses returned. • Responses could possibly be over OJEU threshold.
Option 2: Framework
Advantages to this Option:
<ul style="list-style-type: none"> • Quicker engagement with the market. • Pre-vetted suppliers on the framework.
Disadvantages to this Option:
<ul style="list-style-type: none"> • Less engagement with SME's • Larger Suppliers will subcontract the work as opposed to having employees working directly on the project.
Please highlight any possible risks associated with this option:
<ul style="list-style-type: none"> • The quality of the service and works carried out could be lower than expected.

Procurement Strategy Recommendation

City Procurement team recommended option
Option 1

Procurement Route Options

Make v buy to be considered; also indicate any discarded or radical options

Option 1: Open Below OJEU Tender
Advantages to this Option:
<ul style="list-style-type: none"> • Open to all parties registered within Capital eSourcing. • Wide Range of suppliers able to access the tender.
Disadvantages to this Option:
<ul style="list-style-type: none"> • High volumes of responses would result in admin heavy evaluations
Please highlight any possible risks associated with this option: Increased workloads because of the popularity of the tender during evaluation, causing slippage in the programme.
Option 2: Select list to Tender
Advantages to this Option:
<ul style="list-style-type: none"> • Reduced admin
Disadvantages to this Option:
<ul style="list-style-type: none"> • Non-Compliant
Please highlight any possible risks associated with this option: Contradicts the City's policy on procurement

Procurement Route Recommendation

City Procurement team recommended option
Option 1

Sign Off

Date of Report:	
Reviewed By:	
Department:	
Reviewed By:	
Department:	Chamberlain's Department

Committees:	Dates:	Item no.
Projects Sub Housing Management and Almshouses Sub-Committee	17/02/2017 16/05/2017	
Subject: Gateway 3/4 Options Appraisal: Petticoat Tower Stairwell Panels	Gateway 3/4 Options Appraisal	Public
Report of: Director of Community & Children's Services		For Decision

Summary

Dashboard

Project Status	Green
Time Line	Specification of Works: July 2017 Undertake Procurement: October 2017 Contract Let: March 2018 Works Start: May 2018 Works Complete: November 2018
Programme status	Pending Approval of Gateway 3/4 – Options Appraisal
Latest estimated cost of works	£383,000
Expenditure to date	Survey & Specification, Staff Costs and H&S Works £16,556
Total Project Cost	£429,000

Progress to date (including resources expended and any changes since previous gateway)

The Gateway 1/2 report outlined the need to undertake a stock condition survey on the Petticoat Tower Stairwell Panels to assess current safety issues as well as a feasibility study to explore a variety of options.

A detailed survey was carried out by a firm of Chartered Surveyors and forms the basis of this report which seeks approval of the programme and budget prior to procurement for a contractor to complete these works. The survey looked at options including continued repair and maintenance, feasibility of full replacement on a like for like basis and additional options of fully enclosed systems for the stairwells.

Due to the urgent nature of the works and from a Health & Safety perspective we raised a priority order for the erection of a scaffolding protection fan at the base of the Petticoat Tower, and installation of safety netting to the two elevations where the glass panelling is situated. We are now seeking approval for the costs accrued so far to be retrospectively agreed, as well as approval for the costs for the continued scaffold hire until we receive authority to start works Gateway 5.

Overview of options:

Appendix 1 includes visualisation of the various options that were considered.

Option 1 Glazing Refurbishment

One off replacement of defective and missing panels. Continue to assess and test the assets on a regular basis, undertaking ad-hoc repair works in a reactive fashion. However, future failure would mirror current H&S issues, specifically glazing falling from height in close proximity to public highways and children's play area.

Option 2 Replacement - Reglit Curtain Wall System

Reglit are a glazing supply and installation company with close ties to Pilkington Glass, and are currently replacing a similarly degrading glazed system at Guildhall West Wing.

