



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

Date: TUESDAY, 26 SEPTEMBER 2017

Time: 1.45 pm

Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

Members:

Randall Anderson (Chairman)	Dhruv Patel
John Fletcher (Deputy Chairman)	Susan Pearson
Mary Durcan, Cripplegate	Deputy Elizabeth Rogula
Marianne Fredericks	Deputy John Tomlinson
Alderman David Graves	Deputy Henry Jones
Barbara Newman	

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Lunch will be served in Guildhall Club at the rising of the Committee
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. **MINUTES**
To approve the public minutes and non-public summary of the meeting on 3rd July 2017.

For Decision
(Pages 1 - 8)
4. **MAIS HOUSE DECANT PROGRAMME - UPDATE**
Report of the Director of Community and Children's Services.

For Information
(Pages 9 - 12)
5. **CITY OF LONDON ALMSHOUSES UPDATE**
Report of the Director of Community and Children's Services.

For Information
(Pages 13 - 14)
6. **CUSTOMER SERVICE STANDARDS REVIEW**
Report of the Director of Community and Children's Services.

For Decision
(Pages 15 - 30)
7. **HOUSING ALLOCATIONS SCHEME 2017**
Report of the Director of Community and Children's Services.

For Decision
(Pages 31 - 130)
8. **HOUSING STRATEGY**
Report of the Director of Community and Children's Services.

For Information
(Pages 131 - 136)
9. **FIRE SAFETY**
Report of the Director of Community and Children's Services.

For Decision
(Pages 137 - 140)
10. **GATEWAY 7 - OUTCOME REPORT: - REFURBISHMENT WORKS TO DOOR ENTRY SYSTEMS AT THE GOLDEN LANE (PARTIAL), HOLLOWAY AND YORK WAY ESTATES**
Report of the Director of Community and Children's Services.

For Decision
(Pages 141 - 146)

11. **GATEWAY 7 - OUTCOME REPORT: DECENT HOMES WORKS TO PROPERTIES PREVIOUSLY OMITTED FROM PROGRAMMES PROGRAMMES (CALL-BACKS 2013-17)**
Report of the Director of Community and Children's Services.

For Decision
(Pages 147 - 150)

12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

13. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

14. **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

15. **NON-PUBLIC MINUTES**

To approve the non-public minutes of the meeting held on 3rd July 2017.

For Decision
(Pages 151 - 152)

16. **THE CITY OF LONDON ALMSHOUSES (1005857)**

Report of the Director of Community and Children's Services.

For Decision
(Pages 153 - 160)

17. **INCIDENT AT CITY OF LONDON ALMSHOUSES**

Report of the Director of Community and Children's Services.

For Decision
(Pages 161 - 164)

18. **GATEWAY 5 - AUTHORITY TO START WORK: WILLIAM BLAKE ESTATE CCTV INSTALLATION**

Report of the Director of Community and Children's Services.

For Decision
(Pages 165 - 182)

19. **WELFARE BENEFITS UPDATE & FINANCIAL INCLUSION PROGRAMME**
Report of the Director of Community and Children's Services.

For Information
(Pages 183 - 194)

20. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
21. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

On the rising of the Sub Committee, there will be a Members' Briefing Session on Rent Setting and Collection

HOUSING MANAGEMENT AND ALMSHOUSES SUB (COMMUNITY AND CHILDREN'S SERVICES) COMMITTEE
Monday, 3 July 2017

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

Present

Members:

Randall Anderson (Chairman)
Mary Durcan
John Fletcher (Deputy Chairman)
Marianne Fredericks
Alderman David Graves
Barbara Newman
Dhruv Patel
Susan Pearson
Deputy Elizabeth Rogula
Deputy John Tomlinson
Deputy Henry Jones

Officers:

Alistair MacLellan	-	Town Clerk's Department
Mark Jarvis	-	Chamberlain's Department
Andrew Carter	-	Director of Community and Children's Services
Jacquie Campbell	-	Assistant Director of Housing and Neighbourhoods
Paul Murtagh	-	Assistant Director of Barbican and Property Services
Bayo Igoh	-	Head of Estates
Amy Carter	-	Projects and Improvements Manager
Paul Jackson	-	Service Review Consultant
Jacqueline Whitmore	-	Sheltered Housing Manager
Wendy Giaccaglia	-	Area Manager, Out of City Estates
Liam Gillespie	-	Area Manager, City and Fringe

1. APOLOGIES

The meeting commenced at 2.05pm.

There were no apologies. The Town Clerk noted that Marianne Fredericks would be arriving late.

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

Susan Pearson declared an interest in housing matters, as a leaseholder in Golden Lane Estate, and Deputy Henry Jones declared an interest in matters relating to the Middlesex Street Estate, as he was a residential and business lease holder.

3. **MINUTES**

RESOLVED – That the public minutes and non-public summary of the meeting held on 16 May 2017 be approved as a correct record, subject to Jacqueline Whitmore (Sheltered Housing Manager) being listed as in attendance.

Matters Arising

Housing Estates - Allocated Members

Members agreed that Mary Durcan, Barbara Newman and Henry Jones be designated as Allocated Members to the Middlesex Street Estate.

4. **PARKGUARD PRESENTATION**

Members received a presentation from Parkguard Ltd and the following points were made.

- There was a disproportionate perception of anti-social behaviour (ASB) on the Middlesex Street Estate. Parkguard had identified the fact that ASB was occurring on the periphery of the estate and was therefore documenting the time and location of ASB and liaising with local police to build an intelligence picture from which planned actions would take place. Parkguard continued to provide community reassurance by providing security guards on the estate at times of high footfall.
- Parkguard's partnership working with police had increased – of 130 recent patrols conducted by Parkguard, 109 of those had been in partnership with a police officer. Patrols had identified an increase in paraphernalia in Mansell Street. In response to a question, the Parkguard representative replied that paraphernalia depended on the local context – often the paraphernalia related to Class A drugs.
- In response to a question from a Member, the Parkguard representative replied that their activities had produced more work for the local police due to increased reporting, but that work was underpinned by a high quality of information and intelligence that allowed the police to undertake successful operations.
- In response to a question from a Member, the Assistant Director of Housing and Neighbourhoods replied that the Parkguard contract did not cover the Barbican Estate and therefore Barbican residents would need to raise ASB issues with the Barbican Estate Office. The Assistant Director of Barbican and Property Services added that there were no plans to install CCTV in the Barbican Estate.

- Members thanked Parkguard Ltd for their work across the City's estates.

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

Members received an update report of the Director of Community and Children's Services regarding the Mais House Decant Programme and the following points were made.

- The Sheltered Housing Manager noted that a further 5 moves had taken place since the report was published. The London Borough of Lewisham had been particularly helpful and had allowed the City to register Mais House residents on their housing database. Furthermore a local charity had come forward with a disabled flat for a current Mais House resident.
- The Sheltered Housing Manager concluded by noting a BBQ would be held on 12 August, with former residents also invited, and Members of the Sub Committee were invited also.
- In response to a question from a Member, the Sheltered Housing Manager replied that the profile of Mais House residents left was generally those of between 70-80 years of age who wished to stay in the area due to local links with family and/or carers.

RECEIVED

6. **HOUSING UPDATE**

Members received an update report of the Director of Community and Children's Services on housing matters and the following points were made.

- The Head of Estates noted that a high level of ASB was being reported across City estates at present, featuring enviro-crime in particular. Whilst each case was swiftly dealt with, Officers were reviewing reporting practices and seeking to identify the underlying causes for the increase.
- Gas servicing checks had been carried out by Carillion and 98.34% of City estate properties currently held CP12 gas safety certificates. This was below target but an improvement on 2015/16.
- A Member noted that the time period of the report and of the Estate Management section in particular was October 2016-March 2017, which made the report contents rather dated given it was now July 2017. The Head of Estates noted that monthly figures were available and could be provided to Members.
- In response to a comment from a Member regarding the length of time it took to re-let a City property, the Assistant Director of Housing and Neighbourhoods replied that the level of checks undertaken prior to the let of social housing was very intensive, which delayed the process. Moreover the City often took the opportunity to renovate vacant properties prior to them being relet,

Marianne Fredericks arrived at this point of the meeting.

- In response to a comment from a Member, the Assistant Director of Housing and Neighbourhoods agreed to provide a monthly dashboard covering applications to the City's housing register.

RECEIVED

7. HOUSING AND NEIGHBOURHOODS PROFESSIONAL DEVELOPMENT - TRAINING PROGRAMME UPDATE

Members received an update report of the Director of Community and Children's Services regarding the Housing and Neighbourhoods Professional Development Training Programme. The Projects and Improvement Manager noted that Project Argos listed in the appendix related to anti-terrorism training.

RECEIVED

8. FINANCIAL SUPPORT FOR LEASEHOLDERS

Members received a report of the Director of Community and Children's Services regarding financial support for leaseholders and the following points were made.

- The Head of Estates noted that Members should be mindful of legal obligations including the Housing Revenue Account (HRA).
- A Member noted that he felt the City of London Corporation should offer as much financial support as possible in line with statutory considerations. He would welcome a breakdown of the estimated costs.
- In response to some observations from a Member, the Head of Estates agreed to model what financial support would look like if the loan limit was increased, an early repayment option was implemented, and the loan repayment period was extended beyond 10 years.
- A Member suggested that any loans should be offered interest free.
- In response to a question from a Member, the Director of Community and Children's Services replied that the 'buy back' option was standard practice across all local authorities.
- In response to a question from a Member, the Director of Community and Children's Services confirmed that loans would not be offered to persons who owned the property in question as a second home.

RECEIVED

9. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

Shops in Middlesex Street

In response to a question from a Member, the Director of Community and Children's Services agreed to provide an update on this issue outside of the meeting.

Community and Children's Services Risk Register – Housing

In response to a question from a Member, the Director of Community and Children's Services agreed that the housing element of the Community and Children's Services Department Risk Register could be submitted to this Sub Committee prior to its submission the Community and Children's Services Committee.

10. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

Fire Safety in the City's Residential Blocks

Members considered a late report of the Director of Community and Children's Services on Fire Safety in the City's Residential Blocks and the following points were made.

- A Member commented that she had read the Golden Lane Fire Risk Assessment (FRA) and that some identified risks that had required action had still not been dealt with. In response, the Director of Community and Children's Services noted that the FRA had not identified any high risks and instead had only identified some medium risks. Works to address those risks was being undertaken.
- The Assistant Director of Housing and Neighbourhoods noted that estate managers had put a lot of effort into encouraging residents to be mindful of removing objects such as outdoor furniture or bulky items that risked cluttering stairwells and corridors.
- In response to a comment from a Member, the Assistant Director of Housing and Neighbourhoods agreed to provide dates and milestones for the fire safety measures outlined within the report.
- In response to a comment from a Member, the Assistant Director for Barbican and Property Services noted that his staff were reviewing whether alarms that alerted the London Fire Brigade directly should be installed across the City's estates.
- In response to a comment from a Member, the Director of Community and Children's Services confirmed that the City had the resources it needed to ensure fire safety. That said, demand for inspections and materials was high at present due to national demand and therefore high rise blocks were being prioritised first.
- In response to a comment from a Member, the Director of Community and Children's Services said that a feasibility study would be conducted before a recommendation was put to Members on whether sprinklers

should be retrofitted across the City estates. The feasibility report would be submitted to Members in late 2017.

- In response to a question from a Member, the Director of Community and Children's Services confirmed that the City was compliant in terms of leaseholder subletting.
- In response to a comment from a Member over the need to ensure fire doors were as resistant as possible, the Director of Community and Children's Services replied that paper would be submitted to the Chairman and Deputy Chairman of the Grand Committee under urgency, and would balance the need for fire resistance doors with the safety of vulnerable residents when they were using the doors.
- In response to a question from a Member, the Director of Community and Children's Services confirmed that the advice to residents in the event of a fire was to stay put until the London Fire Brigade arrived.
- In response to a comment from a Member over the level of rubbish in the hallways of the Barbican Estate and the fire hazard this presented, the Assistant Director for Barbican and Property Services replied that this rubbish was collected daily.

RECEIVED

Golden Lane Estate Residents' Association (GLERA) Letter

Members considered a tabled letter from GLERA regarding fire safety on the estate and the following points were made.

- The Director of Community and Children's Services noted that following recent testing on Great Arthur House, a 300mm strip of combustible material had been removed. No combustible material remained on the City's social housing stock.
- A Member requested that the Sub Committee have sight of the 26 June Q&A document as soon as possible.

Frequency of Meetings

In response to a comment, the Chairman agreed that the Sub Committee review the frequency of its meetings at its September 2017 meeting.

11. 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.

12. **GATEWAY 7 REPORT DRON HOUSE COMMUNITY CENTRE CONVERSION**

Members considered a Gateway 7 Report on the Dron House Community Centre Conversion.

13. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

There were no non-public questions.

14. **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 ended at 4.00 pm

Chairman

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Committee	Dated:
Housing Management and Almshouses Sub- Committee	26 September 2017
Subject: Mais House Decant Programme - Update	Public
Report of: Director of Community and Children's Services	For Information
Report author: Paul Jackson – Department of Community and Children's Services	

Summary

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. It was agreed to bring regular progress reports to the Housing Management and Almshouses Sub- committee. This report sets out rehousing activity between July and August 2017 and the current status. There were 52 occupied flats at Mais House at the start of the decant programme. Since the last report a further 8 units have been vacated. The current number of occupied units is 14.

Recommendation

Members are asked to:

- note the report.

Main Report

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. In January 2016, your Committee received a report identifying a number of issues with Mais House, including a sizable works requirement to bring the scheme up to standard, low demand and 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.
2. A majority of residents 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. Most of this group of residents have now been

rehoused. Other residents wish to be rehoused in areas in which the City does not have any social rented housing. This will be more difficult to deliver and finding suitable rehousing in these areas will be entirely dependent on the cooperation of other housing providers in the social rented and charitable sector. It may not prove possible to meet all of the wishes and area preferences of remaining residents although officers will ensure that any offers of rehousing do meet all the identified housing needs of residents.

3. Officers are working closely with the LB Lewisham (the planning authority for the proposed redevelopment of the Mais House site) to try to meet the requirements some of these residents and have also succeeded in rehousing some residents with a housing association and another local authority. Officers are also maintaining links 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 are continuing to assist residents who have registered an interest in being rehoused at the scheme.
4. It is possible that a small number of residents currently receiving care provision from the local authority may require extra-care accommodation to take into account longer-term requirements in the future. In these instance officers will liaise with the adult social care service of LB Lewisham and any family members to ensure appropriate arrangements.

Current Position – rehousing activity in this period and cumulative totals

5. There are 62 units at Mais house. Twenty-two were occupied at the end of the last reporting period (June 2017). Since then 8 more properties have been vacated. A summary of the total number of vacated units and occupancy levels at end of August 2017 is shown in the table below.

Occupied units at start of programme - May 2016	Total number of vacated units at the end of August 2017	Occupied units at the end of August 2017
52	38	14

6. Rehousing activity has proceeded more quickly than expected up to this point in the programme. 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.
7. As noted above most residents wishing to stay in City properties have now been accommodated, and officers will need to try to find homes through other landlords for the other residents. The rate of movement to date is not therefore expected to be sustained and is expected to slow through the remainder of 2017.

