



Community & Children's Services Committee

Date: FRIDAY, 13 OCTOBER 2017
Time: 11.30 am
Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

Members:

Rehana Ameer	Angus Knowles-Cutler
Randall Anderson (Deputy Chairman)	The Lord Mountevans
Tom Anderson	Deputy Joyce Nash
Matthew Bell	Barbara Newman
Peter Bennett	Dhruv Patel (Chairman)
Richard Crossan	Susan Pearson
James de Sausmarez	William Pimlott
Mary Durcan	Henrika Priest
John Fletcher	Jason Pritchard
Marianne Fredericks	Deputy Elizabeth Rogula
Prem Goyal	Ruby Sayed
Alderman David Graves	Deputy John Tomlinson
Deputy the Revd Stephen Haines	Mark Wheatley
Caroline Haines	Deputy Philip Woodhouse
Alderman Robert Howard	George Abrahams
Deputy Catherine McGuinness	Mark Bostock
Deputy Henry Jones	

Co-opted Members: Laura Jørgensen and Matt Piper

Enquiries: Natasha Dogra tel. no.: 020 7332 1434
Natasha.Dogra@cityoflondon.gov.uk

Lunch will be served in Guildhall Club at the rising of the Committee

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 agree the minutes of the previous Committee meeting.

For Decision
(Pages 1 - 4)
4. **PUBLIC SECTOR EQUALITY DUTY PRESENTATION**
Report of the Director of Community and Children's Services.

For Information
(Pages 5 - 8)
5. **START TIME OF 8TH MARCH 2018 COMMUNITY & CHILDREN'S SERVICES COMMITTEE MEETING**
Report of the Town Clerk.

For Decision
(Pages 9 - 10)
6. **HOUSING ALLOCATIONS SCHEME 2017**
Report of the Director of Community and Children's Services.

For Decision
(Pages 11 - 110)
7. **UPDATE ON ROUGH SLEEPERS**
Report of the Director of Community and Children's Services.

For Information
(Pages 111 - 120)
8. **SEND UPDATE REPORT**
Report of the Director of Community and Children's Services.

For Information
(Pages 121 - 148)

9. **SIR JOHN CASS'S FOUNDATION PRIMARY SCHOOL - PROPOSED EXPANSION UPDATE**
Report of the Director of Community and Children's Services.
- For Information**
(Pages 149 - 154)
10. **SUPPORTING ADULT CARERS**
Report of the Director of Community and Children's Services.
- For Decision**
(Pages 155 - 158)
11. **CITY OF LONDON CORPORATION'S ACADEMIES DEVELOPMENT PROGRAMME**
Report of the Director of Community and Children's Services.
- For Information**
(Pages 159 - 168)
12. **UN-VALIDATED EXAMINATION RESULTS 2017**
Report of the Director of Community and Children's Services.
- For Information**
(Pages 169 - 176)
13. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
14. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
15. **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.

For Decision

Part 2 - Non-Public Reports

16. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the previous Committee meeting.
- For Decision**
(Pages 177 - 180)
17. **ISLINGTON ARTS FACTORY**
Report of the Director of Community and Children's Services.
- For Decision**
(Pages 181 - 198)

18. **WAIVER REPORT (RULE 25 PROCUREMENT CODE)**
Report of the Director of Community and Children's Services.

For Information
(Pages 199 - 204)

19. **HOUSING ESTATES (HRA) - MANAGEMENT OF LEASE EVENTS IN COMMERCIAL PREMISES**
Report of the City Surveyor.

For Information
(Pages 205 - 212)

20. **ELECTRONIC SOCIAL CARE RECORDING SYSTEM ISSUES REPORT**
Report of the Director of Community and Children's Services.

For Decision
(Pages 213 - 218)

21. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

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

COMMUNITY & CHILDREN'S SERVICES COMMITTEE

Friday, 8 September 2017

Minutes of the meeting of the Community & Children's Services Committee held at Committee Rooms, West Wing, Guildhall on Friday, 8 September 2017 at 11.30 am

Present

Members:

Dhruv Patel (Chairman)	Alderman David Graves
Randall Anderson (Deputy Chairman)	Deputy Catherine McGuinness
Tom Anderson	Angus Knowles-Cutler
Matthew Bell	The Lord Mountevans
Peter Bennett	Deputy Joyce Nash
Richard Crossan	Barbara Newman
James de Sausmarez	Susan Pearson
Mary Durcan	Deputy Elizabeth Rogula
Marianne Fredericks	Deputy Philip Woodhouse
Prem Goyal	Mark Bostock
	Deputy Henry Jones

Officers:

Neal Hounsell - Community & Children's Services Department
Gerald Merhtens – Community & Children's Services Department
Jacquie Campbell - Community & Children's Services Department
Natasha Dogra - Town Clerk's Department
Chris Pelham - Community & Children's Services Department
Sukhjit Gill - Community & Children's Services Department
Neal Hounsell - Community & Children's Services Department
Gerald Mehrtens - Community & Children's Services Department
Mark Jarvis - Chamberlain's Department
Nick Bodger – Community & Children's Services Department
Steven Chandler – City Surveyor's Department

1. APOLOGIES

Apologies had been received from Caroline Haines, Deputy Stephen Haines, Pooja Tank, Caroline Haines, William Pimlott, Deputy John Tomlinson, Henrika Priest, George Abrahams, Laura Jorgensen, Matt Piper and Tom Anderson.

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

Susan Pearson declared an interest in item 8 of the agenda as she was a leaseholder. Ms Pearson took part in the debate but did not vote on the decision.

3. MINUTES

RESOLVED – that the minutes be agreed as an accurate record.

4. EDUCATION CHARITY SUB COMMITTEE APPOINTMENTS

The Committee were invited to appoint four Members to the Education Charity Sub Committee.

Resolved – that the following Members be appointed:

Philip Woodhouse
Randall Anderson
Rehana Ameer
Susan Pearson

5. **CITY OF LONDON CULTURAL STRATEGY**

Members noted that the City of London Corporation's current cultural strategy expires at the end of December 2017. It came into effect during the 2012 Cultural Olympiad but no longer reflects the full extent of the organisation's activities across arts, culture, heritage and learning or its new and emerging ambitions.

Following a successful tender process, Global Cities Limited were appointed in May to assist the organisation in developing a new cultural strategy.

RESOLVED – that the report be received.

6. **BARBICAN AND COMMUNITY LIBRARIES CUSTOMER SURVEY**

The Committee was informed that in May 2017, two in-depth surveys of the stock and services offered to adults and children by Barbican and Community Libraries were carried out. Responses were received from 2,898 adults and 309 children:

- 99% of Barbican Library adult customers (1,682 respondents) said that overall they were satisfied with Barbican Library (98% in 2014).
- 99% of Shoe Lane Library adult customers (563 respondents) said that overall they were satisfied with Shoe Lane Library (98% in 2014).
- 95% of Artizan Street Library and Community Centre adult customers (269 respondents) said that overall they were satisfied with the library (95% in 2014).

Responses to both surveys and all customer comments have been analysed by the Head of Barbican and Community Libraries and professional staff, a programme of work is being put into place to address concerns and feedback is being given to library customers.

In response to a query it was noted that positive responses to the Children's Library user survey were extremely high, with 100% of customers scoring Barbican, Shoe Lane and Artizan Street Libraries as "Very good" or "Good". This is a clear endorsement of the work plans currently in place.

RESOLVED – that the update be received.

7. **QUARTER 1 BUSINESS PLAN UPDATE**

Members noted the progress made during Quarter 1 (April to June 2017) against the refreshed 2017-2022 Department of Community and Children's Services Business Plan

In response to a query it was noted that there is an overspend of approximately £148,000 for Adult Social Care. This budget is very volatile and a small change in client numbers can have a major impact on the outturn. Additional funding of £400,000 for Adult Social Care has been included in the Medium Term Financial Forecast. A paper to the Policy and Resources Committee will request this amount to be drawn down in the year.

RESOLVED – that the report be received.

8. FINANCIAL SUPPORT WITH MAJOR WORKS FOR LEASEHOLDERS

Members were informed that the current Five Year Programme of Major Works to City of London estates is much needed, but will result in large service charge bills for a number of our leaseholders.

The highest estimated costs will be for leaseholders in Great Arthur House, on the Golden Lane Estate, where the current project to replace the cladding and windows means that leaseholders will face particularly large bills. The City recognises that it can be difficult for some leaseholders to meet the costs of major works and it is appropriate to review the current range of measures offered.

Discussions ensued regarding the City's duty to striking the correct balance. The Committee agreed that the City has a legal duty to recover these costs. It also has a duty under the Local Government and Housing Act 1989 (Part VI Housing Finance) (the 1989 Act) to keep a housing revenue account (HRA) and a duty to formulate proposals to secure that the account for each year does not show a debit balance (section 76 of the 1989 Act).

In response to a query it was noted that the City already has provision in place to offer financial support to leaseholders in respect of major repairs bills, including payment by instalments, referrals for financial assistance to government departments and leaseholder loans. Under the terms of their lease, lessees can repay major works bills in instalments, effectively mortgaging their property to the City. In July 2010, the City approved a scheme providing a maximum discretionary loan of £41,000, with an interest-free period of up to three years. In addition, in cases of severe financial hardship, the City will consider buying back the tenant's property.

At the same time, the City has certain duties to keep a housing revenue account (HRA) and a duty to formulate proposals to secure that the account for each year does not show a debit balance. Where the City's duty is not compromised by the discretionary loan proposal, the City must still consider its fiduciary position in relation to its council tax payers, tenants and others who benefit from the application of the HRA funds as well as its power to provide discretionary loans to leaseholders, and must reasonably balance the interests of each.

In response to a question it was noted that under the terms of a City of London lease, leaseholders have the option to pay for major works over a ten year

period, with interest. This allows them to spread the whole cost of large service charge bills. (Major works are defined as refurbishment, renewal or repair works that cost more than 2.5% of the valuation for the property when it was purchased.) This means that every City leaseholder has the ability to borrow the full cost of any major works from the HRA, for a ten year term, with interest

Officers informed Members that they cannot recommend a higher level of support for leaseholders, as the cost to the HRA, the impact on the major works programme and the disbenefit to tenants would be too great

The Chairman moved that a vote take place for a final decision to be made. 16 Members voted in favour of Option C, with 2 Members voting against and 4 abstentions.

RESOLVED – that Members instructed Officers to progress Option c: Offer discretionary loans to owner-occupier leaseholders at an increased maximum amount of £72,500 with up to three years of interest-free borrowing and charge legal and administrative fees. We would propose that these fees be capped at a maximum of £500. The interest-free periods would result with the maximum amount increased to £72,500 from the existing £41,000. Leaseholders would be expected to pay the first £5,000 of any service charge demand with the loan offer covering any additional amount. The total cost to the HRA in terms of interest foregone based on a 100% take-up at the maximum borrowing limit by all eligible leaseholders on all City estates would be £612,000. A 75% take-up would charge £459,000 to the HRA. While this option does have an increased impact on the HRA, in officers' view the increase is marginal and it does recognise the new demands on leaseholders of the Five Year Major Works Programme.

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

There were no questions.

10. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

The Chairman informed Members that the Assistant Director Neal Hounsell would be retiring in January 2018. The Committee agreed that Neal's extensive contribution during his tenure both as Acting Director and Assistant Director would be missed and wished him all the best for the future.

11. EXCLUSION OF THE PUBLIC

RE SOLVED – 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 I of the Schedule 12A of the Local Government Act.

The meeting ended at 12:45pm

Chairman

Contact Officer: Natasha Dogra tel. no.: 020 7332 1434

Committee(s)	Dated:
Community and Children’s Services – For Information	13102017
Subject: Public Sector Equality Duty presentation	Public
Report of: Director of Community and Children’s Services	For Information
Report author: Moushumi Bhadra, Project and Equalities Manager	

Summary

This report provides a brief overview of the City of London Corporation’s requirements under the Public Sector Equality Duty, which falls under Section 149 of the Equality Act 2010.

The report also includes a brief presentation that will summarise the purpose of the Public Sector Equality Duty (known as the Equality Duty), as well as how Members and Officers demonstrate ‘due regard’ to the Equality Duty.

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

Background

1. An Equality Duty briefing session was delivered by Officers from the Equality and Inclusion Board as part of the Member Development Programme in June 2017.
2. Following this, the Equality and Inclusion Board agreed that Officers from the Equality and Inclusion (E&I) Board should attend Establishment Committee and Community and Children’s Services Committee to deliver a brief presentation to raise awareness of the City of London Corporation’s requirements to pay due regard to the Equality Duty in relation to local authority or port health functions.