Reglit's recommendation makes it clear that the existing design at Petticoat Tower could not be replaced on a like-for-like basis as the glazing was not designed to be installed in an off-set arrangement. Furthermore, they highlighted that no consideration had been made for the expected wind-loads that the glass panels are currently being subjected to.

Their recommendation is that the existing system should be replaced with an enclosed system similar to the current installation being undertaken at Guildhall West Wing.

Option 3 Replacement - Schüco FW50 Curtain Wall System

The Schüco aluminium framed Glazed Curtain Wall System which is a floor to ceiling glazed curtain wall system similar to surrounding buildings, came recommended by a number suppliers. The design ensures that the stairwell would be fully protected from the elements, and lighting levels maintained. Furthermore, it could be replicated to match the existing enclosed design at Petticoat Square.

Option 4 Replacement - Graepels Panel Systems

This manufacturer's designs have been investigated as a cost-effective solution which still allows light and ventilation through to the stairwell and bin chute areas. Designs can either be supplied as a flat perforated metal acting as a curtain wall system, or as perforated metal planks to mimic the existing installation.

Proposed Way forward and summary of recommended option

Having explored the various options and considered the advantages and disadvantages of each it is our recommendation to approve option 3. Having consulted with Planning there is no issue with replacement on a non "like-for-like" basis as long as the design does not appear incongruous with the surrounding environment.

Procurement Approach

Given the relatively small cost of the works, and subject to approval of Option 3, City Procurement will be asked to invite three specialist contractors to carry out the works as specified by our Consultant via a standard quotation exercise. Option 3 will be set out within the tender documentation.

Table with Financial Implications

Description	Option 1	Option 2	Option 3	Option 4
Works Costs	£540,000	£431,000	£383,000	£351,000
Fees & Staff Costs	£65,000	£52,000	£46,000	£42,000
Total	£605,000	£483,000	£429,000	£393,000

Funding Strategy: Housing Revenue Account (HRA) which includes service charge recovery from leaseholders for most works (current proportion circa 36%).

Recommendations

- Note the budget of £429,000
- That Option 3 is approved for proceeding to Procurement and Gateway 5.
- Approve the £35,839 as detailed at section 20 of the options appraisal (which includes):
 - £18,000 resources required to reach next gateway.
 - Retrospective approval of the £13,354 associated with the installation of the scaffolding and debris netting under Health & Safety requirements.
 - The on-going costs for the hire of scaffolding up to Gateway 5.

Options Appraisal Matrix

See attached.

Appendices

Appendix 1	Summary of Options
Appendix 2	PT 1 Report

Contact

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Telephone Number	020 7332 3010

Options Appraisal Matrix

	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>	<i>Option 4</i>
1. Brief description	Working with the existing system in place on a refurbishment basis. Replacing defective & missing panels. Requires additional works around the re-design and replacement of the existing fixing panels and brackets.	Replacement with a like-for-like system is not a valid option. Reglit have recommended that we remove and replace with a curtain-wall design using similar panes of glass as existing, although the new arrangement would create a totally enclosed space.	Remove and replace with Schüco Façade FW-50+, which is a floor to ceiling glazed curtain wall system, replicating a similar design to the existing one at Petticoat Square.	Remove and replace with a Graepels Panel Perforated Metal System, which can be supplied as a flat panel acting as a curtain wall system, or as planks to mimic the existing installation.
2. Scope and exclusions	Refurbishment of the existing system, or removal and replacement with alternative systems. Including removal costs, scaffolding costs, skip and waste removal, pavement licences, hoisting, vertical distribution and storage facilities Excluding: <ul style="list-style-type: none"> • Internal equipment e.g. lifts, handrails, lighting. • Any other works already covered by other projects, such as concrete repair. 			
Project Planning				
3. Programme and key dates	<ul style="list-style-type: none"> • Specification of works: July 2017 • Undertake Procurement: October 2017 • Contract Let: March 2018 • Works Complete: November 2018 			