Recommendation

8. Members are recommended to note the report

Corporate & Strategic Implications

9. 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.*

10. 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.

Appendices

None.

Background Papers

None

Paul Jackson

Programme Manager

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Committee Housing Management & Almshouses Sub-Committee	Dated: 26 09 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. This report is presented to alternate meetings of the Housing Management and Almshouses 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**

Officers have recently advertised in local press and City of London housing estates in order to ensure there is a reasonable waiting list for the Almshouses. Prospective Licence holders replying to the advert have been interviewed and reassessed for suitability. Due to unexpected moves off the estate, we currently have two void properties. Officers will make every effort to fill these as soon as possible, to maintain the income from maintenance fees.

3. **Social activities**

Residents had a special picnic day held last month where the Almshouses Manager had created old fashioned games such as Tombola, Coconut shy, Hook the fish, Jenga and Croquet. The Manager also made a giant scrabble board, and residents enjoyed a game testing their word knowledge against staff. The weather held fair, without being too hot so residents were able to enjoy being

outdoors in the garden. A buffet lunch was provided made by the Almshouses Manager and the Sheltered Housing Officer, consisting of healthy options as well as a sweet treat or two. Many residents attended the event with family guests and children; the event was enjoyed by all.

Residents wished to visit Windsor this year instead of the previous seaside trips; this was arranged for 30 August. There were ten attendees as well as some guests to; all had an enjoyable trip and day out.

4. Weekly Maintenance Charge arrears

One resident is persistently in high arrears with maintenance payments. Officers are working with this resident to support a consistent repayment plan.

5. Refurbishment Programme

Officers and the Major Works Delivery Team have been working closely to prepare the refurbishment plans for the estate agreed for this current financial year.

A full asbestos survey and testing has been undertaken in preparation for the works, as well as CCTV drain inspection. The drain inspection highlighted several issues which will be addressed within the scope of the refurbishment work.

Officers from the Major Works team visited the estate with architects to review the construction of the windows pending consideration on replacement or refurbishment of current window frames. They established that the main building windows (1–38) could easily accommodate replacement double glazed panes of glass without making the building appearance change. However the remaining windows i.e. numbers 39–44, East Lodge, and the Gresham Almshouses, as they are a different design, will be harder to change without noticeable difference. Officers are seeking guidance from London Borough Lambeth Planning regarding their preferences as these few properties are listed buildings.

A detailed report presented to Members once the work plan and full costs have been finalised.

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Sheltered Housing Manager

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Committee(s)	Dated:
Housing Management & Almshouses Sub-Committee	26/09/2017
Subject: Customer Service Standards Review	Public
Report of: Andrew Carter, Director of Community & Children's Services	For Decision
Report author: Amy Carter, Projects & Improvements Manager Community & Children's Services	

Summary

We recognise that the majority of our residents are satisfied with the service that we offer them; this is evidenced by our very good satisfaction results in 2016.

We have undertaken a review at this juncture to build on the good work already being carried out and to develop a set of Customer Service Standards, to ensure the same high standards of service are being delivered across all estates.

The standards apply to how our services are delivered, rather than alterations to the services delivered.

Recommendation

Members are asked to:

- Approve the implementation of the new Customer Service Standards.

Main Report

Background

1. There is a 'Code of Customer Care' built within our Tenancy Agreement and Handbook. This code sets out the principles of how we will treat our customers, with a particular emphasis on equality.
2. There is a Corporate Customer Service Standard which sets out a number of principles, including response times and meeting waiting times.
3. This review has been undertaken to create a new set of Customer Service Standards that are in line with the corporate standards, and build upon existing good practice.

Current Position

4. There are two key themes that have been addressed through this review:
 - Customer Expectation – we want our residents to feel confident that when they approach us they will be greeted, respected and helped.

- Service culture – this includes taking ownership of queries, maintaining good communications and high staff motivation to achieve good outcomes for residents.
5. The review has yielded five principles and a number of practical considerations. The full Customer Service Standards are listed in Appendix 1.

Options

6. This service review is optional. We are confident that we are meeting our statutory responsibilities and there is no cause for concern.
7. As members will note, the standards are not overly complex. This is for two reasons; firstly, the majority of our residents simply want us to deliver our services in a polite and appropriate way. Furthermore, we want to ensure all staff are trained and confident delivering these standards, before we build upon them in future years.
8. We have consulted with residents and staff on the proposed standards. The overwhelming majority of the responses have been positive. Most pleasingly, 82% of resident responses have indicated they would be willing to engage with us in monitoring the standards via 'mystery shopping' or equivalent.

Proposals

9. Following approval of the standards, there are three further steps involved in this review.
- Customer Service training will be provided for staff, to help them deliver the required level of customer service and support.
 - A 'launch' will be undertaken of the new service standards, with associated print material publicising the standards to residents.
 - A suite of monitoring will commence, which will include residents undertaking mystery shopping, and managers checking staff are delivering the standards – this will be done through 1-2-1 supervision meetings and the annual appraisal process. Furthermore, complaints received in the department will be monitored to assess whether any constitute a failure of the Customer Service Standards.

Corporate & Strategic Implications

10. This service review forms a key part of our Departmental Business Plan, contributing to one strategic priority:
'Homes and communities: We are developing strong neighbourhoods and ensuring people have a decent place to live.'
11. The review also forms part of the Housing & Neighbourhoods Service Plan:
'Housing Strategy Priority 2 – Making Better Use of Existing Homes: Develop and implement new Customer Care standards and protocols, to ensure a consistent, high quality experience for our residents and customers whenever they come into contact with us.'

Implications

12. Risk Implications: The overall project is been assessed at 'Green' for risk. Some detail explaining the opportunities and threats which have informed this assessment are outlined below.

Service Standards

Opportunity: Customers knowing what they can expect from us creates a sense of trust, and leads to a reduction in complaints, aggressive challenge and Freedom of Information (FOI) requests.

Threat: Customers may have higher expectations of service than we may provide at public service cost thresholds. Staff may feel the standards are restrictive or that they are too low-level.

Training for Staff

Opportunity: Staff are equipped with the knowledge and motivation to deliver better service.

Threat: Potential disillusion on the part of staff, for example those who are already performing well or those who do not adapt well to change.

Launch and monitoring of the service standards

Opportunity: Customer engagement with us, in recognition of the positive work and potential for a better relationship in future.

Threat: Some customers might use the standards as a way to raise historical matters or attempt to complain about staff behaviour in the past.

13. Financial implications: At this point, costs are not anticipated to be significant.

Many of the changes will be cost neutral, and where cost will be incurred, it will be carefully assessed first.

14. We anticipate that training costs will be in the region of £3,000 (included within existing 2017/18 training budget). Refresher training may be required, and circa £1000 within the future annual training budgets will be ring-fenced for this potential future requirement.

15. The launch of standards (including print costs) is anticipated to be £500.

Conclusion

16. In conclusion, this service review has been undertaken to consolidate the standards of service we provide to our residents. The outcome is intended to ensure a consistent approach across all of our services.

Appendices

Appendix 1: Customer Service Standards

Appendix 2: Equality Analysis

Amy Carter

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Appendix 1

City of London Housing Service: Customer Service Standards

The 5 Principles

Meet & Greet

We will greet you warmly, whether in our offices, on the phone or out and about.

How can we help you?

We will always remain open to receive and consider your questions and requests.

Providing the answer

We will always be polite and clear, and ensure you understand the reasons why we can or cannot do something.

When you ask a question or make a request, we will provide the answer or service to you, if we are able to.

If we are not able to provide the answer or service at that time, we will tell you when we will be able to provide the answer or service,

If it is not possible to provide the answer or service, we will let you know why.

Taking Ownership

We recognise that it doesn't matter to you what department is responsible for what. We commit to take ownership of issues and see them through. On occasion, we may need to refer you on to another team, but we will always do so with a clear explanation.

Saying Sorry

We will say sorry when we get things wrong.

We will learn from mistakes so we do not make them again.

Practical Matters

Phone

We will answer the phone within 5 rings or 20 seconds (if we are at our desks).

We will answer with
Good Morning/Good Afternoon.
Our team/department name.
Our full name.

We will ensure our voicemail messages are up-to-date.

If we are away from work, our individual voicemail messages will say when we will be back, and provide the contact details of someone else who may be able to assist in our absence.

If the office is closed, the office phone voicemail message will clearly state the hours of opening and what to do if you need to contact someone urgently.

We will respond to voicemails within 2 working days (if we are in the office).

Email

We will acknowledge emails within 2 working days and provide a response within 10 working days (if we are in the office). If the enquiry is complex, we will provide you with updates until it is resolved.

We will ensure our email out-of-office messages are up to date. If we are away from work, our out-of-office message will say when we will be back, and provide the contact details of someone else who may be able to assist in our absence.

Letters

We will acknowledge letters within 2 working days and provide a response within 10 working days (if we are in the office). If the enquiry is complex, we will provide you with updates until it is resolved.

Visits

We will greet visitors within 2 minutes of their arrival at our offices. Where an appointment is pre-arranged, we will aim to meet you as soon as possible, within 10 minutes of the pre-arranged time. We will inform you if there is any reason for a delay.

EQUALITY ANALYSIS (EA) TEMPLATE

Decision

Customer Service Standard Review

Date

May 2017

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: Amy Carter, Projects & Improvements Manager

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

1. What is the Proposal?

The proposal is to review the Customer Service Standards within the Housing & Neighbourhoods department. The review encompasses the behavioural aspects of customer service as well as tangible standards which we will measure against.

The review is in its early stage. This EA applies to the service review as a whole. We may carry out further EAs where it is identified that individual aspects of the service review may have a wider-reaching implication than is currently anticipated.

2. What are the recommendations?

The review outcomes are expected to be:

- A revised set of customer service standards which have been researched and consulted upon.
- A suite of training for staff to help them deliver the required level of customer service and support.
- A launch of the new service standards, with associated print material.

The review outcomes will apply equally to all our customers, the purpose of this EA is to ensure we have mapped out any potential impacts on the equality aims.

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

Those affected by the review will be all who engage with the Housing & Neighbourhoods department, including residents, service users and those making applications to us. They will be referred to as customers throughout this EA, unless a specific example affects a certain group.

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

[Check box if NOT applicable](#)

[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*

We do not currently have full Equalities Data regarding our residents; in our 'data refresh' project in 2017/18 this will be updated.

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 service review applies to our customers, the group impacted by this review will therefore usually be older than 18, as those under 18 may only rent a property with support. However, we recognise that the households we provide services to frequently contain children under 18.

The intention of the staff training/behavioural aspect of the review is to encourage our staff to treat all those they encounter as individuals and to tailor the service they offer as appropriate.

The outcomes of the review are expected to foster good relations.

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

[Check box if NOT applicable](#)

[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*

We do not currently have full Equalities Data regarding our residents; in our 'data refresh' project in 2017/18 this will be updated.

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 service review applies to our customers, and we recognise that this will include those who have disabilities.

The intention of the staff training/behavioural aspect of the review is to encourage our staff to treat all those they encounter as individuals and to tailor the service they offer as appropriate.

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

The outcomes of the review are expected to foster good relations.

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.*

We do not currently have full Equalities Data regarding our residents; in our 'data refresh' project in 2017/18 this will be updated.

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 service review applies to our customers, and we recognise that this will include those who are pregnant or parents.

The intention of the staff training/behavioural aspect of the review is to encourage our staff to treat all those they encounter as individuals and to tailor the service they offer as appropriate.

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

The outcomes of the review are expected to foster good relations.

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*

We do not currently have full Equalities Data regarding our residents; in our 'data refresh' project in 2017/18 this will be updated.

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 service review applies to our customers, and we recognise that this will include those of all races.

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

The outcomes of the review are expected to foster good relations.

Race

The intention of the staff training/behavioural aspect of the review is to encourage our staff to treat all those they encounter as individuals and to tailor the service they offer as appropriate.

Religion or Belief [Double click here to add impact / Hide](#)

Check box if NOT applicable

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](#)

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](#)

Religion or Belief

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

We do not currently have full Equalities Data regarding our residents; in our ‘data refresh’ project in 2017/18 this will be updated.

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 service review applies to our customers, and we recognise that this will include those of any religion or belief, or none.

The intention of the staff training/behavioural aspect of the review is to encourage our staff to treat all those they encounter as individuals and to tailor the service they offer as appropriate.

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

The outcomes of the review are expected to foster good relations.

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](#)

Sex

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

We do not currently have full Equalities Data regarding our residents; in our ‘data refresh’ project in 2017/18 this will be updated.

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 service review applies to all our customers, and we recognise that this will include those of any sex.

The intention of the staff training/behavioural aspect of the review is to encourage our staff to treat all those they encounter as individuals and to tailor the service they offer as appropriate.

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

The outcomes of the review are expected to foster good relations.

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

We do not currently have full Equalities Data regarding our residents; in our ‘data refresh’ project in 2017/18 this will be updated.

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*

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

Sexual Orientation and Gender Reassignment

group more than the general population, including **indirect impact**

The service review applies to all our customers, and we recognise that this will include those of any sexual orientation or those undertaking gender reassignment.

The intention of the staff training/behavioural aspect of the review is to encourage our staff to treat all those they encounter as individuals and to tailor the service they offer as appropriate.

The outcomes of the review are expected to foster good relations.

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*

We do not currently have full Equalities Data regarding our residents; in our ‘data refresh’ project in 2017/18 this will be updated.

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 service review applies to all our customers and we recognise that this will include those who are married or in a civil partnership, or not.

The intention of the staff training/behavioural aspect of the review is to encourage our staff to treat all those they encounter as individuals and to tailor the service they offer as appropriate.

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

The outcomes of the review are expected to foster good relations.

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

[Check box if NOT applicable](#)

[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)

We do not currently have full Equalities Data regarding our residents; in our ‘data refresh’ project in 2017/18 this will be updated.

Additional Impacts on Advancing Equality & Fostering Good Relations

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

The additional benefits of this service review will be the provision of a clear statement of our standards which will better enable our customers to know what to expect from us and be more able to let us know if there is a breach of these standards.

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 outcomes of the review are expected to foster good relations.

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 project is inclusive and supportive and will encourage our staff to treat residents as individuals. We are confident this supports the Equality Aims.

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:

Committee	Dated:
Housing Management and Almshouses Sub-Committee	26 September 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.

A full public consultation has been carried out on the proposed scheme. Officers have suggested several changes in response to the feedback received from partners and the public. Members are asked to review the amended scheme and recommend it for onward approval by the Community and Children's Services Committee.

Recommendations

Members are asked to:

- review the feedback received during the consultation and the suggested changes to the Allocations Scheme 2017.
- recommend the amended Allocations Scheme 2017 for onward approval by the Community and Children's Services Committee.

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. The proposed City of London Housing Allocations Scheme 2017 is intended to provide 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.
5. A thirteen week public consultation on the proposed Allocations Scheme was held over the summer. Booklets were provided to City Corporation community libraries and Estate Offices, letters were sent to every applicant on the Housing Register, officers spoke at Residents Meetings and articles were placed in City Resident, City Matters and the Housing Newsletter.