Current Position

Public Sector Equality Duty

3. In 2011, the Public Sector Equality Duty (known as the Equality Duty) came into force. The Equality Duty requires public authorities, in carrying out their functions, to have due regard to the need to:
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010.
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
4. These are known as the three 'aims' of the Equality Duty. Under the Equality Duty, there are nine protected characteristics whose protected status was enhanced within the Equality Act 2010:
- Race and ethnicity
 - Disability
 - Religion or belief
 - Age
 - Sexual orientation
 - Gender
 - Gender reassignment
 - Pregnancy and maternity
 - Marriage and civil partnership
5. The Equality Duty requires public authorities to pay due regard to the Equality Duty for all services, including policy making, employment, planning and procurement. It also applies to any private bodies or voluntary organisations that carry out public functions on our behalf, such as any commissioned services.

Governance arrangements for equality and inclusion

6. The Equality and Inclusion (E&I) Board, chaired by the Town Clerk and co-chaired by the Director for Human Resources and the Director for Community and Children's Services, is the officer-led governing body for equality and inclusion in the City of London Corporation. The Equality and Inclusion Board reports on a quarterly basis to Summit Group and to Establishment Committee. The E&I Board also produces an annual report which summarises how the organisation is meeting the aims of the Equality Duty.

How do Officers demonstrate due regard to the Equality Duty?

7. Officers must demonstrate due regard to the Equality Duty when developing proposals that will have an impact on people (i.e. City residents, service users, workers, tourists and any other City of London customers) in relation to local authority or port health functions.
8. Officers are required to disclose whether there are any implications relating to equality and inclusion under the 'Corporate Implications' heading in Committee reports.
9. Officers can complete an Equality Analysis, an in-depth analytical tool to assess the equalities implications of a proposal on service users. An Equality Analysis will pay particular consideration to the needs of individuals who fall under the protected characteristics of the Equality Duty.

How do Members demonstrate due regard to the Equality Duty?

10. In the 'Equality Act 2010: Technical Guidance on the Public Sector Equality Duty in England', the Equality Duty applies to the "Common Council of the City of London in its capacity as a local authority or port health authority". This therefore places a requirement upon Members to scrutinise equalities implications of proposals that relate to local authority or port health functions.

11. If an Equality Analysis has been completed, it should:

- Be disclosed in the committee report and attached as an appendix to the report
- Be signed off by the relevant senior officer
- Be evidence-based to analyse the significance of any positive, negative or a combination of impacts on service users
- Identify any potential negative impacts and includes meaningful justification for why the proposal should go ahead
- Include a robust action plan to mitigate any negative impacts and enhance positive impacts if possible

Proposals

12. It is advised that Members note the legal requirements outlined in the Equality Duty and scrutinise any Equality Analysis proposals that are submitted as part of Committee reports.

Corporate & Strategic Implications

13. The requirement for Officers and Members to pay due regard to the Equality Duty is outlined in the Equality Act 2010, so it is a legal requirement. It is also outlined in the Corporate Plan, as well as the Departmental Business Plan.

Conclusion

14. In ensuring that Officers and Members pay due regard to the Equality Duty, the City of London Corporation meets the requirements of the Equality Act 2010 and :

- Delivers cost-effective and customer-focused services
- Places the needs of service users at the heart of policy development
- Advances equal opportunities and fosters good relations within our communities
- Meets its commitment to be a leader in equality, diversity and inclusion

Appendices

- Appendix 1 – Public Sector Equality Duty presentation for Members

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Agenda Item 5

Committee: Community & Children's Services Committee	Date: 13 October 2017
Subject: Start time of 8 th March 2018 Community & Children's Services Committee meeting	
Report of: Town Clerk	Public
	For Decision
Report author: Natasha Dogra	

Summary

Following the queries raised by some Members regarding the timings of meetings at the Community and Children's Services Committee of 11 May 2017 the Chairman of the Committee has requested, in consultation with the Deputy Chairman and the Director, that the Committee consider the possibility of holding the March meeting of the Community and Children's Services Committee at 4:00pm on Thursday 8th March 2018.

The Chairman would like to one-off test this start time at this, his penultimate meeting, and would ask Members to instruct the Town Clerk to make the necessary arrangements. The meeting will still be held in the committee rooms in Guildhall.

Refreshments for Committee Members and Officers could be provided at 3:30pm in place of the usual committee lunch.

Recommendations

It is **recommended** that the Committee agree for the 8th March 2018 Community and Children's Services Committee meeting to begin at 4:00pm, with a latest finish time of 5:30pm.

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Committee(s)	Dated:
Community and Children's Services	13/10/2017
Subject: Housing Allocations Scheme 2017	Public
Report of: Andrew Carter, Director of Community and Children's Services	For Decision
Report author: Adam Johnstone, Strategy Officer – Housing and Adult Social Care	

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 a Housing Allocations Scheme and to abide by the scheme when making offers of social housing tenancies to applicants.

The proposed scheme offers more 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 consultation has been carried out and several changes to the scheme have been made in response to the feedback received from partners and the public. The proposed scheme has been reviewed by the Housing Management and Almshouses Sub-Committee and is presented today for this Committee's approval.

Recommendation

Members are asked to:

- Approve the Housing Allocations Scheme 2017.

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

Current Position

5. The current hybrid 'points within bands' Housing 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 clarity.
6. The revised policy has been operating for about two years. During this time, a number of issues have arisen which need to be addressed to make optimal use of the City Corporation's limited social housing stock.
7. As a revision, the September 2015 changes were adopted after a two-week public consultation. It is possible that this could be open to challenge if an applicant were to successfully argue that the revision was effectively a new scheme and therefore required a full public consultation.

Proposal

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

Defining Lower Income

10. 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 Housing 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.

11. 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.

Increasing the Priority of the Studio Upgrade Group

12. 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 on the waiting list, available for reletting.
13. According to the City of London Strategic Housing Market Assessment, 48% of applicants on our waiting list require studio accommodation while only 31% of lettings are studios. In contrast, only 13% of applicants require a one-bedroom flat, while 30% of new lettings are one-bedroom flats. This mismatch between demand and supply means that if both waiting lists were closed to new applicants today, it would take 2.6 years to address the need for one-bedroom flats but 9.4 years to meet the need for studios.
14. 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 reletting. To address this, the proposed scheme increases the priority of the group to position 5 of 12.

A Points System

15. The current hybrid 'points within bands' Housing Allocations Scheme is unnecessarily complex. A decision to operate either a points or a bands system is needed to provide clarity.
16. The proposed Housing 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.

Introducing Extra Priority for Mixed Sibling Sharing

17. The current Housing 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 10 or over, are forced to share a bedroom. This is because the psychological effects of overcrowding are worse when siblings of different genders must share a bedroom during puberty.

Reducing the Priority of Applicants Who Act in Bad Faith

18. 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 actions such as anti-social behaviour or not paying their rent when they had the money to do so.
19. 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 tenants' concern. The proposed policy is intended to discourage this kind of behaviour and be fair to those applicants who genuinely need help to find suitable accommodation.

Increasing the Priority of Homeless Applicants After 12 Months

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

Consultation

23. A 13-week public consultation on the proposed Housing Allocations Scheme was held over the summer. Booklets were provided to City Corporation lending 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.
24. Feedback was received from 116 members of the public and 18 partner organisations, such as housing associations and neighbouring local authorities. A full report on the consultation process and results can be found in Appendix B.
25. A high level of support was received on all the changes outlined above. One proposed change – lowering the savings threshold that applicants must fall

beneath to qualify for social housing – did not receive sufficient public support and has been removed from the proposed scheme. A number of other minor changes have been made to the scheme in response to public feedback.

26. The post-consultation version of the proposed scheme has been reviewed and approved by the Housing Management and Almshouses Sub-Committee.

27. In response to a query from the Housing Management and Almshouses Sub-Committee the scheme has also been amended to clarify that the assessment of an applicant's level of savings will exclude pension fund assets intended to provide an income in retirement.

Corporate & Strategic Implications

28. The proposed Housing Allocations Scheme supports three priorities in the Department of Community and 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

29. Chamberlain's has been consulted and had no additional comments.

Legal Implications

30. An independent review of the Housing Allocations Scheme 2017 was provided by TLT LLP. The proposed scheme was amended in accordance with its advice.

31. Comptroller's has been consulted and had no additional comments.

Equalities Implications

32. A full Equalities Impact Assessment has been carried out for this policy and can be found in Appendix C. 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

33. 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 City Corporation's limited housing stock.

Appendices

- Appendix A – Housing Allocations Scheme 2017
- Appendix B – Consultation Report
- Appendix C – Equalities Impact Assessment

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Appendix A



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 <ul style="list-style-type: none"> • 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 • This would normally exclude pension fund assets needed to provide income in retirement 	✓	
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** **(5 Points)**
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 **(10 Points)**
 - sharing with 1-4 non-family members **(15 Points)**
 - sharing with 5+ non-family members.
- 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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Key

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

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

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

- 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.
- 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.
- Couples registered for a Studio Upgrade will receive secondary points for one bedroom lacking.
- 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).

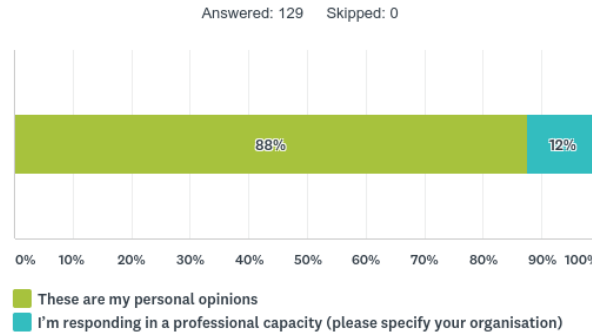
Letters were sent to every household on the waiting list and were included in every tenant's July rent statement. Officers spoke at Residents Open Meetings at Middlesex Street, Avondale Square, Golden Lane and Sydenham Hill, as well as at an event organised and promoted by the Golden Lane Tenants Forum.

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?

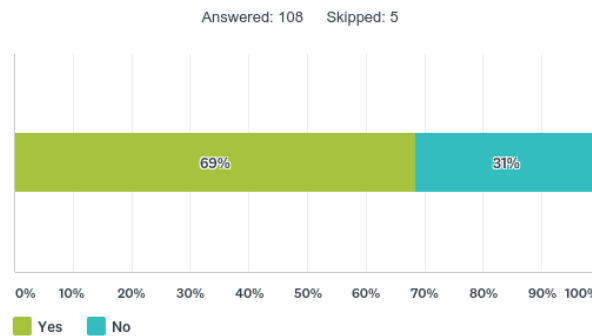


Members of the public made up 88% of respondents and partner organisations made up 12%. The partners to provide a response were:

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

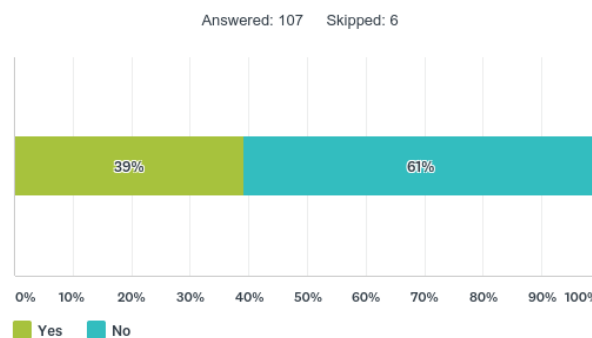
Of those respondents who were members of the public, the majority live within the Square Mile.

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.

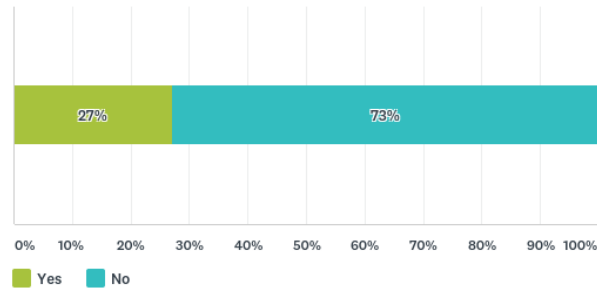
Q3 Are you a tenant of the City Corporation?



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.

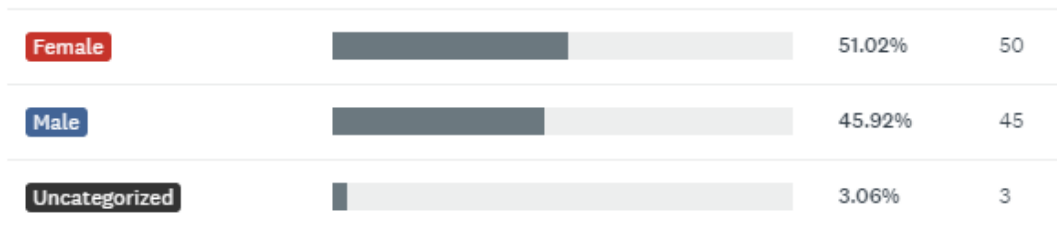
Q4 Are you currently on the City Corporation’s Housing Register (either as a new applicant or as a tenant wanting to transfer)?