	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>	<i>Option 4</i>
4. Risk implications	<ul style="list-style-type: none"> • Health and Safety of residents and staff is compromised if assessments, testing and any associated works are not carried out in a timely fashion. • That option 3 is not approved by Planning. 			
5. Benefits and disbenefits	<p><u>Benefits:</u></p> <ul style="list-style-type: none"> • Low level of waste required to be removed from site. • No planning restrictions to be considered. <p><u>Disbenefits:</u></p> <ul style="list-style-type: none"> • Future failure would mirror current H&S issues, specifically glazing falling from height. • Panels are not designed for the wind-loading required in the existing offset arrangement. • Future replacements / isolated repairs would have to be undertaken externally, with the 	<p><u>Benefits:</u></p> <ul style="list-style-type: none"> • Any future failure of the system after time would still maintain the glazed materials fixed in place, and therefore the current scenario of falling glazing would not be encountered. • System has similar appearance to the existing; possibly negating the need for planning approval, or likely to be approved if planning is required. • Potentially provides the longest guarantee based on materials. • Stairwell would be fully protected from the elements, and light levels maintained. 	<p><u>Benefits:</u></p> <ul style="list-style-type: none"> • The approximate costs have included access arrangements. • The design ensures that the stairwell would be fully protected from the elements, and light levels maintained. • Offers a standard life expectancy, and glazed louvres can be inserted into the screens for ventilation. • Similar design to that on the enclosed stairwell at Petticoat Square. • Second cheapest in terms of cost and considered as most viable option in terms of design and value for 	<p><u>Benefits:</u></p> <ul style="list-style-type: none"> • Cost-effective as a full replacement option. • It can be replaced in a like-for-like plank design, which may be easier to achieve Planning approval. • The system could possibly be replaced internally for isolated repairs. • Installation could be undertaken via mast climber/cradle. • Ventilation requirements are maintained, and due to the durability of the materials and fixings the system has a long life expectancy.

	Option 1	Option 2	Option 3	Option 4
	<p>additional costs incurred for access.</p> <ul style="list-style-type: none"> • Further investigations would need to be undertaken to assess additional safety measures for the fixing mechanisms which potentially may require new design and installation. • Most costly of all the options. 	<ul style="list-style-type: none"> • Additional fixings should ensure the system is more stable than the existing system. • Future system failure is likely to be only at the silicon joins between the glazed panes, which shouldn't be an issue within the stairwell areas. <p><u>Disbenefits:</u></p> <ul style="list-style-type: none"> • Notwithstanding the above, this is the second most expensive option. • City Surveyors highlighted the concerns raised at committee about costs associated with the replacement of similar system on Guildhall West Wing Staircase. 	<p>money.</p> <p><u>Disbenefits:</u></p> <ul style="list-style-type: none"> • Although it will match more closely the design of the enclosed stairwell at Petticoat Square, it is a move away from the current design. • Planning permission is required. However, initial feedback following consultation indicates that there would be no issue with non "like-for-like" replacement as long as design was not incongruous with the surrounding environment. 	<p><u>Disbenefits:</u></p> <ul style="list-style-type: none"> • Further modelling would be required to assess wind noise, water penetration and to ensure lighting levels are maintained. • It is also possible that the failure of fixings would recreate the highly dangerous falling panel scenario currently being experienced. • However, WPL-UK confirms that they could undertake 5-yearly maintenance checks to minimise this risk over the lifetime of the system.

	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>	<i>Option 4</i>
6. Stakeholders and consultees	<ul style="list-style-type: none"> Residents, including leaseholders through Section 20 where they stand to incur service charges. Departments of Community and Children's Services, City Surveyor's, Town Clerks and Chamberlain's (including CLPS) and London Fire brigade. 			
Resource Implications				
7. Total Estimated cost	£605,000	£483,000	£429,000	£393,000
8. Funding strategy	Housing Revenue Account (HRA) which includes 36% service charge recovery from leaseholders for most works			
9. Estimated capital value/return	N/A	N/A	N/A	N/A
10. On-going revenue implications	Future revenue implications will be as per the existing freeholder obligations of repair and maintenance under the conditions of the lease agreements.			
11. Investment appraisal	N/A			
12. Affordability	These works are a necessary part of rolling maintenance of the City of London Corporation's Housing stock and have been included in the 5 and 30 year Asset Management Plans.			
13. Legal implications	<ul style="list-style-type: none"> The safe maintenance of the facilities supplied by the landlord/freeholder is a prime legal duty. Reputational damage caused to the City of London by failing to perform legal duty to keep assets in a good state of repair. 			