Consultation Feedback

6. Feedback was received from 116 members of the public and 18 partner organisations, such as housing associations or neighbouring local authorities.
7. The consultation took the form of seven multiple choice questions about the most significant proposed changes. Respondents were also given an opportunity to explain their answers, comment on any of the more minor changes or make further suggestions. A full report on the consultation results can be found in Appendix B.

Issue One – Lowering the Savings Threshold

8. The City Corporation currently operates a savings test when assessing whether new applicants qualify to go on the waiting list. To qualify, a household must have savings of less than £30,000. In order to target scarce social homes at those most in need, the proposed Allocations Scheme included a lower savings threshold of £16,000.
9. This proposal received a mixed response from the public, with 44 per cent favouring the proposed £16,000 threshold or a lower one and 42 per cent favouring the current £30,000 threshold or a higher one. All of the comments received on this issue were opposed and many made reference to difficulties a household with only £16,000 in savings would face attempting to find a permanent home in the London market.

10. An impact assessment has also been carried out on the proposed change. This found that only around 2.5 per cent of the waiting list, or 2 cases in a random sample of eighty-one, would be affected by the change. Of the two cases identified, one also had an income above the current threshold and has now been closed. The other household contained several dependents, had a low income and had accrued savings over a long working life. It was not the aim of the proposal to exclude households such as this from the Housing Register.
11. The consultation responses also highlighted a possible adverse impact on two groups protected under the Equalities Act 2010. Responses received from older people and from people with disabilities or long-term health conditions favoured a higher savings cap. This is perhaps due to having had a longer time in which to save or in anticipation of higher future living expenses.
12. In response to the feedback received during the consultation and the evidence gathered in the impact assessment, it is recommended that this proposal is amended and the scheme continues the current savings threshold of £30,000.

Issue Two – Defining Low Income

13. The City Corporation currently offers some preference to new applicants who work within the Square Mile and are on a lower income. Currently low income is defined as a gross household income of £26,000 per year. The proposed Allocations Scheme would link 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.
14. This proposal received a mixed response from the public and 36 per cent agreed £29,640 was an appropriate definition of a low income household. While the proposed definition does not enjoy a high level of support, it may not be possible to achieve consensus on this issue; 32 per cent of the public would favour a higher definition and 30 would favour a lower one. It is therefore recommended that the proposed definition of low income at £29,640 per year is retained.

Issue Three – 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.
17. This proposal was positively received by the public with 57 per cent agreeing and 26 per cent disagreeing. It is recommended that this proposal is retained.

18. In response to a suggestion from a member of the public, a clause has also been inserted (in Appendix A, 6.2.D) to treat those providing regular unpaid care to City residents or tenants on an equal basis as those in paid employment in the City.

Issue Four - Increasing the priority of the Studio Upgrade group

19. City Corporation tenants, aged over 45, living in a studio and with no housing needs, are currently able to apply for a transfer to a one bedroom flat. This is done to meet some tenants' aspirations for a larger home and to make studios, which are in high demand from the waiting list, available for re-letting.

20. 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.

21. 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.

22. This proposal received a high level of support from the public with 78 per cent in favour and 13 per cent opposed. It is recommended that this proposal is retained.

23. In response to feedback from a member of the public, a suggested clause has also been inserted (in Appendix A, 6.18) to define a child as a person under 18 or a person under 25 who is in full time education or who has special educational needs.

Issue Five - A Points System

24. 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.

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

26. This proposal was positively received by the public with 62 per cent agreeing and 20 per cent disagreeing. It is recommended that this proposal is retained.

Issue Six – Introducing extra priority for Mixed Sibling Sharing

27. 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.

28. This proposal received a very high level of support from the public with 85 per cent in favour and 10 per cent opposed. It is recommended that this proposal is retained.

Issue Seven – Reducing the priority of applicants who act in bad faith

29. 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.

30. 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. Recently there have been two linked cases of this nature which have attracted the concern of tenants. The proposed policy is intended to discourage this kind of behaviour and to be fair to those applicants who genuinely need help to find suitable accommodation.

31. This proposal received a very high level of support from the public with 87 per cent in favour and 6 per cent opposed. It is recommended that this proposal is retained.

Other changes

32. A number of other minor changes have been made to the proposed scheme in response to public feedback. These include clauses to enable lettings involving vulnerable people to be handled sensitively, to adapt the bedroom standard in cases with exceptionally small rooms and to introduce a local connection rule for Older People's Housing.

Proposal

33. It is proposed that the Housing Allocations Scheme 2017, presented with the above suggested changes in Appendix A, is adopted. As such Members are asked to recommend the scheme for onward approval by the Community and Children's Services Committee.

Strategic Implications

34. The proposed Allocations Scheme supports three priorities in the Department of Community & Children's Service Business Plan These are:

- Safe - People of all ages live in safe communities, our homes are safe and well maintained and our estates are protected from harm
- Independence, involvement and choice - People of all ages can live independently, play a role in their communities and exercise choice over their services
- Health and wellbeing - People of all ages enjoy good health and wellbeing

Financial Implications

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

Legal Implications

36. An independent review of the Housing Allocations Scheme 2017 was provided by TLT LLP. The proposed scheme was amended in accordance with their advice prior to the public consultation.

37. Comptroller's have been consulted and had no additional comments.

Equalities Implications

38. 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

39. 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 – Consultation Report
- Appendix C – Equalities Impact Assessment

Background Papers

- Housing Allocations Scheme 2017 (Housing Management and Almshouses Sub-Committee 16 May 2017)

Adam Johnstone

Strategy Officer – Housing and Adult Social Care

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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. For further information on any of these schemes, interested tenants should contact the Housing Needs Team.

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)	✓	✓
The applicant (and their partner, if part of the household) must have an annual combined income (excluding benefits and before tax) of less than £60,000	✓	
The applicant (and their partner, if part of the household) must have savings or capital of less than £30,000 (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 or a member of their household. 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 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 currently provide unpaid care for a City of London resident, tenant or a member of their household, 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. Proof will be required in the form of an award of Carer's Allowance or a carer's assessment from Adult Social Care.
- e) Sons and daughters of current City Corporation tenants who are entitled to preference under 6.5 and who are also employed at any location to work at least 16 hours per week and have done so for at least 24 months.
- f) People who neither live nor work within the Square Mile, but who can demonstrate a need to live in the City of London or on one of its estates whose household earnings are below the threshold identified in section 6.3 would be considered for a discretionary registration. Evidence as to why the household needs to be considered for a

discretionary registration must be submitted in support of the application form and will be reviewed by the Housing Needs Team. Any discretionary registration has to be authorised by the Assistant Director of Housing & Neighbourhoods.

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. It includes only the income earned by two joint applicants or a sole applicant and their partner.

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.IX 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. However, 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 a two-bedroom property or larger 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).

- 6.18 Child, for the purposes of 6.17(b), 8.11 and 9.45.IV, is defined as a person under 18 years old, or as a person under 25 years old who is in full time education or who has special educational needs.

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 15.5 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 Where a room in a property is extremely small, the City Corporation will depart from the above bedroom standard and instead make an assessment under Part X, Section 326 of the Housing Act 1985 (the space standard).
- 8.10 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.
- 8.11 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 (see 6.18) do not live with them but who visit regularly and who would stay overnight if there was space to do.
- 8.12 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.
- 8.13 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:

- 8.14 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.
- 8.15 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.
- 8.16 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.
- 8.17 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.
- 8.18 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 a two-bedroom property or larger 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), (d), (e) or (f) 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;
- Having refused one Direct Offer, or three offers under Choice Based Lettings, of suitable accommodation from City Corporation.

- 9.32 **Decant Urgency** **(100 or 200 Points)**
 Tenants who do not need to be decanted for at least 12 months will begin with a moderate amount of priority. Priority will be increased by the addition of 100 points for tenants who need to move within 12 months and by 200 points for those who need to move within six months.

Medical and Welfare Priority

Medical Priority

- 9.33 Medical points are awarded if, following advice from an independent medical advisor, the City Corporation considers that an applicant's, or a member of their household's, accommodation is unsuitable because of a medical condition.
- 9.34 Applicants who indicate that they or anyone in their household has an illness or disability which is affected by their current home will be asked to complete a medical self-assessment form and provide up to date documentary proof of their medical needs from qualified medical professionals. This is assessed and given a priority by an independent medical assessor.
- 9.35 Medical priority will be awarded according to the extent to which the health of the relevant household member is affected by their housing conditions and the expected benefits of providing alternative housing. No medical points will be given if there is a medical condition but the current accommodation is suitable.
- 9.36 As part of the assessment for medical 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, medical priority may not be awarded.

- 9.37 A maximum of one award of medical priority will be made per household member. If a person has multiple medical conditions, the relationship between the person's health and their housing should be assessed comprehensively. Additional awards of medical priority will only be made in situations where multiple members of the same household each have medical conditions that are affected by their current accommodation.
- 9.38 Medical priority will 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.VIII).
- 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 (see 6.18) 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 rebranded 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 connection 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
- the letting has been designated as sensitive (see 10.8) and the applicant does not match the required criteria.

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.

Sensitive Lettings

- 10.8 Occasionally a property becomes available for letting which should be let sensitively because of the vulnerability of neighbours. In these cases, bidders may be excluded from the shortlist if they are known to have a history of behaviour that is likely to be detrimental to the wellbeing of the vulnerable neighbour.
- 10.9 Conversely, a neighbour of a property being let may have a history of behaviour which may mean it is necessary to avoid letting the property to a person who is vulnerable. In these circumstances, vulnerable bidders may also be excluded from the shortlist.

Choice Based Lettings Refusal Policy

- 10.10 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.
- 10.11 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.
- 10.12 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.
- 10.13 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).
- 10.14 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

- 10.15 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.
- 10.16 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

- 10.17 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.
- 10.18 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

- 10.19 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.
- 10.20 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.
- 10.21 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.
- 10.22 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.
- Decants**
- IV. One direct offer may be made where a tenant subject to a decant has been unable to secure alternative accommodation via choice based lettings and where vacant possession of their current home is urgently required.
- 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:
- V. **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.

VI. 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.

VII. 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.VIII.

VIII. 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.

IX. Tied accommodation

Retiring City of London Corporation employees 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.

X. 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.

XI. 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 10.10 – 10.14) 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 10.12 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 10.11.
- 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 or a licence agreement 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)
 - Applicants must complete a face-to-face assessment to ensure the low level of support provided in sheltered accommodation is appropriate for their needs
 - Applicants should normally be able to demonstrate a local connection to Greater London either through:
 - (i) current residence or substantial past residence
 - (ii) current and substantial family connections
 - (iii) substantial past employment
 - (iv) current and substantial cultural or community connections
- 13.4 Housing association homes to which the City Corporation has nomination rights may have additional local connection requirements.
- 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 15.5.

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.
- 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
 - enable existing local residents to share in the benefits of any estate infill or regeneration schemes.
- 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

15.6 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

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

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Allocations Scheme 2017

Consultation Review

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1. Consultation Methodology

The consultation took the form a survey with multiple choice questions about the 7 most significant changes in the proposed Allocations Scheme 2017.

An eighth question was a free text box for respondents to explain their answers, comment on any of the more minor changes or make further suggestions.

The consultation was open for thirteen weeks from 22 May to 18 August 2017

It was promoted through City Resident, the Residents Newsletter, City Matters, the Buzz from the Top internal newsletter, the City Corporation website, the homeconnections website, on local estate Facebook pages and to members of the Housing User Board (HUB).

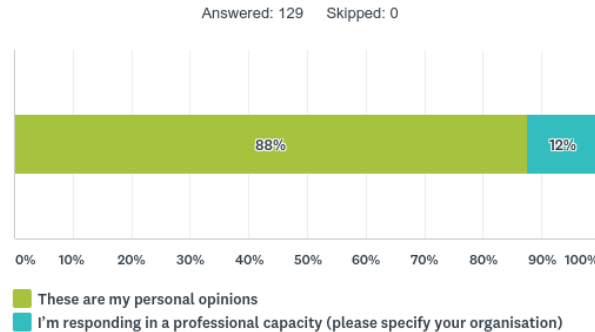
Letters were sent to every household on the waiting list and were included in every tenant's July rent statement. Officers spoke at Residents Open Meetings at Middlesex Street, Avondale Square, Golden Lane and Sydenham Hill, as well as at an event organised and promoted by the Golden Lane Tenants Forum.

Emails, and if necessary follow ups, were sent to relevant local authority, housing association and community partners inviting their comments.

2. Respondents

A total of 134 people responded to the consultation; 129 via the online survey and a further 5 by email or telephone.

Q1 Are your responses to this consultation in a personal or professional capacity?

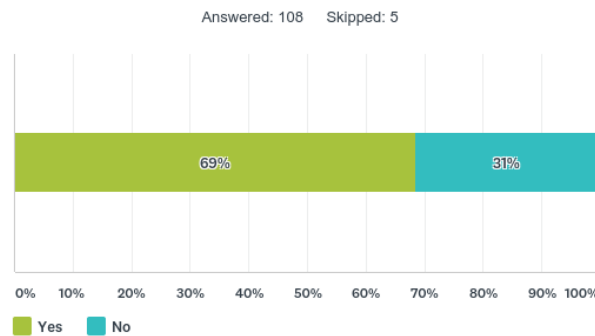


Members of the public made up 88% of respondents and partner organisations made up 12%. The partners to provide a response were:

Peabody	Lambeth Council	East London Housing Partnership
CoLC Equalities Manager	Hanover	CoLC Sheltered Housing Manager
Guinness Partnership	Islington Council	CoLC Projects and Major Works
One Housing	A local authority	UK Youth Parliament, City of London
Lewisham Council	Southwark Council	Hackney Council

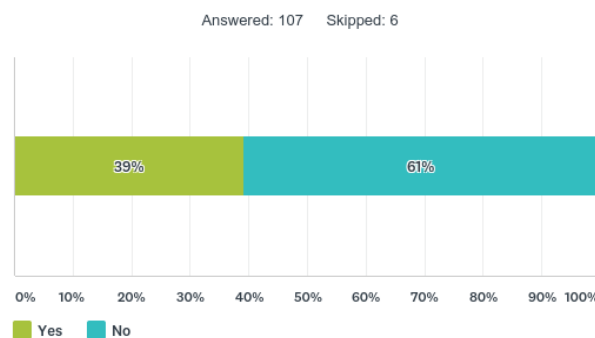
Of those respondents who were members of the public, the majority live within the Square Mile.

Q2 Do you live in the City of London (the Square Mile)?



A sizeable number of responses were from current tenants, although the majority were not.

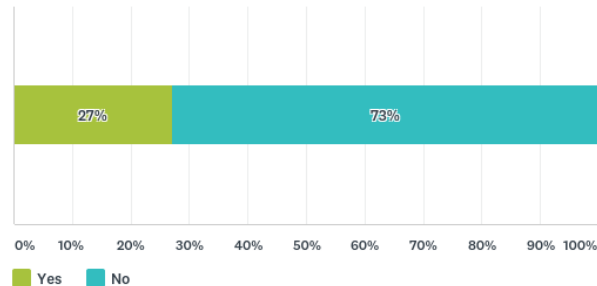
Q3 Are you a tenant of the City Corporation?