Answered: 107 Skipped: 6



Respondents were almost equally split between men and women.

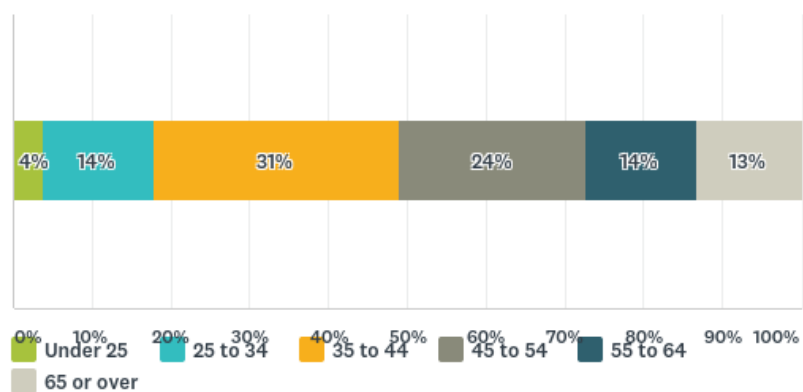
What is your gender?



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

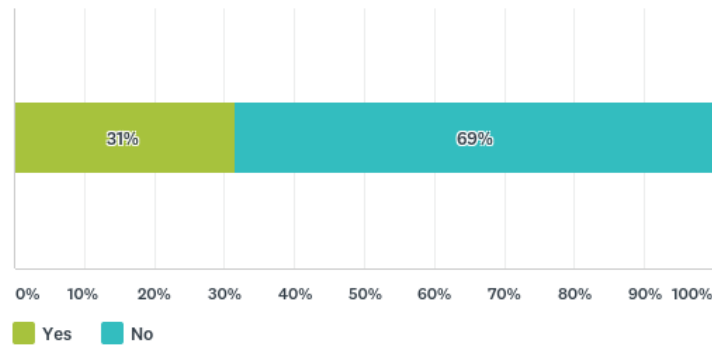


Age Bracket	Survey	City
18 to 25	4%	10%
25 to 34	14%	26%
35 to 44	31%	17%
45 to 54	24%	17%
55 to 65	14%	13%
65 and over	13%	18%

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?

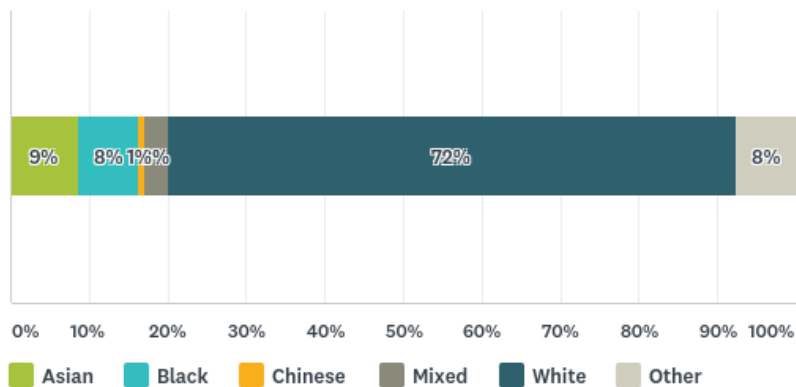
Answered: 105 Skipped: 8



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.

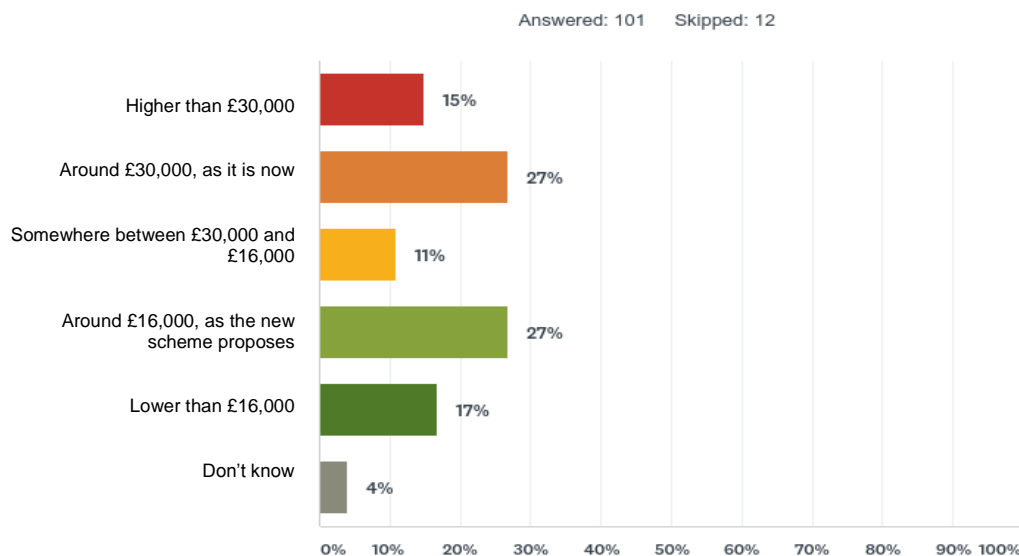
We believe this is enough for someone to rent a home in the private sector and are considering lowering our savings threshold in order to target limited social housing at those most in need.

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.

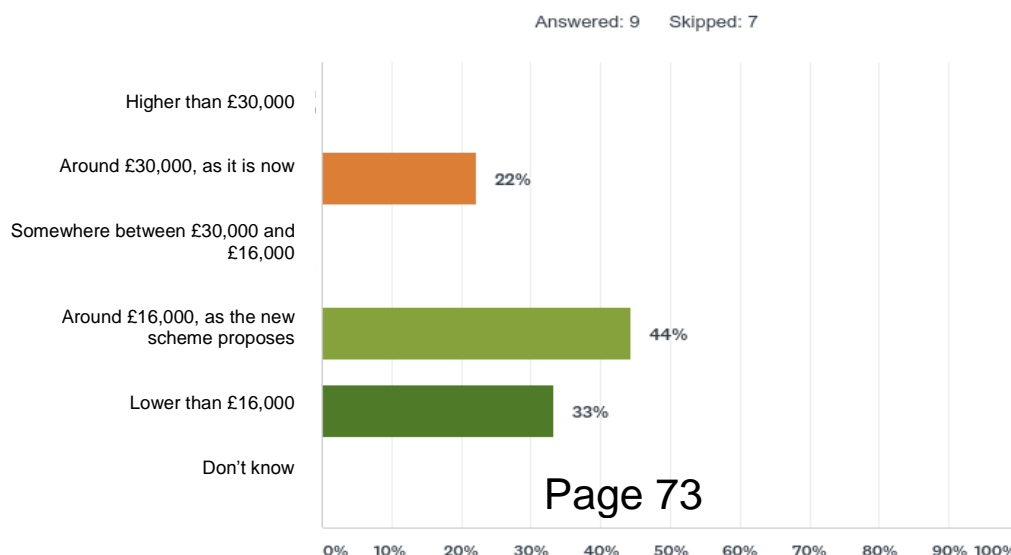
3.1 Survey Data

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.

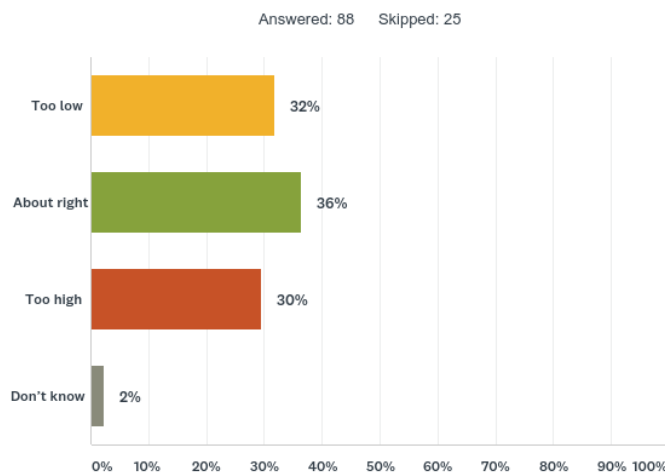
Why not London Living Wage?

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.

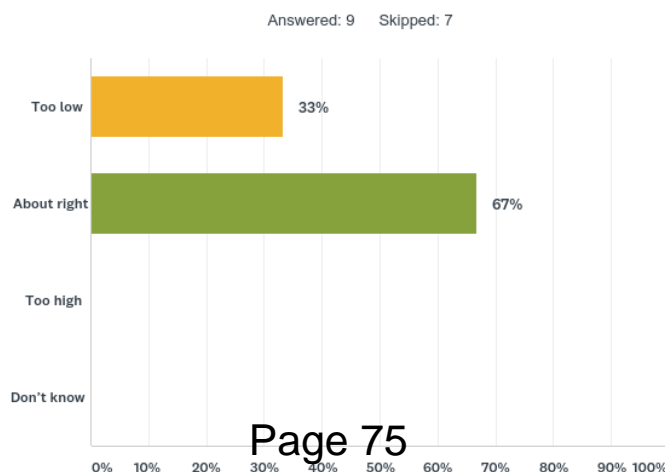
However, raising our criteria this much could mean applicants earning relatively higher incomes may crowd out those on lower incomes most in need of affordable housing. Those earning between £29,640 and £60,000 would still be able to get preference for housing in other ways – for example, if they are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

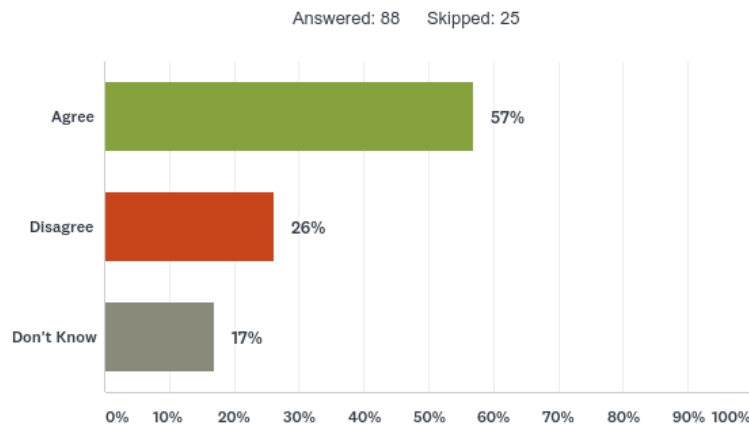
The current Housing Allocations Scheme only offers the 'low income' preference discussed in the last question to people who work in the City of London.

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:

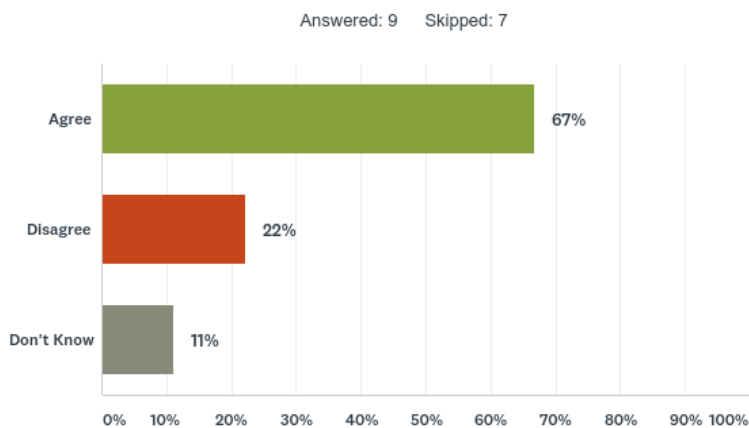
- City residents and sons and daughters of City Corporation tenants who work outside of the Square Mile
- City residents who have recently lost their job
- City residents who are not in paid employment but who experience difficulties paying private rents as a result of recent benefit changes.

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.

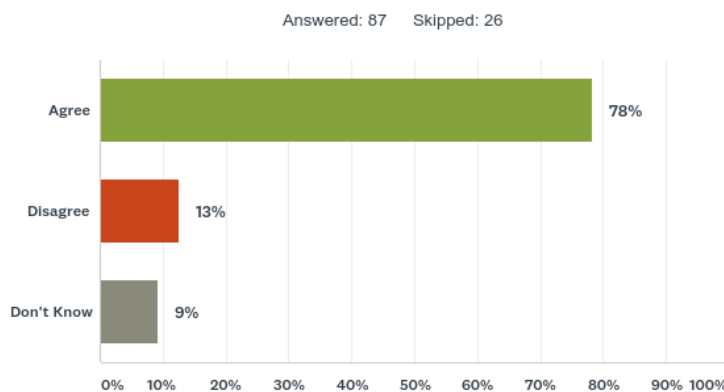
However, because of the current level of priority offered to this group, very few Studio Upgrade transfers take place.