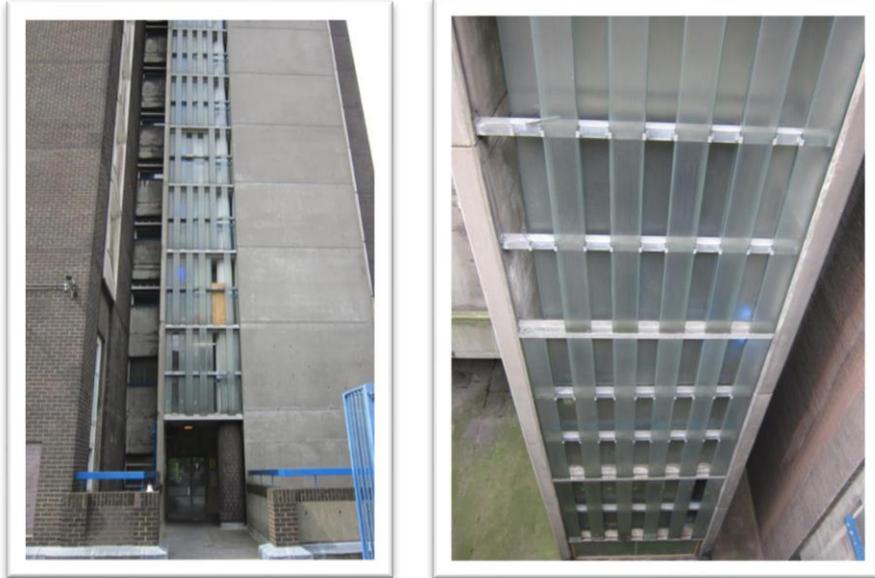
	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>	<i>Option 4</i>
14. Corporate property implications	It is important that the City's assets remain in good, safe and statutory compliant condition. Therefore all necessary action should be taken to ensure that assets are kept as such throughout the assets' lifetime.			
15. Traffic implications	Any traffic implications would be negotiated with the works contractor(s) at the pre-contract and pre-start stages.			
16. Sustainability and energy implications	There are no known sustainability and energy implications.			
17. IS implications	N/A.			
18. Equality Impact Assessment	The delivery phase of the works will be carefully planned and implemented in conjunction with residents to ensure no adverse impacts. An equality assessment will be carried out and a Design Risk Assessment will be required as part of the specification process.			
19. Recommendation	Not recommended	Not recommended	Recommended	Not recommended
20. Next Gateway	Gateway 5 - Authority to Start Work			

	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>	<i>Option 4</i>
21. Resource requirements to reach next Gateway	These costs relate to the recommended option 3			
	Item	Reason	Cost (£)	Funding Source
	Staff Time	Managing the design, procurement and contract-letting process.	£2,000	HRA (including proportional recovery from long leaseholders)
	Surveyor Cost	Undertaking professional Quantity Surveying Services.	£9,000	HRA (including proportional recovery from long leaseholders)
	Principal Designer (formerly CDM)	Satisfy the legal requirements of the CDM Regulations 2015	£7,000	HRA (including proportional recovery from long leaseholders)
	Works (installation of scaffolding & debris netting) & continued scaffold hire up to Gateway 5	Health & Safety	£17,839	HRA (including proportional recovery from long leaseholders)
	Total		£35,839	

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APPENDIX 2: Petticoat Tower - Summary of Options

Option 1 – Glazing Refurbishment



Considerations:

- Replacement of missing & defective panels and Introduction of a saddle bracket and associated isolation to all of the mid-span glass steel junctions.
- Introduction of an additional aluminium flat plate to the external horizontal existing framework to increase the glass plank frame coverage.
- Reinforcement/revision of the internal plank base bracket.
- Generally all existing fixings/glass isolators should be checked and replaced as required.