Although the consultation reached a reasonable number of people currently on the Housing Register, the majority of respondents were not currently on either the waiting or transfer list.

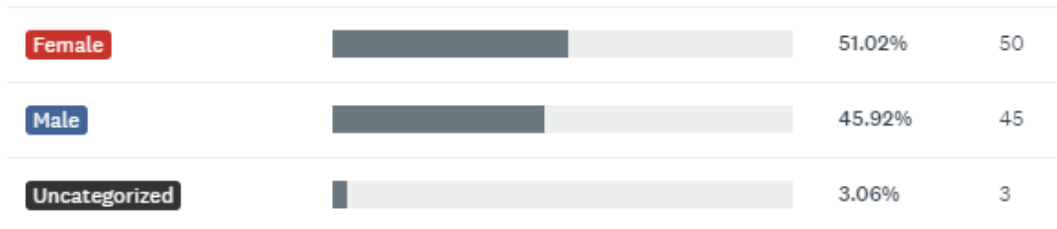
Q4 Are you currently on the City Corporation’s Housing Register (either as a new applicant or as a tenant wanting to transfer)?

Answered: 107 Skipped: 6



Respondents were almost equally split between men and women.

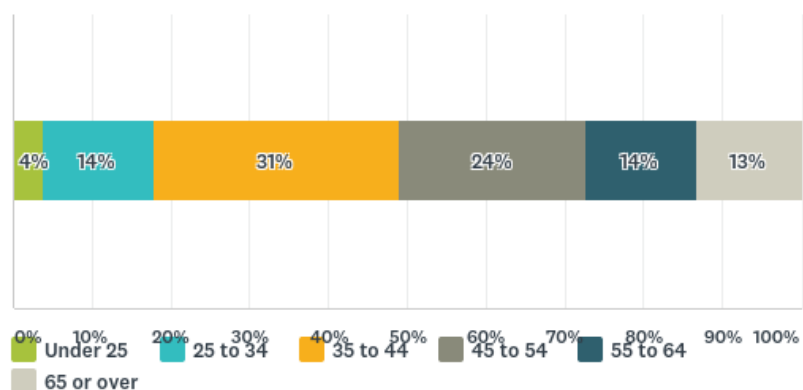
What is your gender?



The consultation reached people of all ages, although younger people and people 65 and over are underrepresented compared to their proportion in the City of London’s population as a whole (figures from the ONS mid-year estimate 2016). The consultation was also aimed at non City residents living on City estates or on the City’s Housing Register and this may account for some of the difference.

Q6 How old were you on your last birthday?

Answered: 106 Skipped: 7

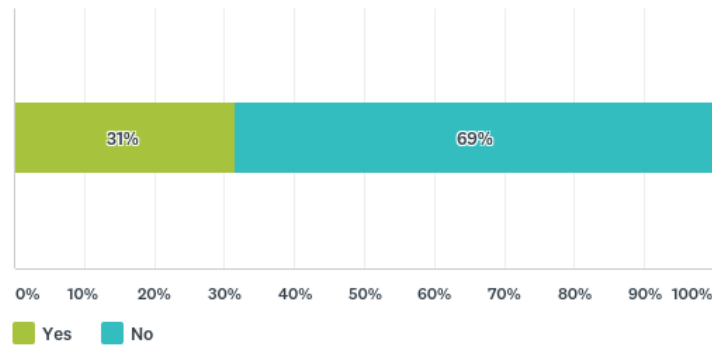


Age Bracket	Survey	City
18 to 25	4%	10%
25 to 34	14%	26%
35 to 44	31%	17%
45 to 54	24%	17%
55 to 65	14%	13%
65 and over	13%	18%

Just under a third of respondents reported having a disability of long term health condition. This is significantly higher than the number of City residents who reported in the 2011 Census that their daily activities were limited either a lot (5%) or a little (8%) by a disability or long term health problem.

Q7 Do you consider yourself to have a disability or long term health condition?

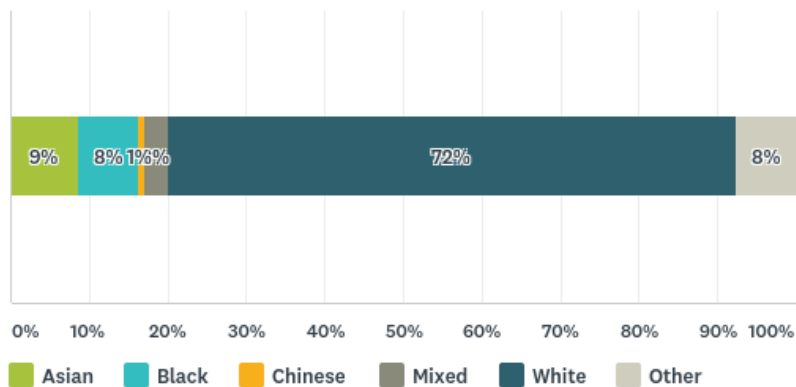
Answered: 105 Skipped: 8



Around three quarters of respondents described themselves as white, while a quarter were from another ethnic group. This is slightly higher than the 2011 Census, which found that 21.4% of City residents identified with a non-white ethnicity. This may be a result of demographic change or a result of responses from waiting list applicants living in other parts of London.

Q8 How would you describe your racial or cultural origin?

Answered: 105 Skipped: 8



3. Savings Cap

What did we ask?

Currently, applicants must have less than £30,000 in savings to be considered for an offer of housing from the City Corporation.

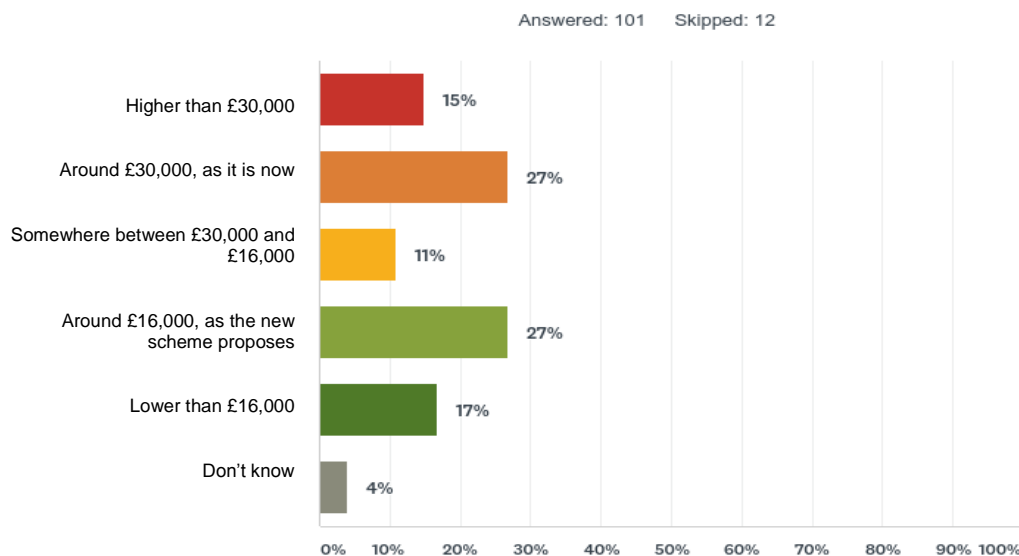
We believe this is enough for someone to rent a home in the private sector and are considering lowering our savings threshold in order to target limited social housing at those most in need.

We have proposed lowering the savings threshold to £16,000. This would be for new applicants only and would not apply to current tenants who want to transfer.

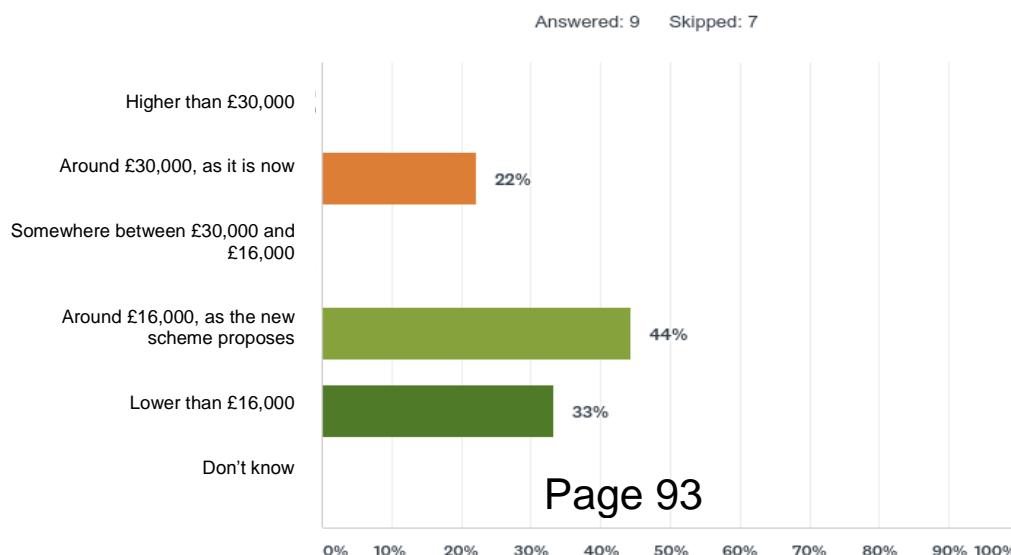
3.1 Survey Data

Reducing the savings cap has been the most contentious change proposed in the Allocations Scheme 2017. Although partners were in favour of a lowered threshold, the public were evenly split between those who favoured the current £30,000 cap or a higher one (42%) and those who favoured the proposed £16,000 cap or a lower one (44%).

Q9 Have Your Say - Where do you think the savings cap should be set? (public)



Q9 Have Your Say - Where do you think the savings cap should be set? (partners)



3.2 Survey Comments

All of the comments received about this proposal were strongly opposed:

“The savings threshold at £30,000 is something I found tricky to judge. Personally I'd love to have that amount of savings and I'd certainly consider it a very healthy bank balance. However, with the current cost of housing, particularly in London, would £30,000 really help someone ineligible for social housing to secure a home outside of the private rental sector? If it's clearly demonstrable that that amount of savings would mean they could secure housing through shared ownership for example, then fine, but if not, they would still, in my opinion, need some reasonable level of priority for social housing.”

City Tenant

“Having been on the list for over a decade, I live in fear of being made ineligible overnight... Without going into detail about our personal situation, social housing is really our only chance of securing secure, long-term accommodation in London. Being wiped from the list would, if not quite send us over the edge, push us further into the cracks. However, in the annual census I have declared savings well below the current threshold. This is an inheritance and is all the money either of us is ever likely to receive. If I'm correct, this is in excess of the new threshold of £16,000. Would it then be the case that I would automatically be struck from the waiting list? I'd like to know where this new figure came from? Should I go on a spending spree? Buy a car? Waste my money in order to remain on the list, rather than be frugal and go without as I have over the past ten years?”

Waiting List Applicant

3.3 Recommendation

Public opinion is evenly split on the proposal to lower the savings threshold and those opposed to the change make some compelling points about the limited options available to a household with only £16,000 in savings.

It is therefore recommended that this aspect of the Allocations Scheme is amended and the current savings threshold of £30,000 is retained.

4. Defining Low Income

What did we ask?

The City Corporation currently offers some preference to new applicants who work within the Square Mile and are on a low income. We currently define a low income as a household income of £26,000 per year, before taxes and benefits.

We propose linking our criteria to the earnings that 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.

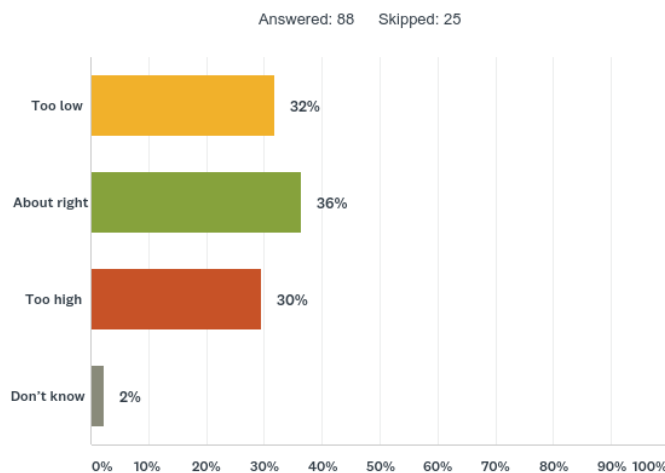
Why not London Living Wage?

As an accredited Living Wage employer, the City Corporation considered linking our criteria to the London Living Wage. In 2017-18, this would be £38,532 per year.

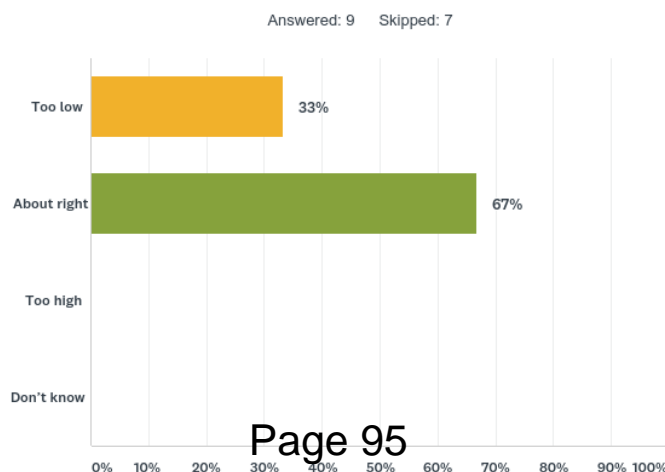
However, raising our criteria this much could mean applicants earning relatively higher incomes may crowd out those on lower incomes most in need of affordable housing. Those earning between £29,640 and £60,000 would still be able to get preference for housing in other ways – for example, if they are overcrowded.

4.1 Survey Data

Q10 Have Your Say - Do you think the proposed definition of low income (£29,640) is: (public)



Q10 Have Your Say - Do you think the proposed definition of low income (£29,640) is: (partners)



4.2 Survey Comments

Public opinion on the correct definition of low income is divided equally between respondents who believe the proposal of £29,640 per household is about right, those who think it is too low and those who think it is too high.

While the proposed definition does not enjoy a high level of support, it may not be possible to achieve consensus on this issue – a change in either direction will likely lose as much support at one end of the spectrum as it gains at the other. Partners were more favourable to our proposal, although a minority thought we were targeting our definition too low.

Comments ranged from those who favoured using London, rather than National, Living Wage to those already earning less than the threshold who did not want to dilute the preference they currently receive:

“I work in the City. I currently live apart from my children as we cannot pay the massive rents asked in the private sector. Some form of priority for low paid City workers with families, but on my wage.”

City Worker

“The suggested definition of low income is too low - you should use the London Living Wage.”

City Tenant

“Correct that this is now automatically increased for inflation.”

City Tenant

3.3 Recommendation

There is sufficient public support to keep this proposal as it is and define a low household income as £29,640 per year or less. This will enable this priority group to remain targeted at those City workers on the lowest incomes and who are therefore most in need of affordable housing.

5. Expanding City Preference

What did we ask?