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).

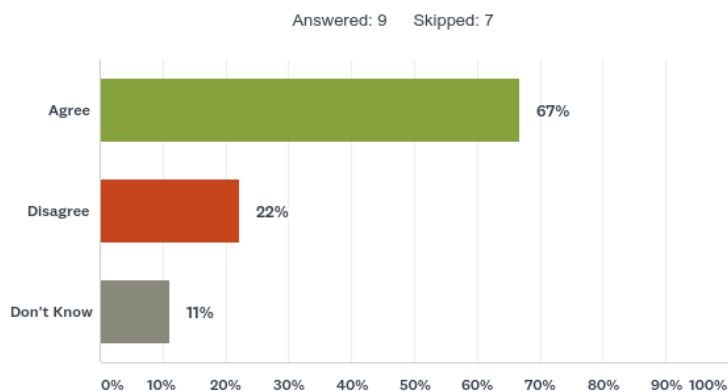
6.1 Survey Data

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)

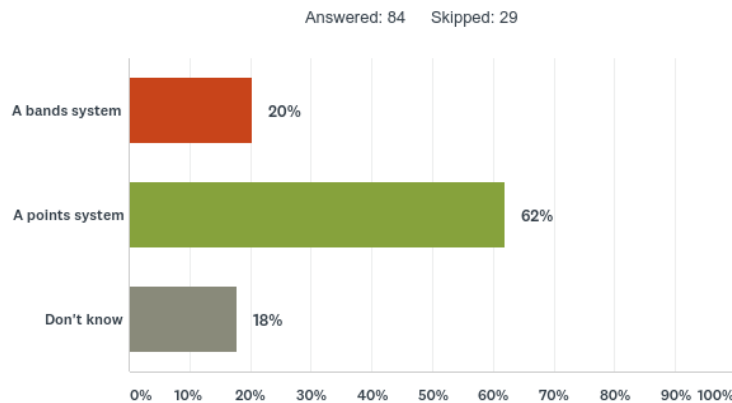
Waiting time: 6 months

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.

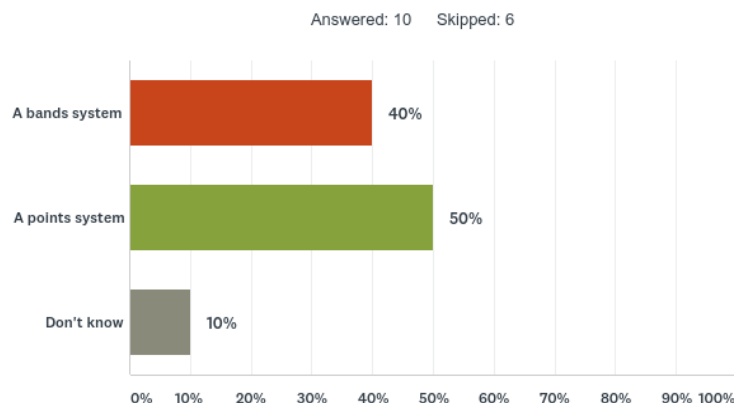
7.1 Survey Data

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.

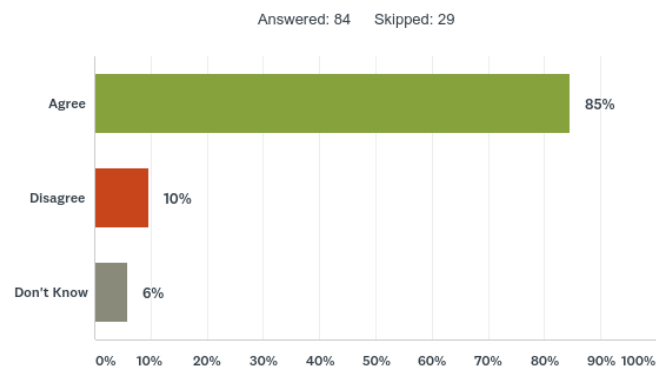
The Williams family also live in a two bedroom flat with their three teenagers and are on the list for a transfer to a larger home. They have one boy and two girls.

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

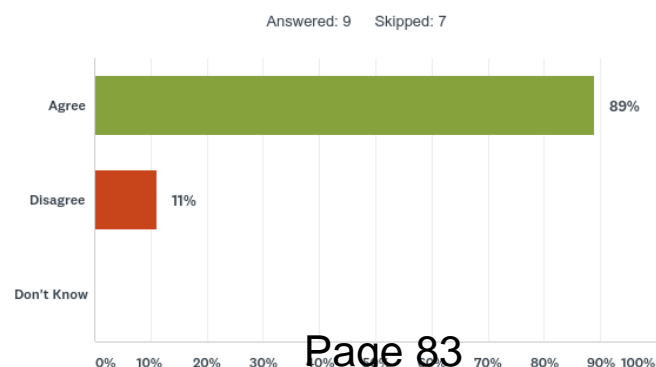
We believe that the psychological effects of overcrowding are worse when siblings of different genders must share a bedroom during puberty. We are proposing offering 10 extra points to families where this is happening. This would mean that the Williams family was offered accommodation first, regardless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

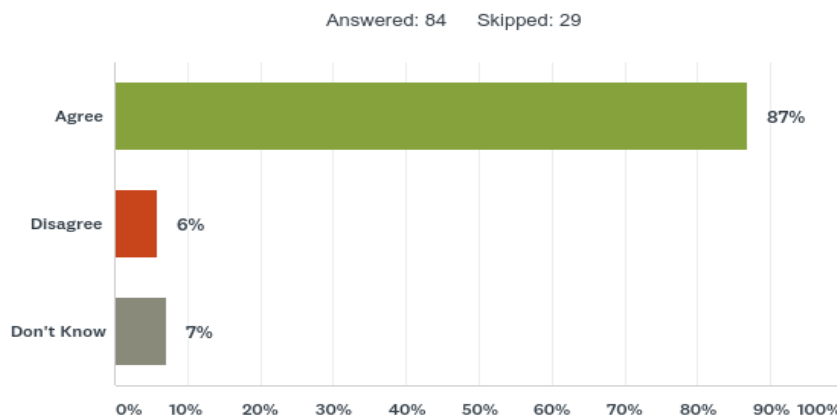
This is a legal term that means someone acted in a way, or failed to do something, that caused them to lose their home. This could be something like anti-social behaviour or not paying rent when they had the money to do so.

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.

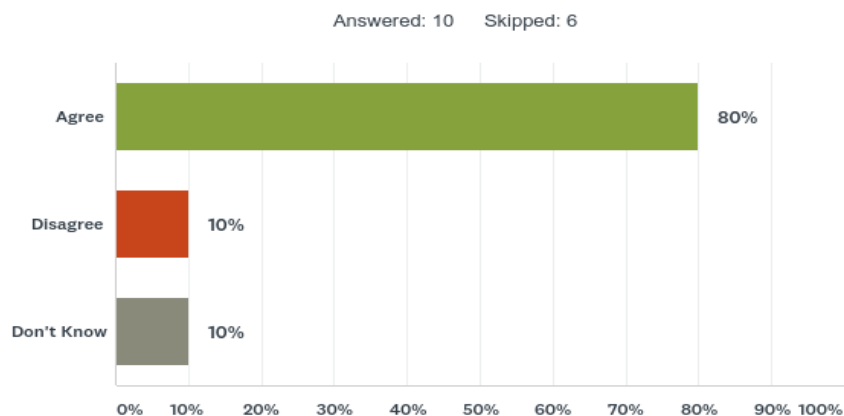
We want to discourage this kind of behaviour as it is unfair to those applicants who genuinely need help to find suitable accommodation.

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](#)

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](#)

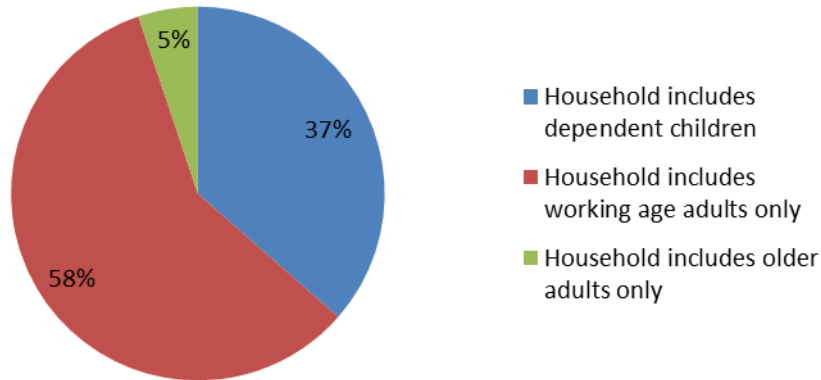
Age

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

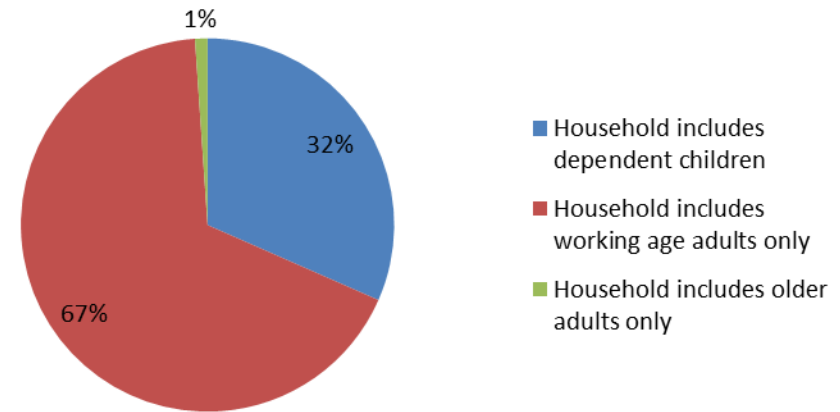
The above borough statistics are of limited use when discussing housing allocations. Of the City's twelve housing estates (the source of all transfer applications), ten are located outside of the Square Mile. Most new applicants on the waiting list qualify by virtue of working in the City, but they generally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

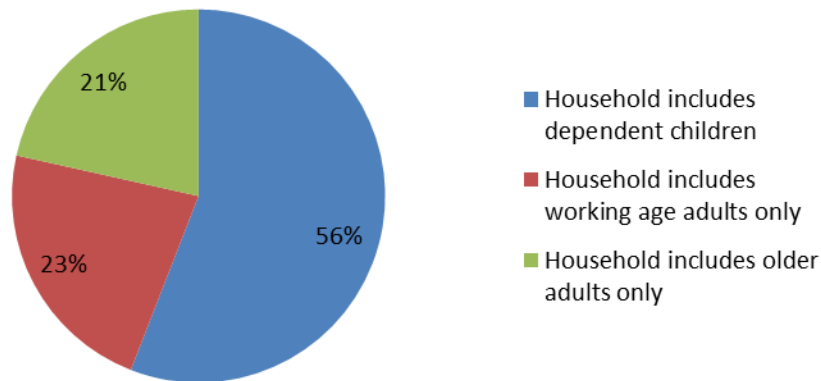
Housing Register by Age



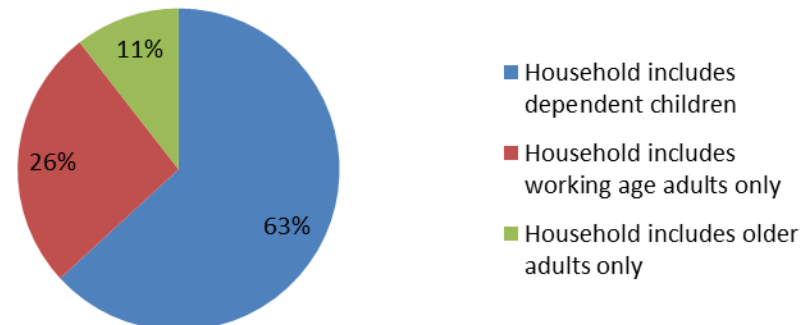
Waiting List by Age



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 a disability or injury sustained on active service.

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

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

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

6) Positive impact.

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

8) Positive impact.

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

10) Positive impact.

11) Positive impact.

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

13) Positive impact.

Key borough statistics:

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

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

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

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

Pregnancy and Maternity

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

Information about pregnant women and mothers on maternity leave on the Housing Register is not reported on. However, the number of households with dependent children on the Housing Register (37%) shows that for a minority of applicants, pregnancy will be relevant at a point during their application.