Option 2 Replacement - Reglit Curtain Wall System

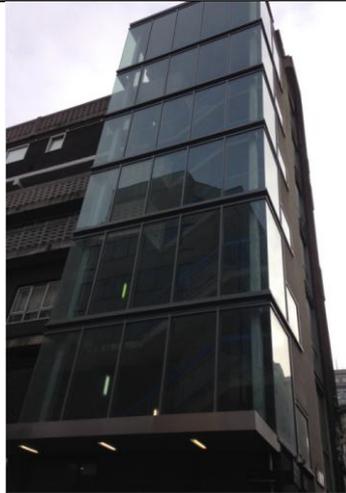


Considerations:

Reglit made it clear that they believed that the existing glass could not be replaced on a like-for-like basis, as the glazing was not designed to be installed in an off-set arrangement. Furthermore, they noted that no consideration has been made for the expected wind-loads the glass is being subjected to.

It is their recommendation that the system is removed and replaced with the Pilkington Profilit U-glazing system, a curtain-wall design using similar panes of glass as existing, although the new arrangement would create a totally enclosed space.

Option 3 Replacement - Schüco FW50 Curtain Wall System



Considerations:

The system recommended for this project would be the Schüco Façade FW-50+, which is a floor to ceiling glazed curtain wall system. The proposed solution would involve the removal of the individual off set glazing panels and installation of an enclosed system similar to the existing system at Petticoat Square, as shown above.

Option 4 Replacement - Graepels Panel Systems



Considerations:

A cost-effective solution which still allows light and ventilation through to the stairwell and bin chute areas. Designs utilise perforated metal materials and can either be supplied as a flat panel acting as a curtain wall system, or as planks to mimic the existing installation.

Due to the curved edging of the panels, the depth and fixing points would be similar to the existing system.

The material could also be powder-coated providing a number colour options, although this may limit the lifespan to circa 30 years.

A more durable option would be the anodised panels which would increase the lifespan of the material up to circa 40 years.

PT1 – Specification for goods/services or works between £10,000 & £100,000 (services) / £400,000 (works)



Please complete all fields, referring to guidance notes at end of document. Where the specification is set out in a separate document please state 'See Attached' where applicable.

Summary of goods, services or works	
Requirement category	Works
Brief description of your requirement Insert a brief description of what you want to buy	Replacement of the existing windows and doors with an equivalent layout, with double glazing. At Middlesex Street Estate, Petticoat Tower
Aims and objectives This should include: <ul style="list-style-type: none"> • Overall aims of the project • Proposed outcomes • Corporate Social Responsibility 	To ensure high quality delivery of the project within budget and with the tenants experiencing the least amount of disruption.
Pricing type	Fixed Price
Technical Requirements Please refer to guidance notes	
Internal Approvals required	Committee
Location Insert address	Petticoat Tower, Middlesex Street
Details for site visit If applicable insert date and contact details for site visit	TBC
Has anyone external to City of London been involved in the preparation of this specification?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Will the contractor be occupying City of London premises? *If yes, City Procurement, City Surveyors and Comptrollers comments and approval are required to determine Lease arrangements. Comments & approval should be entered on page 2.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Will City of London receive income generated by the contract (other than rent)? If yes, City Procurement, City Surveyors and Comptrollers comments and approval are required to determine arrangements for a Concession contract. Comments and approval should be entered on page 2.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Timescales	
Services/Works	Start Date: June 2017 End date: September 2017
Goods	Delivery date: N/A

Type of purchase	
Type of purchase	One-off
Budget Estimate	£383,000
Approved budget?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Project specific questions	
Standard weighting is 60% (Quality) / 40% (Price) unless otherwise expressed	
Questions	Scoring (to add up to 100%)
Q1.	Q1. <Choose a weighting>
Q2.	Q2. <Choose a weighting>
Q3.	Q3. <Choose a weighting>