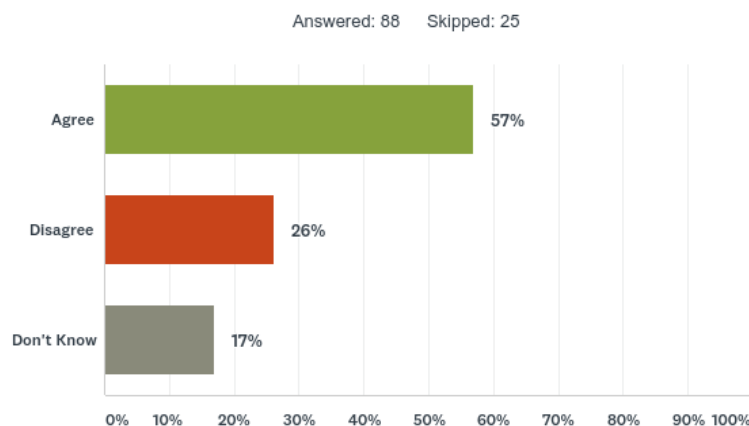
The current Housing Allocations Scheme only offers the 'low income' preference discussed in the last question to people who work in the City of London.

The new scheme proposes offering the same level of priority to people who have a strong connection to the City of London and who also have a household income of less than £29,640. This would open up this part of the waiting list to:

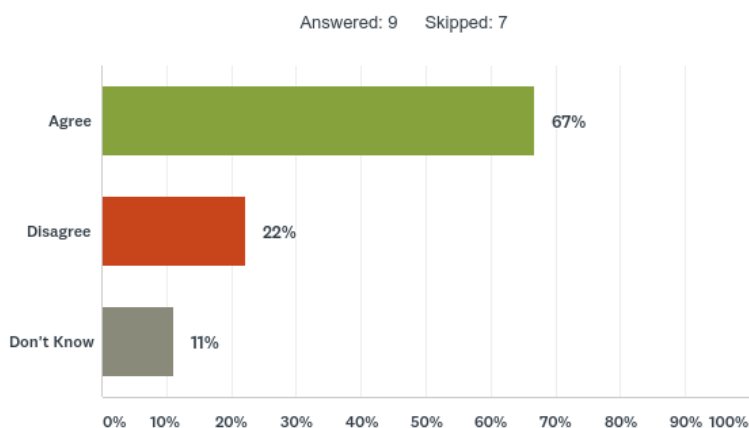
- City residents and sons and daughters of City Corporation tenants who work outside of the Square Mile
- City residents who have recently lost their job
- City residents who are not in paid employment but who experience difficulties paying private rents as a result of recent benefit changes.

5.1 Survey Data

Q11 Have Your Say - Do you agree or disagree with this proposal? (public)



Q11 Have Your Say - Do you agree or disagree with this proposal? (partner)



5.2 Survey Comments

A slim majority of public respondents and a substantial majority of partner responses agreed with this proposal. There appears to be near unanimous support for offering preference to the of the first of the three groups under consideration, 'City residents and sons and daughters of City Corporation tenants who work outside of the Square Mile'. Offering preference to the two out of work groups attracted both positive and negative comments.

"I agree with expanding this category to include residents and sons and daughters who work outside of the City, but disagree with including those out of work and on benefits."

City Tenant

"Agree with residents and sons and daughters working outside the City - not sure about the others."

Transfer List Applicant

"Enabling more low income people to apply for your social housing flats is to be applauded!"

Out of City Tenant

5.3 Recommendation

This proposal was positively received by the public and it is recommended that it is retained.

The scheme has also been amended in response to a suggestion to also offer preference to those providing unpaid care to a City resident or tenant:

"Carers should be given equal priority as a working person."

Waiting List Applicant

6. Studio Upgrade

What did we ask?

The City Corporation currently offers existing tenants who are aged 45 and over, and who live in a studio flat, the chance to bid for a transfer to a one bed.

This is done to meet current tenants' aspirations for a larger home and free up studios for new lettings. Around 50 per cent of people on our Housing Register are waiting for a studio flat, but only 30 per cent of homes available to re-let are studios, leading to longer waiting times.

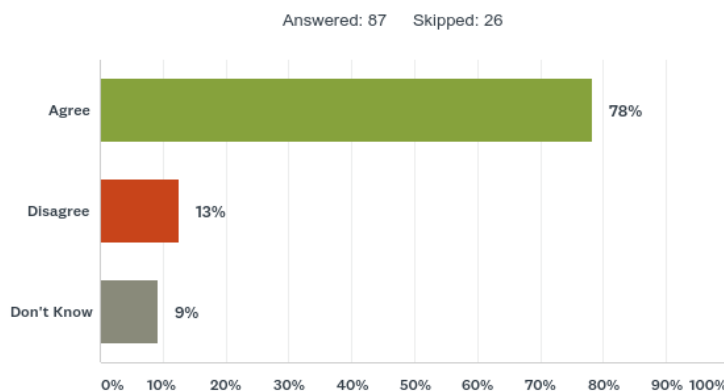
However, because of the current level of priority offered to this group, very few Studio Upgrade transfers take place.

The new scheme proposes increasing the priority given to this group. It would also expand the group from just the over 45s to include couples of any age who share a studio flat, and parents who live in a studio and whose children visit them regularly (or who would do if there was space).

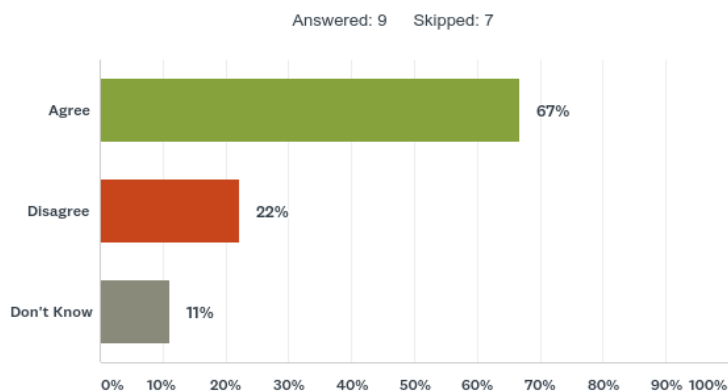
6.1 Survey Data

The studio upgrade proposal received a high level of support from both the public and partners. There was no significant difference in response by age or tenancy status.

Q12 Have Your Say - Do you agree or disagree with this proposal? (public)



Q12 Have Your Say - Do you agree or disagree with this proposal? (partner)



6.2 Survey Comments

All the comments received about the studio upgrade proposal were highly supportive, including from some waiting and transfer list applicants who stand to directly benefit:

“One bedroom flats could be given to people who are in studio/bedsits on the city estates thus opening up some places for the waiting list.”

Waiting List Applicant

“I think it will be a much better idea to release the bedsits and studios to the younger generation. It is very difficult for those of us older ones that live in studio flats to have family members e.g. sons and daughters and grandchildren to stay over.”

Transfer List Applicant

“We particularly like the idea of giving additional priority for 1-beds for those with visiting children.”

Local Authority Partner

6.3 Recommendation

This proposal received a high level of support from partners and the public and should be retained in its current form.

In response to a suggestion from a member of the public, a clause has been added to define a child as a person under 18, or a person under 25 who is in full time education or who has special education needs.

“Agree, but the children should be 18yrs or under, or in full time education or have special needs.”

City Tenant

7. Bands or Points

What did we ask?

The City Corporation needs to choose whether to use a bands system or a points system to decide who will receive an offer of housing. Currently a mix of both is used, which makes the scheme harder to understand.

Bands systems sort applicants into three or four priority bands, who then compete on waiting time. This is straightforward, but by treating many different people in the same way, they can overlook those most in need.

We are proposing moving to a points system. These can be more complex, but try to understand each household's circumstances and offer accommodation to those who need it most.

This is best shown with an example – the Smith family and the Jones family. Both are City Corporation tenants applying for a transfer to a two bedroom home.

The Smith Family live in a two bedroom flat with their child. Their child has severe asthma and struggles with the three flights of stairs up to their flat. They have been on the transfer list for a year.

The Jones Family also live on the third floor and have a child who struggles with the stairs due to a medical condition. However, they only have a one bedroom flat and so are overcrowded. They have been on the transfer list for six months.

Under a **band system** the following priorities could be awarded:

The Smith Family

Moderate Medical (Band 2)

Waiting time: 12 months

The Jones Family

Moderate Medical (Band 2)

Moderate Overcrowding (Band 2)

Waiting time: 6 months

Both families are placed in Band 2 and waiting time is used as a tie-break. As they have been waiting longer, the Smith Family will be made an offer of accommodation first.

Under a **points system** the following priorities could be awarded:

The Smith Family

Moderate Medical (225 points)

Waiting time: 12 months

The Jones Family

Moderate Medical (225 points)

Moderate Overcrowding (25 extra points)

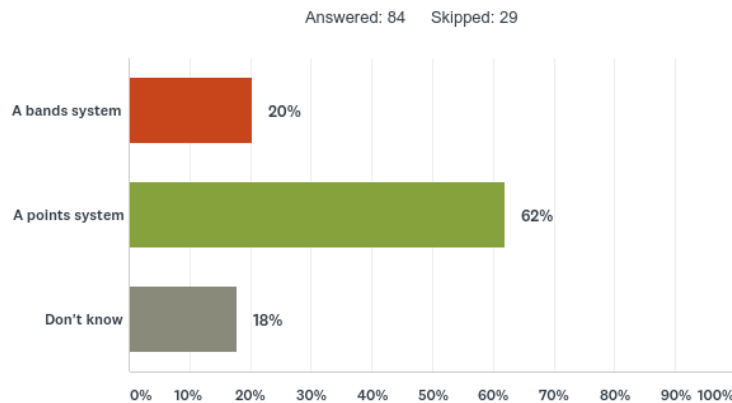
Waiting time: 6 months

Under this system, the Jones family has 250 points, while the Smith family has 225. The Jones' would therefore be made an offer of accommodation first, as their needs are greater.

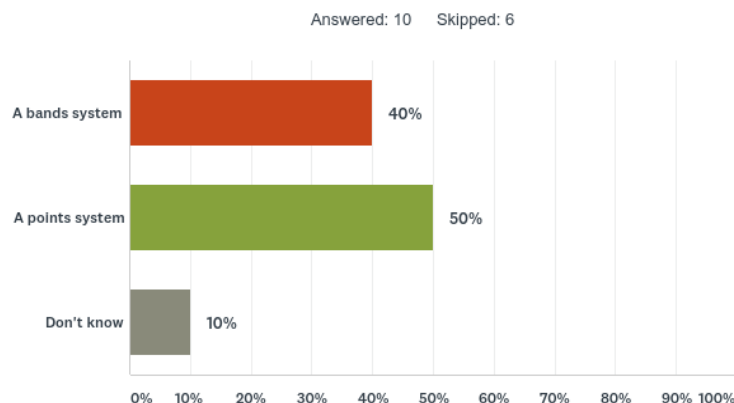
7.1 Survey Data

A large majority of the public support our proposed points system over one based on bands. There was a high level of 'don't know' answers, perhaps due to the more abstract nature of the question. Partners supported a points system, by a much smaller margin – a reflection of the current preference in the sector for simpler bands systems.

Q13 Have Your Say - Which system do you think the City Corporation should use? (public)



Q13 Have Your Say - Which system do you think the City Corporation should use? (partner)



7.2 Survey Comments

The comments received on this point are in line with the quantitative responses; there is public support and partner ambivalence towards the points system:

“Points system will offer more certainty and clarity - I support the move.”
City Tenant

“The proposed changes to the allocations scheme seem fairer and more transparent. The move to a point based system is also one which I think is good.”
Housing Association Partner

“We replaced our points-based system with a band-based system in 2013, and our own experience is that the band-based system is much easier to administer, more transparent and much easier for customers to understand.”
Local Authority Partner

7.3 Recommendation

This proposal received a high level of support from the public and should be retained in its current form.

8. Mixed Sibling Sharing

What did we ask?

The current Housing Allocations Scheme currently treats overcrowding cases the same, regardless of who is sharing a bedroom.

The new scheme proposes offering additional priority to overcrowded households when two siblings of different genders, at least one of whom is age ten or over, are forced to share a bedroom.

The effect of this change can be shown with another example:

The Taylor family lives in a two bedroom flat with their three teenage boys. They are on the list for a transfer to a larger home.

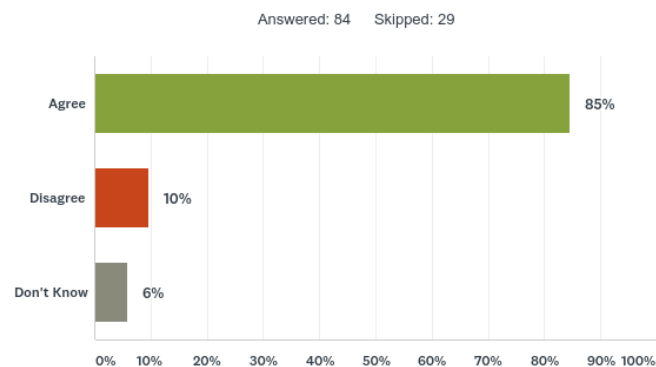
The Williams family also live in a two bedroom flat with their three teenagers and are on the list for a transfer to a larger home. They have one boy and two girls.

Under the current system, both families are treated the same. Whoever has been waiting the longest will be offered accommodation first.

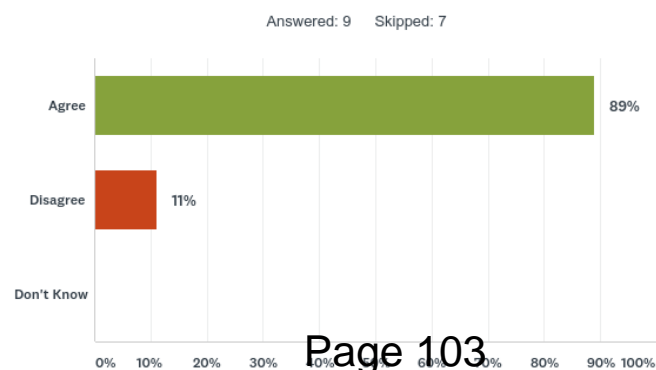
We believe that the psychological effects of overcrowding are worse when siblings of different genders must share a bedroom during puberty. We are proposing offering 10 extra points to families where this is happening. This would mean that the Williams family was offered accommodation first, regardless of who had been waiting the longest.

8.1 Survey Data

Q14 Have Your Say - Do you agree or disagree with this proposal? (public)



Q14 Have Your Say - Do you agree or disagree with this proposal? (partners)



8.2 Survey Comments

The proposal on mixed sibling sharing received very strong support from both the public and partners:

“Strongly agree with the proposals about brothers and sisters sharing a room - I was amazed to find out that this isn't already how it's done.”

City Tenant

“Children of the same sex 12 and over should be given a separate room, but 2 different gender; male and female should be awarded more points.”

Waiting List Applicant

8.3 Recommendation

This proposal received a high level of support from the public and should be retained in its current form.

9. Intentionality

What did we ask?

The current Allocations Scheme reduces the priority given to applicants who have been found 'intentionally homeless'.