Of those households accepted as statutorily homeless in 2016-17 to date, 5% were found to be vulnerable (and therefore in priority need) due to a pregnancy. This does not mean to say that other applicants were not also pregnant but were first found to be in priority need for another reason (e.g. dependent children). Applicants on the homeless list are therefore more likely to have pregnancy / maternity as a protected characteristic than the general City of London population.

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

- 1) The scheme proposes exempting homeless households from further local connection requirements (in addition to those already included in the Part VII homeless process). This will enable homeless households, more likely to include a pregnant woman or mother on maternity leave, to be housed faster.
- 2) The new scheme proposes awarding extra points to homeless households, at least 5% of which contain a pregnant woman or mother on maternity leave, who have been in temporary accommodation for twelve months or longer.
- 3) The proposed ‘priority date’ system includes a provision that a homeless acceptance will always reset this date, lengthening waiting times. The makeup of the homeless list means this will have a disproportionate effect on pregnant women and mothers on maternity leave.

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

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

Key Borough Statistics:

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

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

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

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

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

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

Race

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

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

Analysis of the Housing Register provides a better guide to the ethnic breakdown of those most affected by these proposals. The Housing Register can be divided into the waiting list of new applicants and the transfer list of current tenants in need of different accommodation. Also provided (on page 12) is a snapshot of 2016/17 homeless acceptances to date, which forms a small but distinct part of the waiting list of new applicants.

Just under half (48%) of the Housing Register is White, while 42% belong to another ethnic group. The ethnicity of 10% of the Register is not known. Differences emerge between the waiting list of new applicants and the transfer list of established City Corporation tenants. The transfer list contains more White British and Irish (by 13%), more Asian (by 6%) more Black (by 4%) and more Mixed (by 4%) applicants as a result of historical lettings patterns. The waiting list contains more South American (by 15%) and more Other White, generally EU citizens, (by 6%) applicants, as a result of more recent trends in international migration and City employment.

The ethnicity of accepted homeless applicants is recorded differently and is not directly comparable. However even if a working assumption is made to categorise all White British and Irish (25%), White Other (21%) and Central and South American applicants (16%) on the waiting list simply as 'White', the homeless list still contains considerably more White people (74%) than the waiting list (total 62%) of which it forms a constituent part.

Nationally, Black and Minority Ethnic households are more likely than white households to be living in overcrowded conditions – and this is particularly the case for Bangladeshi and Black African households. (*Adrian Jones, Black and minority ethnic communities' experience of overcrowding, August 2010*). Analysis of the City Corporation's waiting list also shows ethnic disparities in the prevalence of overcrowding:

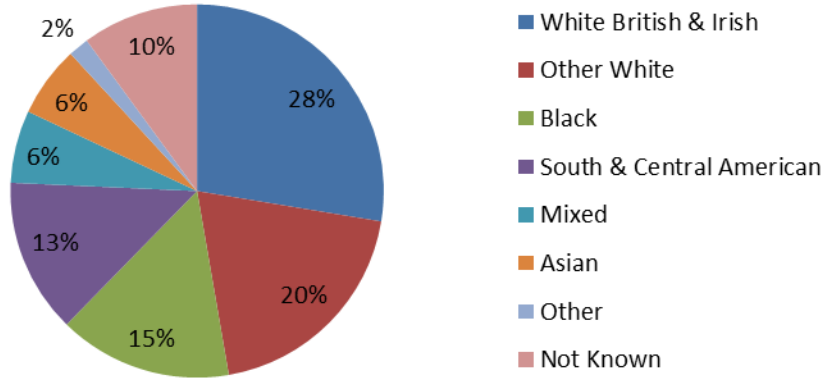
Race

Ethnicity	Percentage of Housing Register overcrowded by at least one bedroom	Percentage of Housing Register overcrowded by at least two bedrooms	Percentage of Housing Register lacking 3 or more bedrooms
Asian	63%	12%	2%
Black	57%	7%	3%
Mixed	57%	11%	0%
South and Central American	51%	7%	0%
Housing Register Average	49%	6%	1%
Other	47%	13%	6%
Not Known	47%	6%	1%
Other White	47%	6%	1%
White British	43%	4%	1%

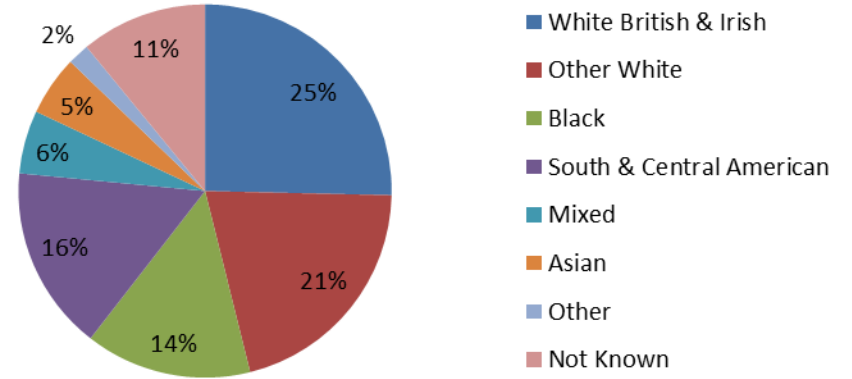
This shows that the picture of overcrowding on the City Corporation's waiting list is in line with national data. Asian, Black and Mixed households are considerably more overcrowded than the average, while White households are considerably less overcrowded.

Incidences of severe and very severe overcrowding are much rarer, but the ethnic trends persist. The exception to this is the 'Other' ethnic group, which while affected by an average amount of moderate overcrowding, is the most likely to lack 2 or 3 or more bedrooms. While worthy of note this statistic should be treated with caution due to the very low number of households in the 'Other' group (2 families lacking 2 rooms and 1 lacking 3).

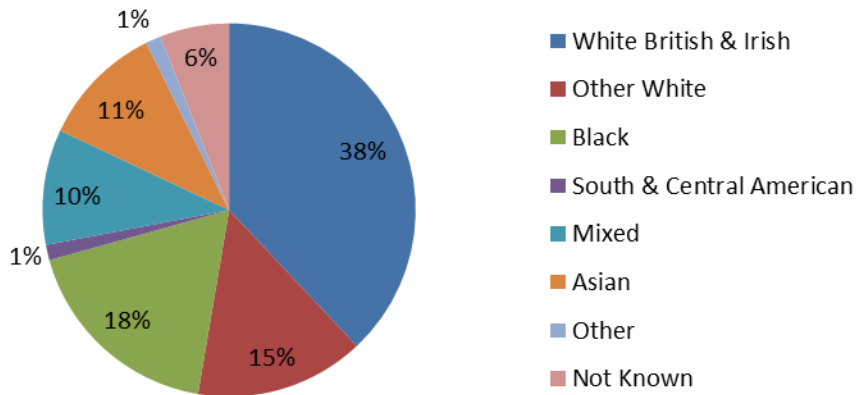
Housing Register by Ethnicity



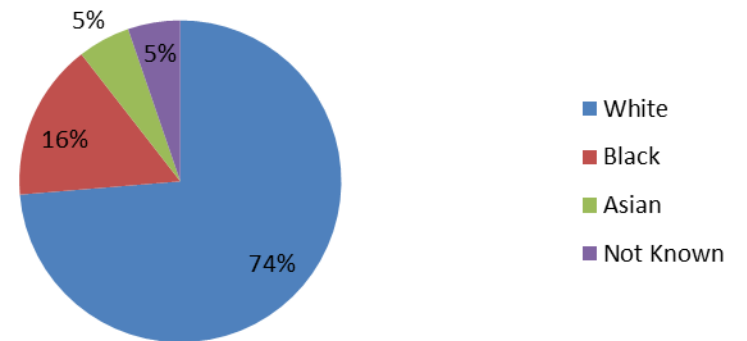
Waiting List by Ethnicity



Transfer List by Ethnicity



Accepted Homeless Applicants by Ethnicity



Race

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

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

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

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

4) The new scheme proposes awarding extra points to homeless households, 74% of which are White, who have been in temporary accommodation for twelve months or longer.

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

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

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

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

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

1) Mostly positive impact. A more needs focused system will benefit BAME households affected by overcrowding. There will be a corresponding loss of priority for those with fewer needs and this may be concentrated amongst White households. However White applicants who also have complex housing needs will benefit.

2) Positive impact.

3) Positive impact.

4) Positive impact.

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

6) Positive impact on overcrowded (and more likely to be BAME) households.

7) Positive impact. This will benefit the most overcrowded (and more likely to be BAME) households. The proposal does risk disadvantaging those with limited English, who will be less able to engage with a Personal Housing Plan. Steps to mitigate this will be implemented as the City Corporation's general approach to PHPs (a product of the Homelessness Reduction Bill) is developed.

8) Positive impact (as most of the City Corporation's Looked After Children are Unaccompanied Asylum Seeking Children). This system does remove choice from applicants but this is mitigated by meeting with the applicant and their social worker to discuss their preferences for accommodation prior to an offer being made. It also

Race	
9) The new scheme proposes providing additional priority to the most severely overcrowded households. Of those likely to be awarded this priority (lacking three bedrooms or more), 79% are from a non White ethnic group.	enables those who don't understand or engage with CBL to gain housing too. 9) Positive impact.

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

Religion and belief are not thought to have relevance for housing needs and allocations independently of race.

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

<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*

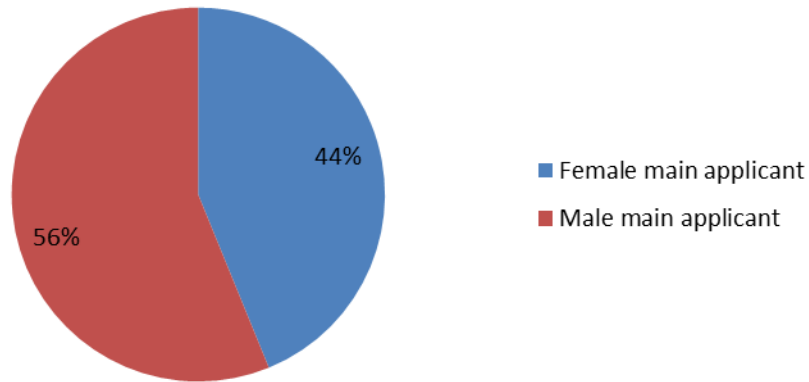
The above borough statistics are of limited use when discussing housing allocations. Of the City's twelve housing estates (the source of all transfer applications), ten are located outside of the Square Mile. Most new applicants on the waiting list qualify by virtue of working in the City, but they generally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

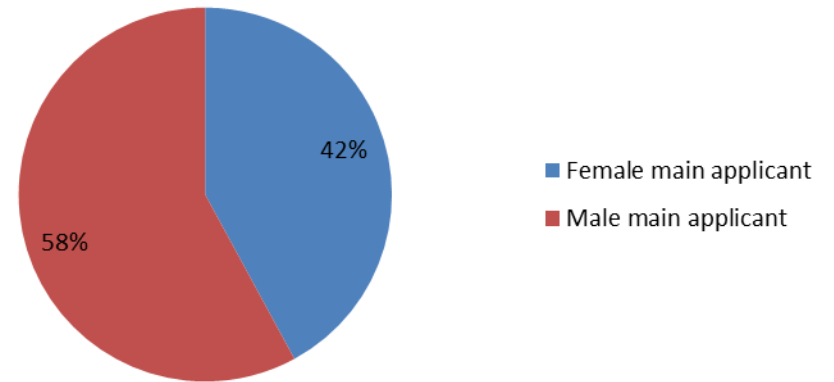
Well over half of applications on the Housing Register and the waiting list are made by a male applicant (who may or may not have a partner). The transfer list is evenly split, and around a quarter of transfer applications are in a male tenant's name. In contrast, well over half of homeless applications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