Identified Suppliers			
Supplier Name	Reason for selection	On CBIS	Local/SME
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>

		<input type="checkbox"/>	<input type="checkbox"/>
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Terms and Conditions	E - Building Works
Contract exempt from Transparency Code publication	No

Requestor	Jason Crawford
Department	DCCS - Housing
Comments Please input any additional comments or information	Subject to committee approval we will liaise with City Procurement to invite three specialist contractors to carry out the works as specified by our Consultant via a standard quotation exercise.

*City Procurement comments and approval where a contractor will be occupying City of London premises and/or the City will receive rent or other income	
*City Surveyors comments and approval where a contractor will be occupying City of London premises and/or the City will receive rent or other income	
*Comptrollers comments and approval where a contractor will be occupying City of London premises and/or the City will receive rent or other income	

Office use:

Requisition	
Buyer	

Process steps

Action	Timescale	Procurement Activities	Officer Activities
City Procurement receives an approved requisition with completed specification attached.	3 working days	Allocation to buyer Validation or creation of supplier list Creation of project on Capital Contact suppliers	Respond to Buyer queries; agree quote documentation
Request for quotation – price only	Minimum of 5 working days	Issue documents Manage queries from suppliers Provide tender summary Update officer	Respond to queries
Request for quotation – project specific questions	Minimum of 10 working days	As above	Evaluate project specific questions.
Request for quotation – non compliant response	Additional 5 working days	Manage clarification process	Support clarification process
Contract execution (over £50k)	Additional 5 working days	Co-ordinate signatures	Obtain City signature
Post-tender administration	Within 3 days of completion	Convert requisition to PO Notify successful and unsuccessful suppliers Close project on capital	Goods receipt
Contract published	Automatically	Contract details published on London Councils Portal	

Glossary:

Term	Meaning
Capital	Capital E-Sourcing the City's e-sourcing portal
Contract execution	The time taken for the City to create the contract and issue to the supplier for signature.
Estimated budget	The amount of money allocated for the requirement or the amount spent in previous years.

Non-compliant request	When the returns from a supplier are not in line with what was requested: - doesn't agree with terms and conditions - can't provide requested insurances - Doesn't return all documents - Doesn't meet the requirements of the specification
Goods	All items, supplies, materials, equipment and furniture, computer, IT and telecommunications equipment; software, office supplies; household appliances and furniture.
Quote	The City of London requesting a prices for works/goods or services
Requisition	A form in CBIS/Oracle which authorises City Procurement to undertake a quote process
Service Level Agreement/SLA	Agree level of service required under the Agreement
Services	Services such as repairs and maintenance; advisory; design; cleaning etc.
Specification/Scope	The requirements
Technical Requirements	What is to be delivered by the supplier
Transparency Code	Local Government code to increase democratic accountability; making it easier for local people to contribute to local decision making processes
Works	Infrastructure projects to construct, improve, rehabilitate, demolish, repair, restore, or maintain buildings, roads and bridges, etc.

Notes:

1. Officers are responsible for providing a sufficient level of information to enable City Procurement to approach the market for quotes. Specifications with insufficient information will be returned to officers for completion. In the event that a form is returned the timescales maybe extended.
2. Requisitions without a completed specification (or waiver) will be returned to the Officer for further action.
3. Timescales are minimum timescales; both buyers and Officers can recommend these are extended.
4. If a site visit is required then additional time should be allowed during the tender process.
5. In the event that all suppliers refuse to accept the nominated terms and conditions a Chief Officer will be required to accept the risk; or a retender will be required.
6. If the award criteria is price only and the Officer does not want to accept the cheapest price then authority from the Chief Officer (or a waiver) is required.
7. It is the Officer's responsibility to complete any internal approval processes or consultations required to accept the preferred quote within the agreed timescales. Any delay in achieving approvals may impact the agreed timescales.

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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