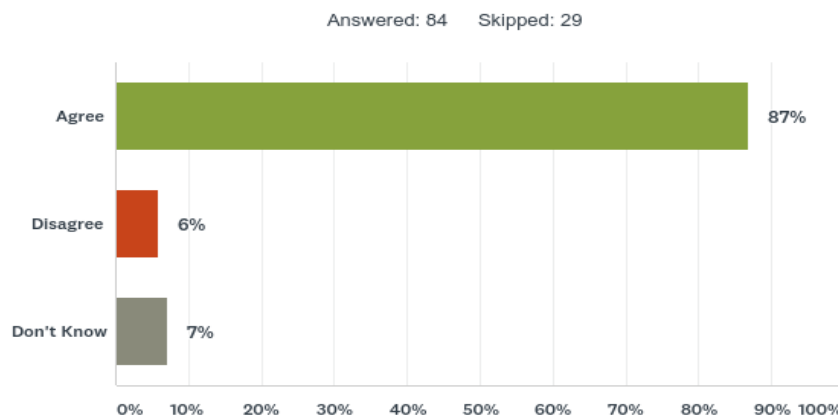
This is a legal term that means someone acted in a way, or failed to do something, that caused them to lose their home. This could be something like anti-social behaviour or not paying rent when they had the money to do so.

The new scheme proposes reducing the priority of applicants whose actions have contributed to their own 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.

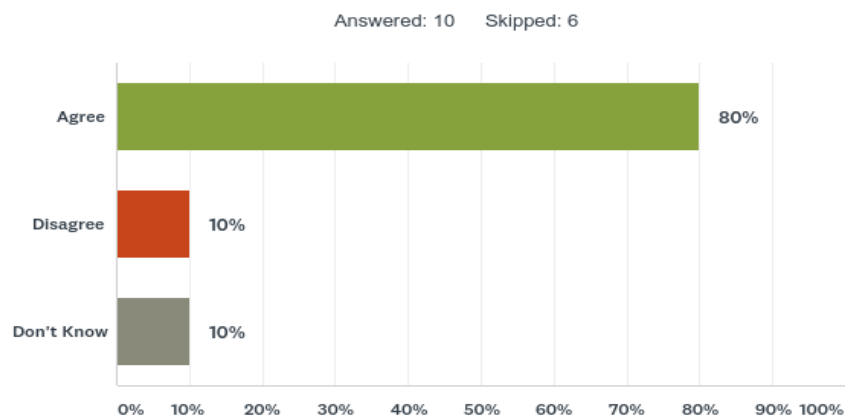
We want to discourage this kind of behaviour as it is unfair to those applicants who genuinely need help to find suitable accommodation.

9.1 Survey Data

Q15 Have Your Say - Do you agree or disagree with this proposal? (public)



Q15 Have Your Say - Do you agree or disagree with this proposal? (partners)



9.2 Survey Comments

This proposal received very strong support from both partners and the public. There was also strong support for the policy in the comments and people felt it was a necessary change to prevent abuse.

Some comments cautioned for an understanding approach to be taken where applicants have mental health issues, fall into rent arrears or have other extenuating circumstances. It is worth reiterating that we would only seek to use this policy in extreme cases. Local authority partners were also strongly supportive and generally said they had similar policies.

“Absolutely agree. A lot of this happens (with little comeuppance) and the people who are good neighbours / in genuine need regularly suffer. This would help alleviate this.”

City Tenant

“Over the years I have witnessed people abusing the system with allocations and it's unfair.”

Waiting List Applicant

“Yes, but mental health conditions should be considered.”

City Worker

“Intentionally worsening circumstances, agreed but we would consider this would to be quite difficult to prove and therefore in practice would apply to only the most obvious cases of abuse.”

Local Authority Partner

9.3 Recommendation

This proposal received a high level of support from the public and could be retained in its current form.

10. Additional Comments

A number of other comments were received on issues other than those covered by the seven main questions. These have all been considered and it is recommended that the scheme is amended in response to the following suggestions:

10.1 Sensitive lettings

“There is no specific mention of mental illness ... those, particularly with moderate or severe mental illness, might be prioritised for property in a block or estate where there is NOT a history of tenant conflict and/or lack of understanding of those who are mentally ill.”

City Resident

A clause (10.8-10.9) has been added to enable us to avoid making a letting if it would put the wellbeing of a vulnerable person at risk in this way.

10.2 Undersized rooms

“I think the size of the bedrooms should be a factor. We are in a 2 bed at the moment our sons room is very small can just about fit a bed and chest of draws in there and we are expecting another baby. Regardless of whether the baby is a girl or a boy it will be very difficult for them both to fit in such a small room. We don't have the option to swap rooms as our sons room is so small our bed won't even fit in there.”

City Tenant

A clause (8.9) has been added to enable us to depart from the Bedroom Standard and instead use the Space Standard when an applicant tells us one or more of their rooms is exceptionally small.

10.3 Direct Offers in decant cases

“I think if we wanted possession because we wanted to demolish a block we could cover this with a direct offer.”

City Corporation Officer

This was an omission and a clause (11.2.IV) has been added to allow for direct offers to be made to tenants who need to be decanted urgently.

10.4 Sheltered housing assessments

“The qualifying criteria neglect to mention our assessment process to make sure sheltered housing is a suitable choice for the applicant.”

City Corporation Officer

This was another omission and the qualifying criteria for Older People's Housing have been amended (13.3) to make reference to the assessment process.

10.5 Local connection for older people's housing

“We should apply a local connection rule to sheltered housing too. Applicants should either be resident in Greater London or have strong family ties here.”

City Corporation Officer

A local connection rule has been added to the qualifying criteria for Older People's Housing (13.3). This has been kept broad and as well as current residence or family connections, allows applicants to establish a local connection based on past residence or employment or current community ties.

10.6 Transparency around lettings

“There has to be a greater transparency as to how homes are allocated. City of London proposed that single applicants that qualify for a studio can put forward their interest for a one bed during the Horace

Jones build. I was never contacted back once I put my interest in. Was a fair process adopted? The allocation seemed ambiguous.”

Waiting List Applicant

Officers are looking into whether more information about who homes are let to can be made public, without breaching the confidentiality of any individual applicant.

10.7 Income thresholds

“Do the income thresholds of £60,000 to qualify and £29,640 apply to just applicants and their partners, or are other family members / adult children included as well?”

City Tenant

Clauses 4.2 and 6.3 have been clarified to ensure these thresholds only apply to applicants and their partners.

10.8 Downsizing from a one bedroom home

“I’m over 45 and live in a one-bed. I’d like to transfer to another one-bed but have been told this isn’t possible, unless I downsize to a studio and then use the Studio Upgrade list to get a one-bed back. Where’s the sense in that?”

Out of City Tenant

Clauses 6.15 and 9.6 have been amended to only award downsizing priority where at least a two bedroom home is being given up. Tenants who wish to move but who have no identified housing need are advised to look for a mutual exchange.

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](#)

Page 1 of 9

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.

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.

3. 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](#)

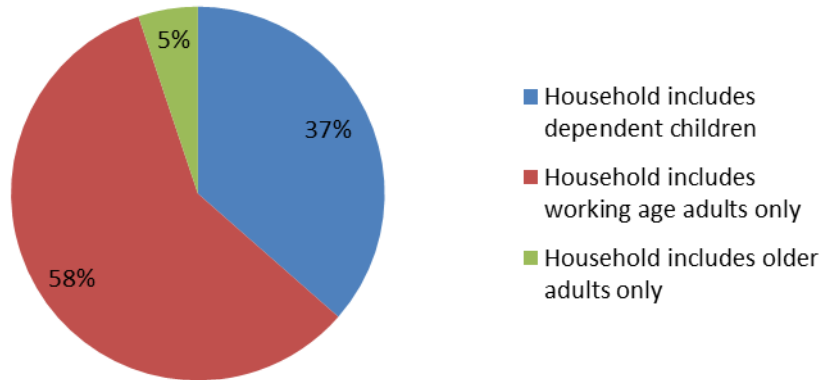
Age

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

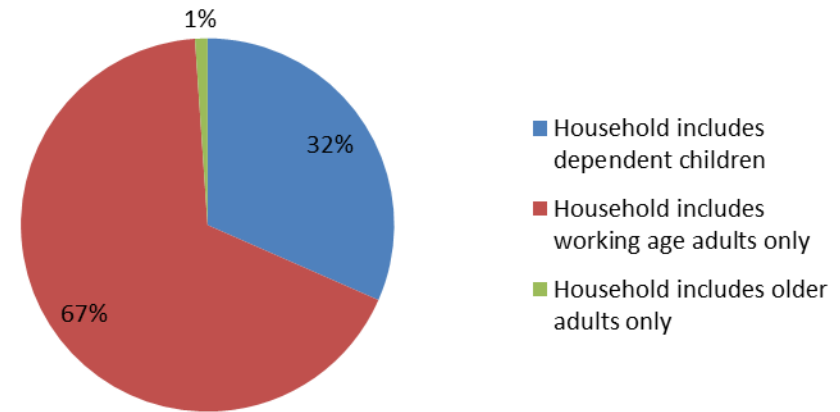
The above borough statistics are of limited use when discussing housing allocations. Of the City's twelve housing estates (the source of all transfer applications), ten are located outside of the Square Mile. Most new applicants on the waiting list qualify by virtue of working in the City, but they generally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

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.

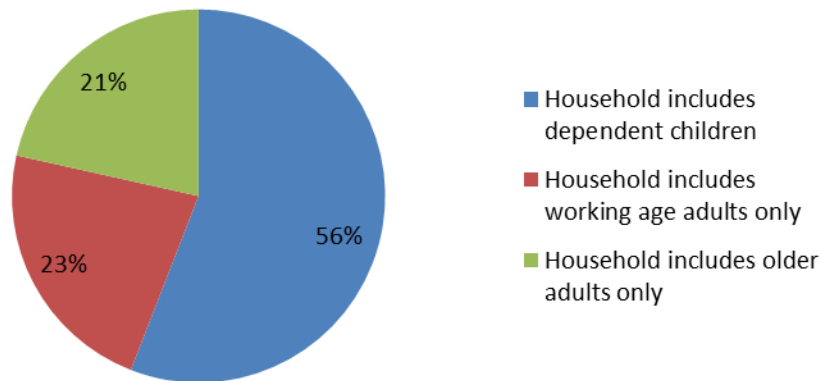
Housing Register by Age



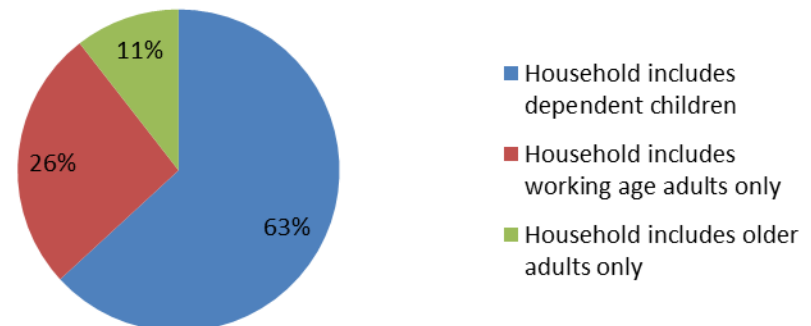
Waiting List by Age



Transfer List by Age



Accepted Homeless Households by Age Profile



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

Age

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.
- 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

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 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

Age

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 band 3 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.

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.

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*

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 rehoused 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 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

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.
- 5) Positive impact.

Disability

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 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.

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:

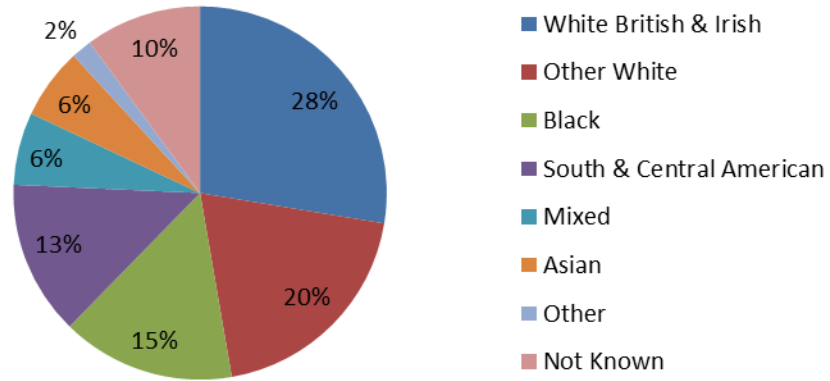
Race

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%

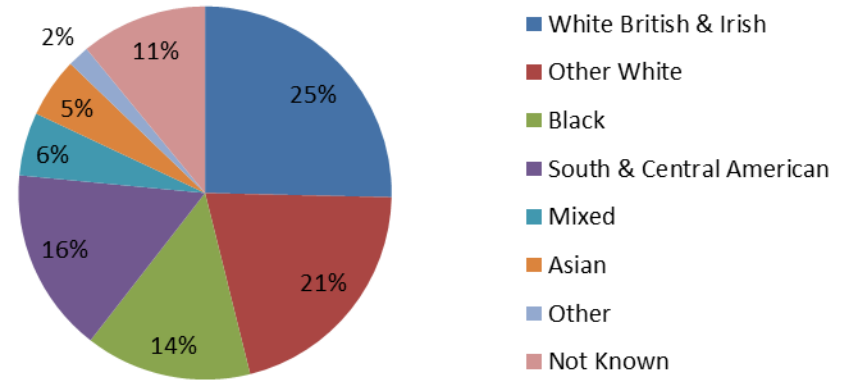
This shows that the picture of overcrowding on the City Corporation's waiting list is in line with national data. Asian, Black and Mixed households are considerably more overcrowded than the average, while White households are considerably less overcrowded.

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).