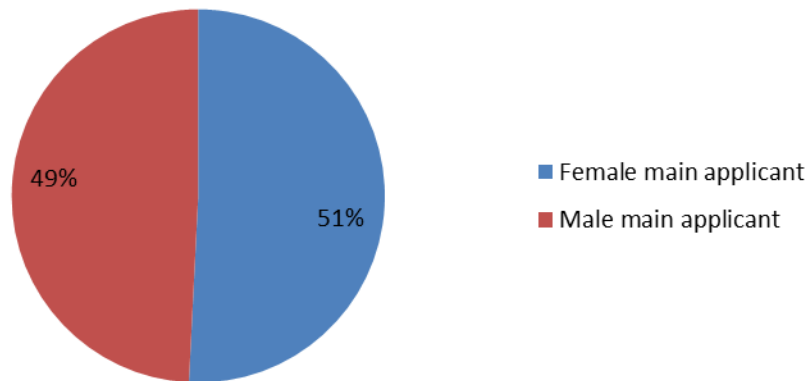
Housing Register by Gender



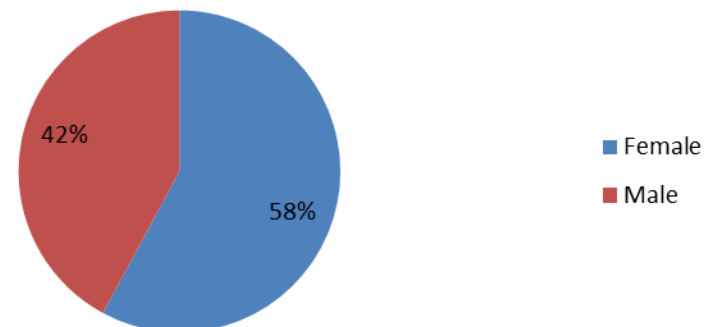
Waiting List by Gender



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 as they enter puberty.
- 5) The new scheme expands the definition of domestic violence from physical violence to also include psychological, sexual, financial and emotional abuse.
- 6) The scheme proposes increasing the priority given to the 'Studio Upgrade' letting route, which will move up from position 3 of 4 in the current scheme to position 5 of 12 in the new one and expanding the category to include younger couples as well as parents whose children do not live with them, but visit regularly.
- 7) The scheme sets out a threshold stating how much time a dependent child must spend in a household before they will be considered part of that household for the purposes of deciding a property size entitlement. The new scheme proposes lowering this threshold from 51% of the time, to 50% of the time. This change will enable separated couples to share parental responsibility, should they wish to.
- 8) The scheme proposes raising the threshold City workers must earn beneath to receive preference in the 'lower income City connection' category from £26,000 to £29,640. This will enable a number of applicants to move up from the 'low priority' group to a group from which they could realistically hope to receive an offer of accommodation.

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

- 1) Positive impact.
- 2) Positive impact.
- 3) Negative impact – but a proportionate one to the City Corporation's need to manage the use of temporary accommodation. The effect is mitigated by greatly increasing the priority of homeless households after twelve months.
- 4) Positive impact.
- 5) Positive impact.
- 6) Positive impact – as the non-resident parents afforded increased priority here are at least 95% male (*Statutory Child Maintenance Caseload, Department for Work and Pensions, 2010*).
- 7) Positive impact – as per the answer to point 6, we believe the parents most likely to lose out on contact with their children under the 51% rule, are male.
- 8) Positive impact. The '*Annual Survey of Hours and Earnings 2016 - Workplace Analysis*' shows that pay is substantially lower for women working in the City. The median annual gross pay of the second lowest tenth of men working in the City is £35,433. The median annual gross pay of the second lowest tenth of women working in the City is £24,420. Therefore, while many people could be advantaged by this change, the majority of them will be women, who are underrepresented on our waiting list.

Key borough statistics – suggested sources include:

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

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

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

Sexual Orientation and Gender Reassignment

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

Information the Sexual Orientation and Gender Reassignment of people on the Housing Register is not reported on.

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

- 1) The proposed allocations scheme makes no distinction between applicants based on sexual orientation or between homosexual and heterosexual relationships.
- 2) The allocations scheme sets out the City Corporation’s bedroom standard, which guides how many bedrooms each household is entitled to based on the ages and genders of household members and the relationships between them. Language has been changed from ‘same sex / opposite sex’ to ‘same gender / different gender’ to be more inclusive of trans people to enable the Bedroom Standard to have the flexibility to adequately meet their needs.

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

- 1) No impact (this does not represent a change in policy).
- 2) Positive impact.

Key borough statistics - sources include:

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

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

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

Marriage and Civil Partnership

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

Information the Marriage and Civil Partnership status of people on the Housing Register is not reported on.

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

1) The proposed allocations scheme makes no distinction between applicants who are married and those who are in a civil partnership.

2) 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?

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 new scheme proposes applying the 'unacceptable behaviour' disqualification criteria across the board, reducing the priority of those who have contributed to their own housing difficulties and introducing a range of anti-fraud measures.

3) The new scheme proposes expanding the 'lower income City worker' preference category to include lower income City residents.

4) The new scheme proposes including decant moves in the allocations process.

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

6) The new scheme implements a priority date system. This allows applicants to keep their waiting time if they move to lower priority group.

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

1) Positive impact. The proposed system offers greater clarity for applicants and greater priority to applicants with the greatest need. A demonstrably fair system will foster good relations between those who are likely to be allocated housing and those who are not.

2) Positive impact. Prioritising those who are good neighbours and do not try to unfairly increase their own priority will foster good community relations generally.

3) Positive impact. It is fair to include alongside City workers those residents who work in a neighbouring borough, those who have lost their job and those who are prevented from working because of age, disability or caring responsibilities.

4) Positive impact. By having one system for allocations and decants, all applicants will be able to see who is getting housing and why, increasing trust and confidence in how the City Corporation allocates accommodation.

5) Positive impact. Applicants will be able to see who is getting housing and why, increasing trust and confidence in how the City Corporation allocates accommodation.

6) Positive impact. Allowing applicants to keep their waiting time softens the impact of a loss of priority and lessens the sense that those with higher needs are 'jumping the queue'.

Conclusion and Reporting Guidance

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

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

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

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

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

This analysis has concluded that...

The proposed Allocations Scheme 2017 would have a number of positive impacts on applicants who share a protected characteristic. By being clearer and fairer than the scheme currently in operation, it will also foster good relations between those who share a protected characteristic and those who do not.

A number of adverse impacts have been identified, however, these are all necessary to achieve wider objectives and appropriate mitigations have been put in place.

1) Increasing the priority of the studio upgrade group could have an adverse impact on tenants under 45 living in a studio. This is necessary because the studio upgrade group does not currently have sufficient priority to achieve re-housing, and is not freeing up enough much needed studio accommodation. The impact on under 45s is mitigated by expanding the category to include couples under 45 and non-resident parents whose children regularly visit overnight. People of any age who require a one bedroom flat for a medical or welfare reason are already in a higher group and this will not change.

2) Resetting the waiting time upon acceptance of a homeless application could have an adverse impact on children, women, pregnant women, people with a disability and White people, who are all overrepresented on the homeless list. This is necessary to manage the supply of temporary accommodation. The impact is mitigated by greatly increasing the priority of homeless applicants after twelve months in temporary accommodation.

3) Adopting a points, rather than bands, system could have an adverse impact on any applicant whose housing needs are less severe. Analysis of overcrowding figures suggests this may include White British and Irish people and people of working age without children. This is necessary to operate a fair system and ensure those with the greatest needs are offered the greatest priority. This is mitigated as, should White British and Irish people and people of working age without children also have severe or complex housing needs, they would also receive greater priority.

4) Requiring 'Sons and daughters' aged between 18-21 to pass an affordability check could have adverse impacts on people in this age group. This is necessary due to changes in national welfare legislation and to prevent the creation of unsustainable tenancies that are likely to end in eviction due to rent arrears. This is mitigated as an affordability check is being implemented, rather than a blanket change in the 'Sons and daughters' criteria. People aged 18-21 who are applying for reasonable preference under the Housing Act 1996, or with a lower income City connection, will also not be affected by this rule.

5) Removing applicants with exceptional support needs from Choice Based Lettings could have an adverse impact on people with disabilities. This is necessary to prevent the creation of unsustainable tenancies that are likely to fail or end in eviction. This is mitigated by meeting with the applicant and their social worker to discuss their preferences for accommodation prior to an offer being made. It also enables those who don't understand or engage with CBL to gain housing too. It is further mitigated by awarding similar, Direct Offer, priority to those ready to move on from supported housing.

6) Use of Personal Housing Plans for applicants with severe housing needs could adversely impact on those less able to understand and implement the advice they are offered, either due to a lack of English, learning disabilities or mental health issues. This is necessary to ensure no opportunity is missed to resolve an applicant's housing

This analysis has concluded that...

needs. Further work will be done to develop a protocol on Personal Housing Plans to ensure they are tailored to individual needs and capabilities.

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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Agenda Item 7

Committee	Dated
Community and Children's Services Committee	13/10/2017
Subject: Update on Rough Sleepers	Public
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report author: Davina Lilley, Manager of Homelessness and Rough Sleepers, Homelessness & Housing Options Team, Community and Children's Services	

Summary

This report articulates our work with rough sleepers to fulfil the City of London Corporation's (the City's) local authority function in accordance with the policy commitments of central government and the Mayor of London. The City continues to be part of a pan-London approach to addressing rough sleeping and is represented at the Greater London Authority's (GLA's) operational leads meeting. The Mayor's Rough Sleeping Group has been replaced with the No First Night Out Tasking Group, which the Assistant Director People attends.

The counts of rough sleepers during the past three months are as follows: May – 30; July – 33; and August – 40. The counts continue to fluctuate but there is a noticeable trend across London that rough sleeping is increasing and it is high in the City. Rough sleeping is driven by a range of factors, many beyond the control of the City. The count does not reflect how long people are on the streets, what their complex needs are or the services they may have received. It is hoped that, as a result of the additional resources agreed by the Committee in July, the numbers will go down.

The City continues to be engaged in four partnership-based projects – Gold Standard, City Lodge, No First Night Out (NFNO) and the Pathway model – that all address rough sleeping.

Updates for these projects are as follows:

- The advice and homeless service has achieved the Silver standard for homeless prevention services, awarded by the National Practitioner Support Service, and is completing the challenges required to achieve the Gold award.
- Work on the City Lodge has now been completed and it was opened in June 2017.
- The NFNO project continues to attract interest on a regional and national level and the project has been extended for another two years with funding from central government.
- Regarding the Pathway model, the City has been negotiating access to accommodation in the adjacent borough and details are in the body of the report.

The outreach contract has now been extended for an additional two years.

Recommendation

Members are asked to

- Note the report.

Main Report

Background

Rough sleepers audit

1. The City outreach team continues to implement monthly audits. It is important to note that the audits are just a snapshot of the number of rough sleepers on the City's streets. They provide an opportunity to gather intelligence about who is actually sleeping out on any given night. The results for the City, as with all inner London boroughs, suggest that rough sleeping has increased between 2016 and 2017.

Month	No.	Month	No.	Month	No.
January 2015	32	January 2016	35	January 2017	31
February 2015	N/C	February 2016	36	February 2017	27
March 2015	39	March 2016	24	March 2017	31
April 2015	27	April 2016	28	April 2017	32
May 2015	25	May 2016	27	May 2017	30
June 2015	22	June 2016	33	June 2017	N/C
July 2015	26	July 2016	31	July 2017	33
August 2015	21	August 2016	29	August 2017	40
September 2015	29	September 2016	25	September 2017	
October 2015	21	October 2016	29	October 2017	
November 2015	48	November 2016*	50	November 2016*	
December 2015	N/C **	December 2016	N/C **	December 2017	

* Official count – the annual counts are reported to the Department for Communities and Local Government (DCLG) to measure local authorities' progress in meeting their targets.

** N/C – no count.

2. More details on the profile of rough sleepers for the first quarter (April to June 2017) is attached as Appendix 1. Key highlights for this period are:

136 people were recorded as sleeping rough, of which:

- 26 were new rough sleepers, a decrease of 50%
- 46 were longer-term rough sleepers described as living on the streets
- 64 were those who return to the streets intermittently.

Although new rough sleeping is reducing, the increase in figures is related to those who are living on the streets or returning to the streets. Comparisons with other boroughs are highlighted in Appendix 1.

Current Position

Member involvement

3. The Members' Rough Sleepers Group has met three times this year. At one meeting, they received a PowerPoint presentation outlining access to accommodation for City rough sleepers. It was noted that the City can only access limited accommodation. Officers were requested to do additional work on this and to bring it to the next meeting. This work was completed and was presented to the Court of Common Council, Policy and Resources Committee and the Community and Children's Services Committee. The outcome was an increase to the baseline budget. Further details on the accommodation pathway are included in this report.
4. The group also reviewed the report on the outreach contract and agreed with the recommendation of the Departmental Leadership Team (DLT) that the contract continue subject to changes in how the service is measured. The group requested that the new proposed outcome measures are presented to the next meeting for their agreement.
5. It was noted that the bed at Anchor House that had been commissioned by the City was being used.

City Lodge

6. The City Lodge is now completed and guests started to move in on 12 June. There is to be an official opening on 28 September 2017.

Pathway model

7. As already mentioned, the Homeless budget has increased by £197,000 for the rest of the financial year and £400,000 for 2018/19. This has enabled officers to approach other boroughs to purchase bed spaces. The diagram below illustrates where the bed spaces are and the associated costs:

Provision	Stage	Unit cost per annum	Proposed no. of beds	Proposed cost 2017/18	Proposed cost 2018/19
King George's Hostel Westminster	First stage: high support for men with chaotic Class A drug use	£9,226	2	£9,226	£18,452
Edward Alsop Court Westminster	First stage: men aged over 50 with complex needs	£6,103	2	£6,103	£12,206
Dellow Centre Tower Hamlets	First stage: medium support	£8,000	4	£16,000	£32,000
Great Guildford Street Hostel Southwark	Assessment/ emergency beds: short stay	£3,000	5	£7,500	£15,000
Mare Street Hackney	First stage: complex needs	£9,600	1	£4,800	£9,600
Pop-up hub	Direct access	£13,000 per hub	10 per night	£26,000	£52,000
Total				£69,629	£139,258

Beds at Great Guildford Street and Dellow Centre are full. There have been four referrals to King George's. One client at King George's is a young ex-care leaver who is a very chaotic drug user and has been on the City streets for five years. This is the first time he has engaged with workers and is currently scripted. This is a really positive outcome and wouldn't have happened if we hadn't purchased the bed. There are referrals to Edward Alsop Court and we are just waiting for a vacancy.

Money has been allocated for Pop-up hubs: two for this financial year and four for the next financial year.

Other costs

Housing First:

The paper for the Housing First model has been approved by Housing. A client has been identified and the support package is in place. We are waiting for a studio, hopefully on Middlesex Street.

Private rented sector (PRS) access scheme:

This will be offered as an alternative to City social housing. Currently, the model is that the client has to find the accommodation and then certain documents from the landlord have to be obtained to demonstrate that they are compliant with gas, electrical tests etc. The package usually comprises about £1,000 deposit and one month's rent. A sum of £20,000 is available for this year. One client has already taken up the offer and has relocated to his family in the North of England.

Additional support services

A range of additional services will support the outreach teams to deal with those who require specialist professional intervention:

- Specialist mental health worker
- Outreach welfare specialist
- Detox and rehab treatment pathway
- Pause has been identified as a specialist agency to work with one of our most complex clients with a history of multiple pregnancies and complex drug needs.
- Parkguard has been approached and in principle has agreed the process of discussing the finer details of Parkguard pilots. It is hoping to start in September.
- The winter awareness campaign will run in December.

Pop-up hubs

8. The team in partnership with the police ran the first Pop-up hub in 18 months during the third week of September 2017. The hub was located at St Botolph's Aldgate, and had five police allocated. The hotel next door provided towels and toiletries.

It has been a huge success with some very positive outcomes:

- 17 people accessed the hub.
- 3 reconnected to other boroughs.
- 3 referred into accommodation.

- 1 reconnected to rehabilitation placement in Suffolk.

It is hoped to run another one soon, maybe in partnership with Tower Hamlets to target rough sleepers who oscillate between the two boroughs.

No First Night Out project

9. Since the last report to the Committee, additional staff have been employed for the NFNO project: a Project Manager and a Pathway Co-ordinator. The project will continue to run for approximately 18 months. The partnership, including the City, was involved in presentations at two national conferences in the summer.
10. The project has attracted attention for its pioneering model in that it tries to identify people at risk of rough sleeping via housing options, libraries, Jobcentre Plus, local day centres and advice services. During its pilot year 2016/17, 277 referrals were made to the case workers of which 98 were accepted onto the caseload, 68 were offered emergency housing solutions and 47 went on to longer-term housing solutions. A key partner in finding housing solutions has been Crisis, which offers a private landlord scheme. In total, 17 people have secured tenancies through this scheme.

Going for Gold

11. The Homelessness team has now achieved the Silver standard and was awarded this at the National Practitioner Support Service national conference in July. The team has completed two challenges towards the Gold standard. The City is the second borough to achieve this in London.

Corporate & Strategic Implications

12. The aim of reducing the number of rough sleepers in the City links directly with the Inclusive and Outward Looking City theme of the Community Strategy as well as the Housing Business Plan.

Implications

13. There are no financial, legal, property or HR implications.

Conclusion

14. The work with rough sleepers continues to be challenging; however, there have been some real successes, none of which would have been achieved without the partnership approach with St Mungo's, the City of London police and other departments within the City of London. The buoyancy of the numbers identified in the counts continues to be a concern, and we are constantly reviewing the impact of the different methods we use to address the issue and trying new approaches.

Appendices

- Appendix 1 – April – June 2017 Rough Sleeper Performance Report

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Period: April – June 2017

Summary

- During April to June 2017 the number of rough sleepers in the City of London decreased to 136 people (7%) compared to the previous quarter. This compares to a 6.1% decrease across London as a whole.
- The number of new rough sleepers decreased substantially by 50% from 52 to 26 people when compared to the previous quarter. However this drop is mainly due a change in reporting.
- 69% of new rough sleepers spent just one night sleeping rough, this is lower than previous quarter (75%) and lower than the London average of 80%.
- The City also has a significantly higher proportion of longer term rough sleepers (34%), this compares to 14% across London as a whole. The City also has higher number of RS205, people identified as being the most entrenched rough sleepers with 10 people. However only one new rough sleeper joined living on the street cohort.

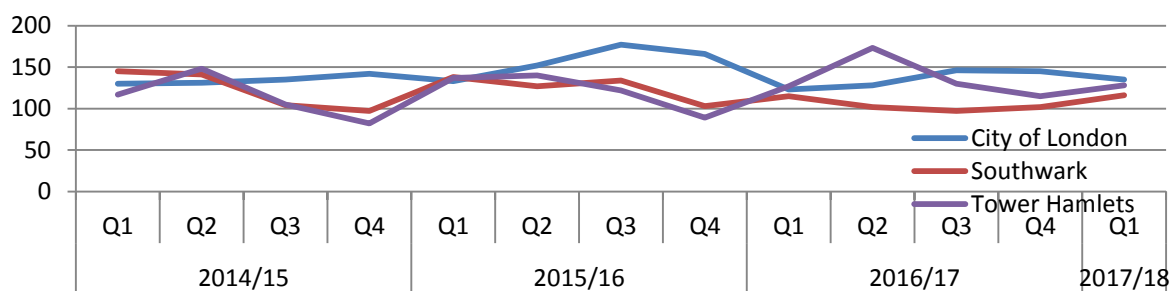
2 Total rough sleeping

During the period 1 April to 30 June 2017 a total of 135 individuals were recorded sleeping rough in the City of London. This is a decrease of 10 people from the previous quarter (7%), this compares to a 6.1% decrease in the overall total number of rough sleepers (2,584) across London, from the previous quarter.

The graph below compares the City of London to Tower Hamlets and Southwark these local authorities have a similar scale of rough sleeping. Southwark reported 116 rough sleepers in the quarter and Tower Hamlets reported 128.

In Southwark, the total number of rough sleepers increased by 13.7% and in Tower Hamlets increased by 11.3% on the previous quarter.

Graph 1: Number of Rough Sleepers

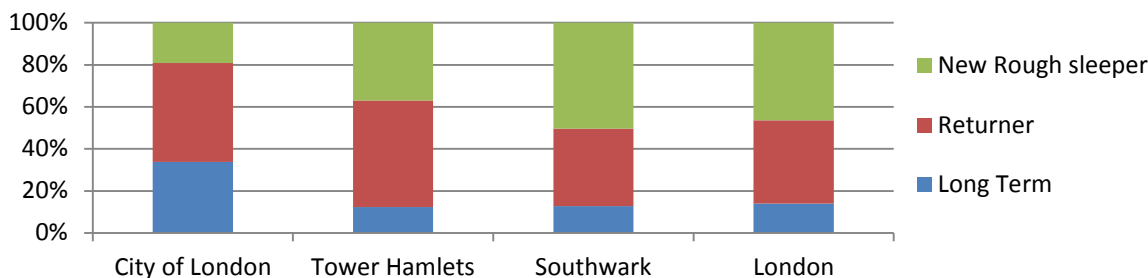


As exemplified in graph 1, the number of rough sleepers tends to fluctuate between the quarters.

The 135 people recorded sleeping rough in the City during the quarter can be broken down as:

- 26 people (19%) were new rough sleepers
- 46 (34%) were longer term rough sleepers described as living on the streets
- 64 (47%) were those who sleep rough intermittently have returned to the streets – either from accommodation or having spent a period outside of London

Graph 2: Composition of rough sleepers in 2017/18 Q1



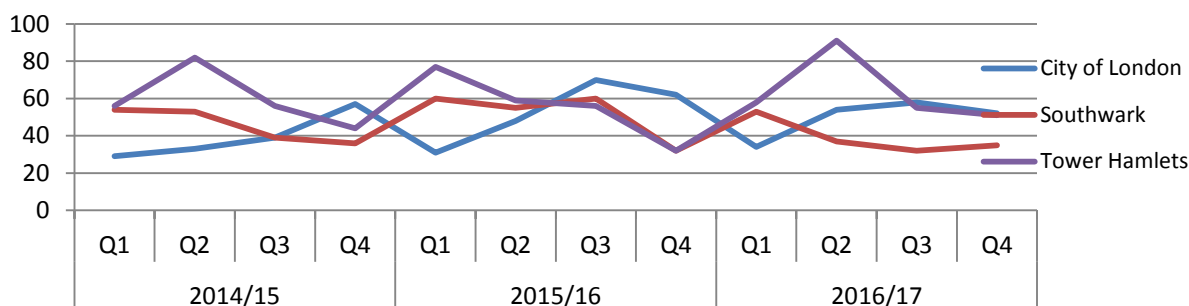
The graph above shows that for this quarter the City of London has much higher proportion of longer term sleepers, compared to its neighbours and London as whole. This composition is explored in more detail in the next three sections.

3 New rough sleepers

During the last quarter there was a 50% decrease in the number of new rough sleepers from 52 people to 26 people. This is also a 24% decrease from the same period last year. The drop is mainly due to having more robust checks in the how rough sleepers are being counted; previous quarters may have overestimated the number of new rough sleepers.

Across London as a whole there was a 12% decrease in the number of new rough sleepers in the past quarter.

Graph 3: Number of New Rough Sleepers

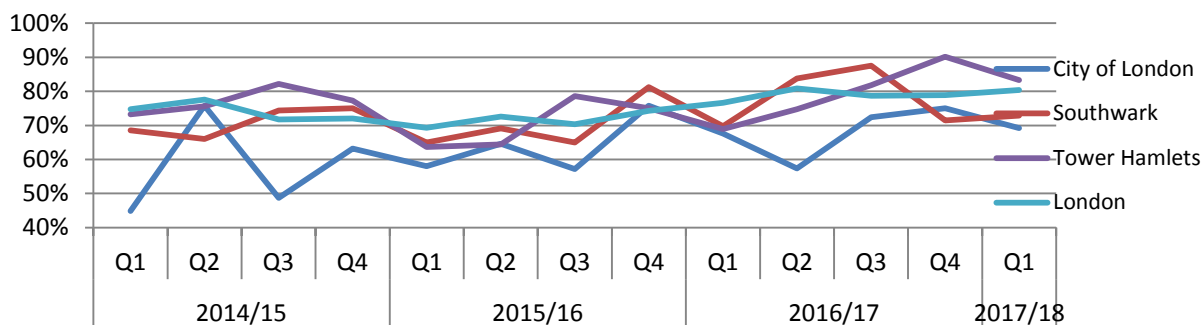


Tower Hamlets saw a decrease in the number of new rough sleepers by 6% but Southwark saw an increase of 69%.

Of the 26 new rough sleepers recorded in the City,

- 18 (69%) spent just one night sleeping rough
- 7 (27%) spent more than two night but not living on the streets
- 1 (4%) joined living on the streets

Chart 4: Percentage of new rough sleepers not spending a second night out



69% spent just one night sleeping rough; this lower than the previous quarter 75%. Across London 80% of new rough sleepers spent just one night out, in Tower Hamlets the proportion was 83% and in Southwark 72%.

Living on the streets (longer term rough sleepers)

The total number of people (46) recorded living on the streets increase from the last quarter (42 people), but fell from the same period last year by 8 people. The number of longer term rough sleepers is also considerably higher than its statistical neighbours, Tower Hamlets (16 people) and Southwark (15 people).