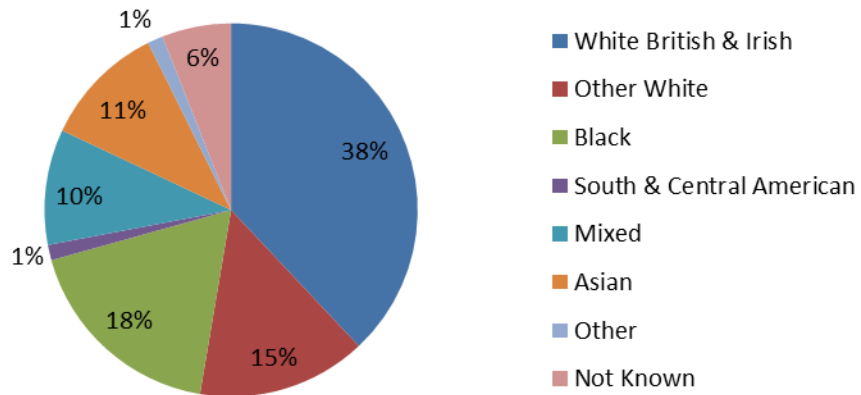
Housing Register by Ethnicity



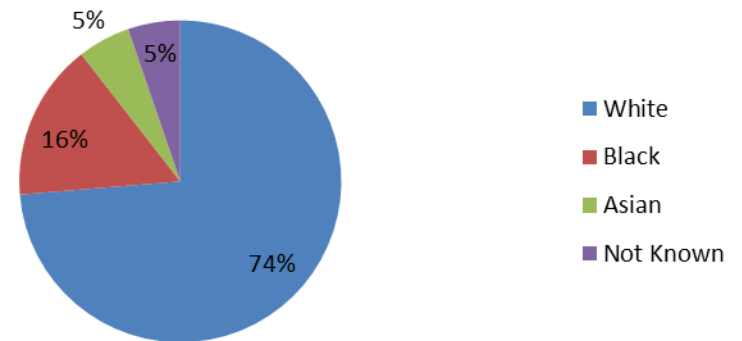
Waiting List by Ethnicity



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

<p>Race</p> <p>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.</p>	<p>enables those who don't understand or engage with CBL to gain housing too.</p> <p>9) Positive impact.</p>
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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

<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](#)

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

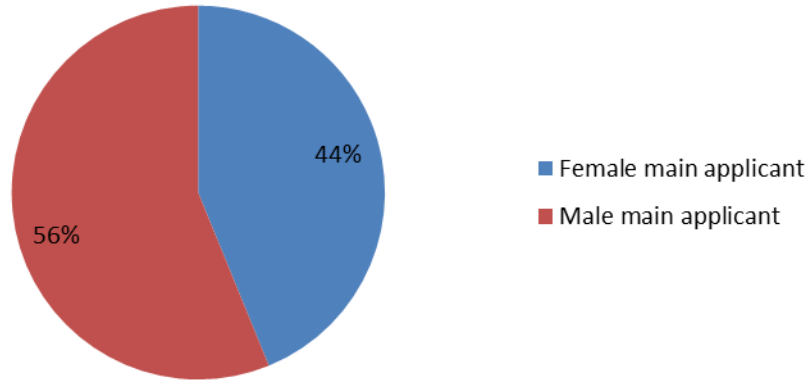
The above borough statistics are of limited use when discussing housing allocations. Of the City's twelve housing estates (the source of all transfer applications), ten are located outside of the Square Mile. Most new applicants on the waiting list qualify by virtue of working in the City, but they generally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

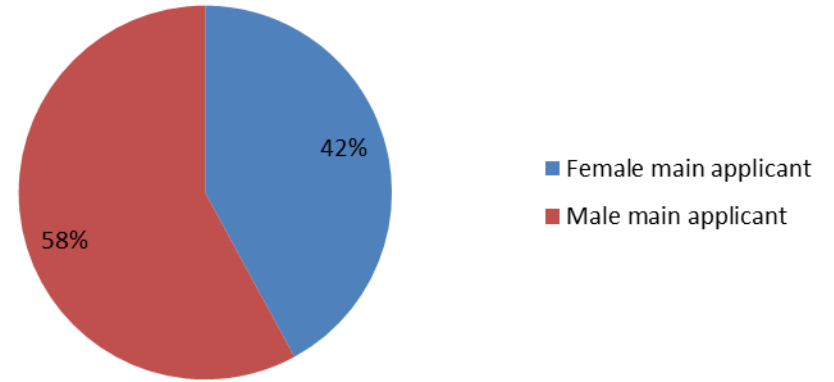
Well over half of applications on the Housing Register and the waiting list are made by a male applicant (who may or may not have a partner). The transfer list is evenly split, and around a quarter of transfer applications are in a male tenant's name. In contrast, well over half of homeless applications 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.

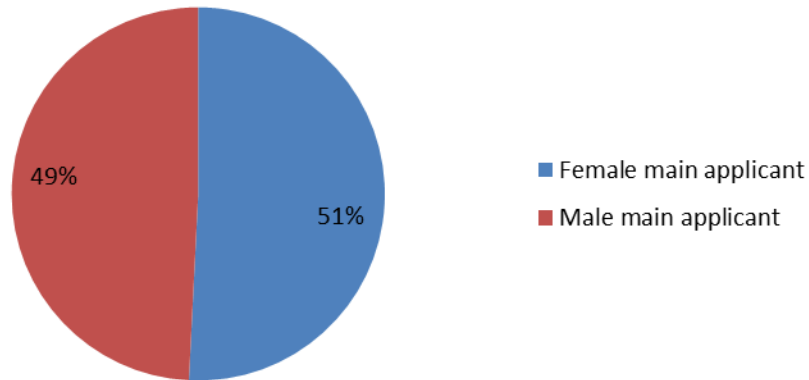
Housing Register by Gender



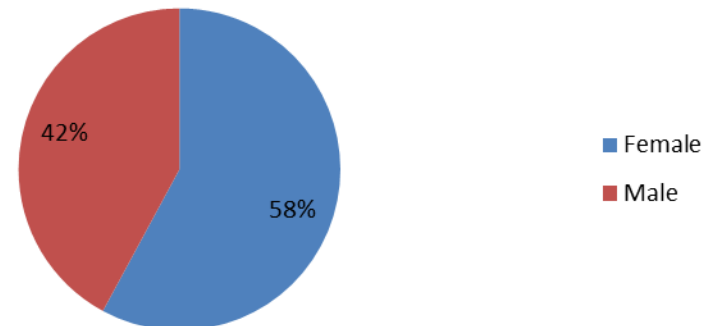
Waiting List by Gender



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 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?

Page 12
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 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.

- Page 28
- 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.

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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Committee(s)	Dated:
Housing Management and Almshouses Sub-Committee	26 September 2017
Subject: Housing Strategy	Public
Report of: Director of Community and Children's Services	For Information
Report author: Adam Johnstone, Strategy Officer	

Summary

This report presents an outline of a proposed new Housing Strategy. This will set out the City of London Corporation's vision for the management of our social housing estates, on how the Corporation will contribute to new housing supply and on how housing will contribute to wider objectives around health and wellbeing, building sustainable communities and supporting vulnerable people.

This report is presented to enable Members to have oversight of the strategy development process and to provide feedback on its proposed outline and scope.

Recommendation(s)

Members are asked to:

- Consider whether the proposed areas of focus outlined are the right ones.
- Offer any initial feedback on the key questions posed within each area.

Main Report

Background

1. The City of London Corporation is renewing its Housing Strategy. This will set out the vision for the management of the City Corporation's 12 estates across London, our commitment to build 700 new affordable homes by 2025 and how our Housing Service will contribute to wider objectives around improving health and wellbeing, helping people achieve their potential and building sustainable communities.

Strategy Outline

2. The vision of the strategy, 'Providing Londoners with high quality, well managed homes in thriving communities' is supported by four proposed areas of focus, which are discussed in more detail below.

3. Members are asked to consider whether these areas of focus and the questions posed within them are the right ones for the strategy to explore. Members are also asked for any initial responses to the key questions posed.

Theme One – Providing homes for Londoners

4. Housing shortage is one of the most pressing economic and social issues that London faces. The capital's current building rate of 25,000 new homes per year falls far short of the 50,000 that are needed to keep pace with the growing population.
5. The City Corporation has committed to play its part in tackling the housing crisis by building 700 new affordable homes, a 25 per cent increase, on its social housing estates by 2025. A similar commitment has been made to deliver 3,000 new homes on sites within the City Corporation's wider portfolio of land.
6. The Housing Strategy will help realise these commitments by setting out the type, size and tenure of homes that would most benefit those with a connection to the City. It will also provide a framework to guide decision making on how best to achieve an increase in the number of homes on the City Corporation's housing estates. To do this, it will seek to answer the following key questions:
 - a. What housing need will the 700 new affordable homes aim to meet? The focus could be exclusively social housing, or some resources could go towards intermediate housing for middle income workers who are currently excluded from both social housing and home ownership.
 - b. What should the scope and scale of our proposals for existing estates be? Projects could either focus on infill opportunities or propose wider estate regeneration where this would be beneficial. If projects are disruptive, how can we ensure existing residents also benefit?
 - c. Where is additional social housing most required by those with a connection to the City? This involves a trade-off, as increased costs in Central London means fewer units can be delivered for the same resource.

Theme Two – High quality homes

7. Maintaining and improving our existing homes is our most important duty as a landlord. However, some elements of our housing stock are reaching the end of their life and need to be updated for residents' health, safety and comfort. The Welfare Reform and Work Act 2016 required all social landlords to reduce rents by 1% per year for four consecutive years. The cumulative cost of this to the City Corporation is estimated to be £4.5m and this has added to the pressure to carefully prioritise projects.
8. Maintenance is a pressing issue for many residents, aging stock is often poorly suited to the needs of older residents or people with mobility issues and, as the

investigation into the Grenfell Tower fire progresses, due consideration will need to be given to ensuring the safety of the City's estates.

9. Alongside the Asset Management Strategy, the Housing Strategy will set out our ambitions to improve the quality of our homes and assess how our existing stock can be adapted to better need today's needs. To do this, it will seek to answer the following key questions:
 - a. Has the City Corporation struck the right balance between responsive maintenance and planned works? If an increase in planned works is recommended, how can the impact of this on leaseholders be managed?
 - b. What are our aspirations around quality? Is it enough to meet the Decent Homes standard or should the City Corporation go further? Would this be realistic, given the amount to do on some estates?
 - c. How can our existing housing stock best be adapted to enable older people and people with disabilities to remain independent for longer?

Theme Three – Well-managed homes

10. How we manage our homes is crucial to residents' quality of life. While most tenants are satisfied with how their estates are managed, leaseholder satisfaction lags behind.
11. The private rented sector is home to over a third of City residents and has a growing presence on our housing estates. The City Corporation has a role to play in the private market, both as the strategic housing authority for the Square Mile and as the freeholder of the out of City estates.
12. The Housing Strategy will set out our ambitions as a housing management service, reviewing whether our current structures and resource allocations offer the best outcomes for residents and considering what it means to run estates with a mix of tenures. To do this, it will seek to answer the following key questions:
 - a. Our management model, of local Estate Offices is both unusual and comes at greater cost. Does the model meet the needs of residents to the extent that this is money well spent?
 - b. Tenants and leaseholders both report differing levels of satisfaction with our service. How can we provide a consistently good service, regardless of tenure or proximity to the City?
 - c. Is there any evidence of poor conditions or management problems in the either the Square Mile's private rented sector or in private rented homes on City Corporation estates? How are these best addressed?

Theme Four – Thriving communities

13. Decent housing is more than just bricks and mortar. Safe, secure and adequately sized housing is essential for a range of other outcomes including improving health and wellbeing, building sustainable communities and helping all people to achieve their potential.
14. For those with greater needs or vulnerabilities, providing timely advice, specially designed accommodation and personal support can prevent the breakdown of tenancies and homelessness, avoiding great personal upheaval and the need for more costly forms of provision or intervention.
15. The Housing Strategy will set out how the City Corporation's Housing Service will contribute to achieving these wider social objectives. To do this, it will seek to answer the following key questions:
 - a. Overcrowding has implications for physical and mental health, child development and impacts disproportionately on certain sectors of the population. What more can the City Corporation do to reduce overcrowding amongst social housing tenants and City residents?
 - b. Should the City Corporation provide more specialist housing to support older people, young people and care leavers, rough sleepers and those with health needs? Alternatively, could more be done to effectively provide this support in general needs housing?
 - c. How can housing play a greater role in health and social care prevention work, in supporting planned care and in maintaining good health and reducing the onset of care needs?

Development

16. Prior to the development of the strategy a full needs analysis will be carried out, drawing on evidence from the Strategic Housing Market Assessment, the Housing Register, HouseMark benchmarking, the Survey of Tenants And Residents (STAR), the Joint Strategic Needs Assessment (JSNA) and internal Performance Indicators.
17. Officers will engage with residents, tenants and leaseholders at an early stage. This will enable the strategy to be genuinely co-produced and to tackle the issues that are most important to our residents. We envisage this will take a form of a short exercise delivered through existing groups like the Housing User Board, as well as more in depth conversations between residents and senior officers.
18. Member feedback on a draft of the Housing Strategy will be sought at a Breakfast Briefing event in December, before a final draft of is prepared and brought back to this Committee for initial approval and onward recommendation to the Health and Wellbeing Board, Community and Children's Services Committee and Policy and Resources Committee.

Corporate & Strategic Implications

19. The Housing Strategy will contribute to achieving all five themes in the Department of Community and Children's Services Business Plan. These are:

- Safe - People of all ages live in safe communities, our homes are safe and well maintained and our estates are protected from harm
- Potential - People of all ages can achieve their ambitions through education, training and lifelong-learning
- Independence, involvement and choice - People of all ages can live independently, play a role in their communities and exercise choice over their services
- Health and wellbeing - People of all ages enjoy good health and wellbeing
- Community - People of all ages feel part of, engaged with and able to shape their community.

Conclusion

20. This paper presents an outline of a proposed Housing Strategy for the City of London. This strategy will set out the City Corporation's vision for its housing delivery programme and the management of its 12 housing estates. Member feedback is sought on the proposed scope and direction of the strategy.

Appendices

- None

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Committee: Housing Management & Almshouses Sub-Committee	Date: 26 Sept 2017
Subject: Fire Safety Update	Public
Report of: Director of Community & Children's Services	For Information
Report authors: Paul Murtagh and Jacquie Campbell	
Summary	
The purpose of this report is to update Members on fire safety matters since the paper presented by officers to the July meeting.	
Recommendation	
Members are asked to note and comment upon the report.	

Main Report

Background

1. Following the tragic fire at Grenfell Tower in West London, a paper was presented to your Sub-Committee, the Community & Children's Services Committee and the Audit & Risk Management Committee. This paper outlined actions taken in the immediate aftermath of the fire, and subsequently. It also set out plans for actions to be taken.
2. This paper updates Members on work carried out since July on the measures set out in the report.

Fire Risk Assessments

3. Frankham Risk Management Services Limited has been commissioned to carry out new fire risk assessments (FRA's) for each of our residential blocks. These new FRA's will be very detailed and will cover not only those areas previously inspected, but also any further concerns raised since the Grenfell Tower fire.
4. Work on the new FRA's has now commenced, with Golden Lane being the first estate to be assessed. Once all the assessments have been completed and submitted to us, they will be analysed by Property Services, Estate Management and the City's Fire Safety Advisor for accuracy and detail. Any

urgent recommendations will be addressed immediately and a subsequent detailed Action Plan will be developed to plan, programme and implement all other recommendations as appropriate.

5. It is expected that the new FRA's on our social housing residential blocks will be complete by the beginning of November. A summary report outlining the headline findings from the newly completed FRA's will be presented to your Sub-Committee at the earliest opportunity after the Action Plan has been finalised.
6. It is intended that the new FRA's will be made available to residents through the new Housing Fire Safety pages on the City's website. The current FRA's have already been made available here.
7. Work has for some time been well underway in addressing urgent issues highlighted by the previous (2016) FRA's carried out by Frankham Risk Management Services Limited. This urgent work includes improving fire safety signage in our blocks, removing barriers to fire escape routes, improving emergency lighting and remedial works to communal fire doors.

Communication with Residents

8. Detailed information, in the form of question and answer sheets, have been produced specifically for each of our estates and have been delivered to all homes. They too have also been posted on the Housing Fire Safety pages on the City's website. Feedback from residents has been very positive.
9. A further follow-up letter was sent to residents in early September, updating them on actions being taken, and addressing any specific concerns raised on their estates since the question and answer sheets were distributed.
10. Estate staff have been proactively identifying households where there may be vulnerable residents and have been making sure records are up to date and offering support. Any resident unsure of fire escape routes in their particular block have been offered a visit from estate staff.
11. A series of five informal drop-in meetings have been held at estates where there are blocks of flats of six or more floors. These have been attended by the Director of Community & Children's Services and the two Assistant Directors, plus other staff. The sessions were advertised as an opportunity for any residents with concerns about fire safety to ask questions and talk to senior managers. Attendance has been low, typically ranging from 2-10 residents, which indicates that initial concerns have largely been addressed. Nevertheless, the residents who have attended have found them very useful and have expressed their appreciation for the sessions.
12. New fire notices have been created, clarifying that the London Fire Brigade (LFB) continues to advise residents to stay in their flat in the event of a fire in their block, but also advising them on what to do if their flat is affected by fire or smoke, or they feel in danger. We hope this will address the confusion that some residents expressed about what to do in the event of a fire.

Front Doors, Sprinkler Systems and Alarms

13. We have identified a number of front entrance doors from each of our residential blocks of flats that have been, or will be, sent away to the Building Research Establishment (BRE) for rigorous fire resistance testing. This will give us the information we need in relation to the level of fire resistance these doors and frames currently provide and whether or not that level of fire resistance is adequate. Consequently, we will be able to properly prioritise, plan and cost out our door replacement programme. Priority for testing has been given to our tower blocks.
14. At Great Arthur House, a recent inspection from the LFB identified a fire safety issue relating to the glazed fanlights above the front entrance doors. Immediate remedial action was required and has been taken and our Contractors are in the process of replacing all the existing glazed fanlights with fully compliant fire resistant alternatives.
15. The current programme of electrical testing on all estates includes the installation of hard-wired carbon monoxide, smoke and heat detectors in all our tenanted flats. This work, which had commenced well before the Grenfell Tower fire, is progressing well.
16. A feasibility study into the potential installation of sprinkler systems in our tower blocks has been commissioned. All the relevant surveys have now been completed and we are now awaiting submission of the final report from our consultant, Butler & Young. We expect to be in a position to present the findings from the feasibility study to Members before the end of the calendar year.
17. The LFB continues to advise against the installation of fire alarms in communal areas but, this will be reviewed over time as part of the new FRA process.

Estate Management

18. Estate staff have stepped up their work to ensure that balconies, walkways and exits are kept clear from hazards. This includes the removal of combustible material from outside properties, along with any items which might cause a trip hazard for residents or firefighting crews in the event of an emergency.
19. The vast majority of residents have understood the need to comply with guidance and have worked with officers to reduce items outside their homes. However, some have been more difficult and have not complied. Having issued notices, given extensive warning, offered help and advice and also offered mediation, we are now in a position where we will have no choice but to remove any residents' items which do not meet our Fire Safety Protocol, as agreed by Members. Whilst we are fully entitled to remove any items from communal areas, we do ensure that proper notice is given to residents and items are stored for a period of time to allow owners to collect them.
20. A review of estate walkabouts and checks has commenced, with a view to improving consistency and monitoring, and to introducing an automated system for recording data and follow up actions.

Resources

21. As Members will appreciate the level of work relating to fire safety that has arisen, and continues to arise, in the aftermath of the Grenfell Tower fire has been unprecedented. The vast burden of this work has fallen on the existing staff within the Housing Property Services and Estate Management teams. Staff have responded commendably to the challenge that this considerable amount of extra work has created and their efforts have been reflected in the positive feedback we have received from residents in dealing with, and allaying, their fears in relation to fire safety in their homes.
22. We have recently appointed a new Health and Safety Manager within DCCS, whose main priority is to co-ordinate our work around fire safety with particular focus on the FRA process and the implementation of the resulting Action Plans.
23. It may be prudent at this stage, to alert Members to the potential need for additional resources to ensure that we are able to deal effectively with the fire safety improvement measures that we are considering and have committed to with particular regard to:
 - Door replacement programme;
 - Installation of fire suppression systems (sprinklers);
 - Fire safety management planning;
 - Property inspections and visits to assess and advise on fire safety risks in homes, discuss the support needs of households and address any other issues;
 - Communications and website development.
24. At this stage, until we have the results of the fire resistance testing, feasibility study into sprinklers, completion of the new round of FRS's and information from government in relation to changes in Building Regulations and guidance from the Grenfell Tower enquiry, we are not in a position to properly identify any additional resources that may be required. We will naturally keep Members informed on this matter, and seek the necessary approvals, when we are in a position to do so.

Background Papers:

Fire Safety in the City's Residential Blocks – report to Housing Management & Almshouses Sub-Committee, 03 July 2017

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Committees:		Dates:
Housing Management & Almshouses Sub-Committee Projects Sub-Committee		26 September 2017 04 October 2017
Subject: Refurbishment works to door entry systems at the Golden Lane (partial), Holloway and York Way Estates.	Gateway 7 Outcome Report Regular	Public
Report of: Director of Community & Children's Services Report Author: David Downing		For Decision

Summary

Programme status	Works complete. Pending approval of Gateway 7 report and project closure.
Project Status compared to GW2	Budget: Green Specification: Green Time: Red (works envisaged to complete by end of 2015 at G2)
RAG Status against last approved	Budget: Green Specification: Green Time: Green
Approved budget at Gateway 5	Works: £245,143.00 Fees & Staff Costs: £37,840.63 Total: £282,983.63
Total Outturn Cost at Gateway 7	Works: £257,775.25 Fees & Staff Costs: £22,289.66 (Fees: £11,315 + Staff Costs: £10,974.66) Total: £280,064.91
Overall Project Risk	Green/Low

Summary

AJS Ltd were contracted to renew the door entry systems at Golden Lane (partial), Holloway and York Way housing estates, replacing aging legacy systems with modern equivalents. The project was delivered on programme with a minor overspend to the works budget of £12,632.25 due to a number of minor contract variations that arose as works progressed. Despite this, with professional fees and staff costs included, the final cost for the project was £2,918.72 under that which was approved at Gateway 5.

Recommendations

1. It is recommended that the lessons learnt be noted and the project be closed.

Main Report

1. Brief description of project	Renew door entry systems to Holloway Estate, York Way Estate and Golden Lane Estate (partial).
2. Assessment of project against SMART Objectives	<p>No SMART objectives were set for this project at the time of inception (2014). However, in retrospect these would be as follows:</p> <p>Specific and Realistic: Modern door entry systems to be fitted to the agreed specification. This was achieved.</p> <p>Achievable and Measurable: Modern door entry systems to be fitted to agreed budget and timescales. The project was delivered within the overall project budget and within the timescales set at Gateway 5.</p>
3. Assessment of project against success criteria	<p>The project has achieved its objectives:</p> <ol style="list-style-type: none"> 1. New door entry systems have been successfully installed in the blocks covered by this project. 2. Facilities have been improved for residents by the install of modern, reliable systems. 3. Safety and security for residents has been improved by modernising the door entry system.
4. Key Benefits	<ol style="list-style-type: none"> 1. A reduction in the costs of responsive repairs on the door entry systems on these Estates. 2. Increase to capital value of the blocks through improved services. 3. Greater security for residents due to modern and reliable facilities.
5. Was the project specification fully delivered (as agreed at Gateway 5 or any subsequent Issue report)	Yes
6. Programme	The project was completed within the agreed programme

7. Budget

The project was completed within the agreed budget
The total project budget at Gateway 7 (including works, fees and staff costs) was £2,918.72 under that which was approved at Gateway 5.

Budget at Gateway 5	
Works	£245,143.00
Fees and staff costs	£37,840.63
Total	£282,983.63

Outturn at Gateway 7	
Works	£257,775.25
Fees and staff costs	£22,289.66
Total	£280,064.91

Within the outturn cost however an additional £12,632.25 works budget was approved post Gateway 5 (an increase of 5.15% of the tendered sum) to fund a small number of contract variations which were issued to the contractor during the works to address issues as they emerged.

To summarise, during the specification for the works it had been decided to re-use as much of the wiring from the old door entry system as possible to reduce costs. An allowance of £10,000 was made within the contract to cover any requirement for rewiring that should emerge during the course of the works should any of the legacy wiring be deemed unfit for purpose once the new systems were installed. Once on site and as the new installations progressed it was determined that this allowance was insufficient and a small amount of additional funds would be required to ensure all wiring for the new system was of sufficient quality.

In addition, several other minor low cost items were determined to be required beyond those specified in the tender. The major part of these included an additional card reader and cabling for the shared door between Stanley Cohen House and Basterfield House, Golden Lane Estate which was omitted from the tendered specification, the need to switch from a planned hard wired connection to a wireless connection for the control hub for Shepherd House, York Way Estate upon discovery that the planned cabling route was not practical, and the relocating of seven new entry panels on Fairweather House, Holloway Estate following the identification of a health & safety issue due to the variance in size between old and new replacement panels.

<p>Final Account Verification</p>	<p>As not exceeding the thresholds as set out in the City's project procedures this small overspend was authorised by the Chief Officer in conjunction with the Chamberlain's head of Finance.</p> <p>5% of the value of the works contract is held as retention against the works during the 12 month defects liability period. This retention is due for release on 18th August 2017.</p> <p>Not Verified</p> <p>Verification by Chamberlains not required as project does not exceed risk or budgetary thresholds.</p>
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***Please note that the Chamberlain's department Financial Services division will need to verify Final Accounts relating to medium and high risk projects valued between £250k and £5m and all projects valued in excess of £5m.**

Review of Team Performance

<p>8. Key strengths</p>	<p>1. Works were completed to a high quality.</p> <p>2. Works were completed with minimal disruption to residents.</p> <p>3. Works were completed on programme and within authorised total project budget.</p>
<p>9. Areas for improvement</p>	<p>1. The use of external project manager added an additional layer of communication between the City and contractor which was not always conducive to efficient working. Now that internal resources are in place we would look to use directly employed project managers to deliver works of this type in the future where possible.</p> <p>2. A more robust specification would have reduced the need for the contract variations that caused the minor overspend to the works budget approved at Gateway 5.</p>
<p>10. Special recognition</p>	<p>N/A</p>

Lessons Learnt

11. Key lessons	<p>1. More detailed initial site surveys at an early stage of the project would allow for a more robust specification of works. This would have reduced the likelihood of requiring additional funds to those approved at Gateway 5.</p> <p>2. Whilst outsourcing project management for a project of this nature allowed the project to proceed when internal resource was lacking, this did create an additional layer of communications between the City and contractor which meant when issues arose with the works or project finances these were not resolved as quickly as may have been the case with an internal project manager.</p>
12. Implementation plan for lessons learnt	<p>1. Experience gained from this project will be implemented in other similar future projects. A project to replace door entry systems at other City housing estates is at the early stages of progression through the Gateway process and is being informed by the above.</p>

Appendices

None

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Committees:		Dates:
Housing Management & Almshouses Sub-Committee Projects Sub-Committee		26 September 2017 04 October 2017
Subject: Decent Homes works to properties previously omitted from programmes (Callbacks 2013-17)	Gateway 7 Outcome Report Regular	Public
Report of: Director of Community & Children's Services Report Author: David Downing		For Decision

Summary

Programme status	Works complete. Pending approval of Gateway 7 report and project closure.
Project Status compared to GW2	Budget: Green Specification: Green Time: Green
RAG Status against last approved	Budget: Green Specification: Green Time: Green
Approved budget at Gateway 5	£500,000.00
Total Spend to Date	£472,686.66
Overall Project Risk	Green/Low

Summary

The Callbacks 2013-17 project provided a capped budget of £500,000 to facilitate kitchen, bathroom and heating upgrades to tenanted properties on City of London housing estates previously omitted from large scale Decent Homes programmes. These properties would have been omitted as they may have met the standard at the time or the works may have been refused by the tenant in occupation. Over time, as previously acceptable components failed or when properties where works were refused fell vacant, the callbacks programme allowed the City to bring these ad hoc works up to the required standard within the certainty of a tendered specification at fixed schedule of rates. Abbott Property Solutions Ltd were awarded the contract and 49 kitchens, 37 bathrooms and 8 central heating systems were successfully upgraded and brought up to standard in this project.

Recommendations

1. It is recommended that the lessons learnt be noted and the project be closed.

Main Report

1. Brief description of project	A three year fixed budget, schedule of rates contract for the upgrade of kitchens, bathrooms and heating systems to City of London tenanted flats previously omitted from wider Decent Homes programmes.
2. Assessment of project against SMART Objectives	<p>No SMART objectives were set for this project at the time of inception (2014). However, in retrospect these would be as follows:</p> <p>Specific: tenanted flats requiring upgrades to kitchens, bathrooms and heating systems are brought up to the appropriate standard.</p> <p>Measurable: the fixed term schedule of rates contract allowed accurate financial monitoring and a high degree of cost certainty.</p> <p>Timely: the flexibility of the contract allowed works to proceed as required at fixed rates over a pre-defined period of time rather than subject to multiple procurements.</p>
3. Assessment of project against success criteria	<ol style="list-style-type: none">1. Tenanted flats identified for this programme have been brought up to Decent Homes standards.2. The City remains compliant with the relevant legislation.
4. Key Benefits	<ol style="list-style-type: none">1. Improved and modernised facilities for the residents living in the properties where works are completed.2. The value of the City's Housing assets is maintained.3. Compliance with statutory measures.
5. Was the project specification fully delivered (as agreed at Gateway 5 or any subsequent Issue report)	Yes
6. Programme	The project was completed within the agreed programme

<p>7. Budget</p> <p>Final Account Verification</p>	<p>The project was completed within the agreed budget</p> <p>Not Verified</p> <p>Verification by Chamberlains not required as project does not exceed risk or budgetary thresholds.</p>

***Please note that the Chamberlain’s department Financial Services division will need to verify Final Accounts relating to medium and high risk projects valued between £250k and £5m and all projects valued in excess of £5m.**

Review of Team Performance

<p>8. Key strengths</p>	<p>1. Works completed to a high quality.</p> <p>2. Works scheduled as and when required at fixed costs as determined by the tendered schedule of rates.</p>
<p>9. Areas for improvement</p>	<p>1. A number of minor unforeseen repair items were omitted from the schedule of rates as tendered. These were required to be agreed with the contractor as they emerged throughout the works contract. A more comprehensive specification at the point of tender would be advised for future similar programmes.</p>
<p>10. Special recognition</p>	<p>N/A</p>

Lessons Learnt

<p>11. Key lessons</p>	<p>1. The City’s required timescales for the contractor to contact residents, book in and then complete works were not set out in the tender documents. This will be rectified in future projects to ensure contractor’s performance criteria are adequately prescribed.</p> <p>2. A more detailed specification and accompanying schedule of rates will reduce the risk of unpriced items being negotiated mid-contract.</p>
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12. Implementation plan for lessons learnt	1. Experience gained from this project will be implemented in other similar future projects and indeed has already been incorporated into the Callbacks 2017-20 project currently progressing through the Gateway process.
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Appendices

None.

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