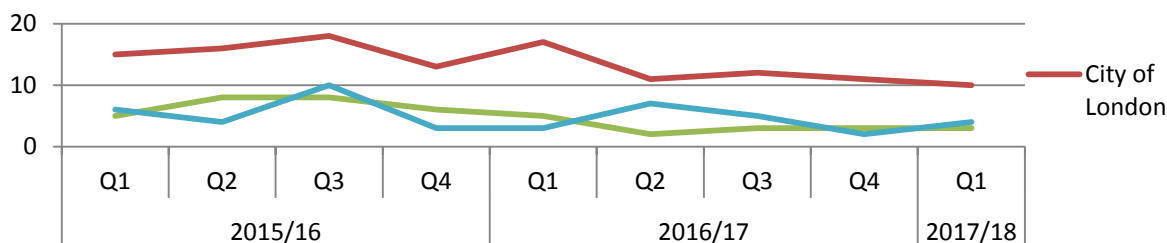
Table 1 Number of longer term rough sleepers

	Q1 2017/18	Change from last Quarter	Change on same period last year
City of London	46	4	-8
Tower Hamlets	16	7	1
Southwark	15	-2	1
London	362	-15	-27

Graph 2 shows that City of London has a higher proportion of longer term rough sleepers (34%). This compares to 14% across London as a whole, and its statistical neighbours Tower Hamlets (13%) and Southwark (13%)

Of those living on the streets 10 are identified among London’s most entrenched rough sleepers (known as the RS205). Of which one person was a new rough sleepers. Graph 3, shows although the City of London has a higher number of RS205 compared to its statistical neighbours, this number has fallen since Q1 2016/17 (17 people).

Graph 3: Number of RS205



Intermittent rough sleepers (returner)

During the period 64 people recorded rough sleeping in the City had done so having returned to the streets after a period away. Southwark reported 43 intermittent rough sleepers in the quarter and Tower Hamlets reported 66.

In the City the number of intermittent rough sleepers increased by 23% compared to the last quarter. This increase is mainly due to having more robust checks in the how intermittent rough sleepers are being counted.

Tower Hamlets has also seen an increase in the number of intermittent rough sleepers 22%. In Southwark, there has been a drop of 10%.

Across London as a whole there was a 0.5% decrease in the number intermittent rough sleepers in the past quarter.

38% of this group had one contact, and further 23% had two contacts. London wide 50% of intermittent rough sleepers were seen just once. In Tower Hamlets 45% and Southwark 53% were seen once.

The proportion of City rough sleepers recorded as intermittent (47%) is higher than that of London as a whole (at 40%). In Southwark 37% of rough sleepers are intermittent, and in Tower Hamlets

Agenda Item 8

Committee(s)	Dated:
Community and Children's Services Committee	13/10/2017
Report of: Andrew Carter, Director of Community and Children's Services	Public
Report author: Theresa Shortland, Head of Service – Education and Early Years	For Information

Summary

The Community and Children's Services Committee was updated on 14 October 2016 after the May 2016 publication of a new Ofsted/Care Quality Commission (CQC) Inspection Framework for the provision of Special Educational Needs and Disabilities (SEND). The purpose of this report is to provide an update on the work with children and young people with SEND in the City of London (CoL) since the last report was presented to the Committee.

A review of SEND in the CoL was undertaken in October/November 2016 by an external consultant and recommendations were made on areas for improvement. A further review took place by the same consultant in July/August 2017. The review in July/August 2017 confirmed that:

- An updated SEND strategy and action plan is now in place
- Statutory requirements in respect of Education, Health and Care (EHC) plans for children with SEND are being met
- CoL had 100% performance in meeting timescale requirements to complete assessments for EHC plans
- A SEND Programme Board had been established with wide partnership engagement
- A Parent Forum had been established, and parent engagement is evident on the SEND Programme Board
- The Local Offer for services for children and families was on track to be launched in October

Recommendation

Members are asked to:

- Note the report.

Main Report

1. Background

1.1 The duties on local areas regarding provision for children and young people with special educational needs and/or disabilities (SEND) are contained in the Children and Families Act 2014. The Ofsted/Care Quality Commission (CQC) Inspection Framework sets out the legal basis and the principles of inspection. The Minister of State for Children and Families has tasked Ofsted and the CQC with inspecting local areas on their effectiveness in fulfilling these duties.

2. Current Position

2.1 Since October 2016, the focus of the City of London's (CoL's) work on SEND has been to continue to embed the reforms that are derived from duties under the Children and Families Act 2014 and preparing for an area-wide joint inspection by the CQC and Ofsted.

2.2 *SEND strategy and action plans:* The SEND Joint Strategy 2017-20 and Terms of Reference were approved at the SEND Programme Board in May 2017. These are appended (Appendices A and B). The three-year Strategic Plan outlines the governance and priorities for 2017-2020. The priorities for the work streams are set out in the SEND action plan 2017-18. These were approved at the SEND Programme Board in September 2017.

2.3 The strategic priorities for the SEND work in 2017-18 are incorporated across all six work streams. These are:

- Co-production and participation: at strategic, operational and individual level with parents/carers and children and young people.
- Outcomes: their definition, audit and measurement of impact – including the development of standard metrics for measuring impact against outcomes across education, health and social care.
- Integration of services: assessing needs and commissioning provision to offer seamless support to children, young people and their families and ensuring good value for money.
- Preparation for adulthood: identification of appropriate and relevant outcomes and provision that are most effective to prepare young people for adulthood.

2.4 A logistics plan is in place in preparation for the Area Inspection. There is a body of evidence collected in the SEND library. This has been updated and reviewed following an external review in July/August 2017, along with an update of the Self-Evaluation Form (SEF). These will be reviewed and updated every quarter from September 2017.

2.5 *EHC plans and SEND support*: In the CoL, there are currently 16 children/young people who have an Education, Health and Care (EHC) plan, approximately 0.8% of the population of resident children. The age range is 4–24 years old, with 15 males and 1 female. All children with an EHC plan or a statement attend schools which are rated Good or Outstanding by Ofsted.

2.6 *Local Offer*: The Local Offer aims to increase access to services for parents and carers of children with SEND. Local authorities should publish a local offer, setting out in one place information about provision they expect to be available for children and young people in their area with SEND.

2.7 It also requires the increased engagement and participation of young people and families so that they have greater choice and control, are listened to and their concerns are resolved swiftly. Staff have worked with children, young people and their families to redesign the local offer in the CoL. Over the past year, the SEND parent forum has worked with officers to develop and design a new website. The new Local Offer is up to date and it is easy to access and find information. The revised Local Offer is being launched at the end of September 2017.

3. Conclusion

3.1 There has been good progress in the development and quality of work with children and young people with SEND in the CoL. Plans are in place to continue to focus on improvement and preparation for the Area Inspection.

Appendices

Appendix A – Community and Children’s Services. 14 October 2016.
Special Educational Needs and Disabilities (SEND) Inspection Framework and CoL Draft SEND Strategy
Appendix B – City of London SEND Programme Board – Terms of **Reference**

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Appendices

Appendix A

City of London Corporation

Special Educational Needs and Disability Joint Strategy 2017-2020



Contents

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How to use this strategy

The SEND Strategy sets out the City of London Corporation's ambitious vision for children and young people with SEND and describes the journey we need to make to achieve this vision. It follows the previous plan which is the SEND Strategy Action Plan (2013–2017). The strategy should be read alongside the 2017 SEND Self-Assessment and 2017 SEND Action Plan.

- The 2017 SEND Self-Assessment is a tool for us to use to assess where we are on the road map, how far along the road we have travelled and how far we have to go.
- The 2017 SEND Action Plan sets out the things we need to do to if we are to achieve our vision.

How does this strategy fit with the work of the City of London Corporation and its priorities?

The City of London Corporation's vision for children and young people is to ensure that:

“Every child and young person enjoys a safe and healthy lifestyle. They will be able to access a high-quality education provision to achieve their maximum potential in order to thrive in their community. They will be supported by a skilled and confident workforce.”

The health, wellbeing and achievement of children and young people with special educational needs is a very high priority within the Children and Young People's Plan (CYPP) and within the Health and Wellbeing Strategy. The CYPP priorities are as follows:

Priority 1 – SAFEGUARDING AND EARLY HELP

Children and young people in the City are seen, heard and helped, they are effectively safeguarded, properly supported and their lives improved by everyone working together.

Priority 2 – CLOSE THE GAP FOR VULNERABLE GROUPS

Every child and young person in the City has the right to educational attainment, participation, confidence, health and wellbeing. We identify and provide early support and help for particularly vulnerable groups in the City to ensure they are able to have every opportunity to succeed, regardless of their background.

Our vision

Our vision describes the way we want to be, now and in the future.

The City of London is a place where children and young people with special educational needs, disabilities, mental health conditions or other long-term medical conditions can **thrive**.

We identify developing conditions, difficulties and needs at the earliest stage and make it straightforward for children and young people's families to assess what help may be required.

We get the balance right between protecting our most vulnerable children from harm and empowering them to take appropriate risks and respond to challenges as they develop to build skills, understanding and self-confidence alongside their peers.

We work seamlessly with our partners to provide high-quality, easily accessed services and opportunities that promote physical, mental and emotional wellbeing and development and break down the barriers that make achieving their hopes and ambitions hard.

Our children and young people are confident that they are highly valued, equal to all of their peers, and have high expectations for their futures.

Our children and their families know where to turn, what is available and how to get services for themselves or their children; they feel understood, involved and supported at all times.

Our children and young people with SEND have excellent long-term life outcomes. Each fulfils their potential and achieves their goals.

Where are we now?

The City of London Corporation is the smallest local authority area in London. Its population of children with SEND is also small and, partly because of this, our families have enjoyed well-resourced, tailored services and a stable team of professionals, some of whom have worked with the children and young people for many years. We are deeply committed to maintaining the quality of services and the strength of our relationships as we move forward and make improvements.

Across the country, SEND reforms which came into force in 2014 changed the expectations of children, young people, families and professionals about the way in which they should work together. The City was well placed to introduce these reforms as its small numbers lend themselves to close and harmonious working relationships between professionals and with families.

Since the introduction of the SEND reforms, the City of London Corporation has introduced a number of changes. All former Statements of Special Educational Needs have been transferred to Education Health and Care Plans with the full engagement of the children, young people and their families. All statutory assessments are completed within 20 weeks of commencement (the legal timeframe) compared with 59% nationally and 70% in London as a whole, and the City of London Corporation has completed the transfer of all Statements (of Special Educational Needs) to Education Health and Care Plans, well in advance of the national deadline of 1 April 2018. An Education Health and Care Plan has also been issued for a young person who previously had a Learning Difficulty Assessment. This was well in advance of the legal deadline.

Many of our schools and settings have been providing excellent services and support to children and young people with SEND and their families. City-wide SEND audits during the early part of 2016 confirmed this. We are not yet at a point where we can provide a City-wide picture of how all our children and young people with SEND are progressing or confirmation of the outcomes they are securing.

We need to understand much more about all of these children and young people to make sure they have the high-quality services they need and that they themselves are satisfied and know how to seek support and advice as needed. With no legal authority over most of our schools and settings, achieving this goal is highly dependent on the quality and effectiveness of partnership working in the City.

There is a very high satisfaction rate among our families, and most children and young people with an Education Health and Care Plan enjoy a

comprehensive suite of services and feel they have their needs well met. Parents meet together with City of London Corporation officers regularly and children often come too. However, within parents' feedback there is a sense within a small number of families of reliance on the City, of 'not knowing what it is they don't know' and wanting to be able to find out more for themselves. We need to do more to make information accessible, to highlight opportunities and to facilitate participation to enable this.

The City of London Corporation's published **Local Offer** (everything that is offered to children and young people with SEND and their families at a local level) is factually accurate and has a comprehensive level of content but can be difficult to navigate and needs children, young people and their families to critique it and make it more attractive to use. More importantly we need our Local Offer to be designed by our children, young people and their families. To this end, we have begun work with our young people, put our services under their close scrutiny and asked for their help in redesigning the website.

The Local Offer can be found here:

<http://localoffer.fyi.gov.uk>

Families tell us that they experience good multi-agency working. Often this means they have a close relationship with one agency or individual within an agency who then acts as a gateway for other agencies. However, working in partnership across agencies can have its challenges in the City. The City's children receive their healthcare services through either the Tower Hamlets CCG or the City and Hackney CCG, so the City of London's partnership with both CCGs is equally important. We need to do more to strengthen integration of services.

Because of the size of the City's resident population, joint commissioning activity needs to be reframed to specifically meet the needs of the City's children, particularly where there is a joint commission of services targeting large numbers of children across two boroughs. New governance arrangements and multi-agency participation at SEND Implementation Boards will create a new paradigm in which the voice of the *City* child is the first voice in all that we do.

We have recently established a multi-agency Transitions Forum within the City to make sure that young people who have received services as a child have their future needs as an adult assessed long before they become one. This enables a fresh assessment to be made in which the young person's needs

are central, the securement of resources, continuity of service where required, and an early introduction to any new professionals and services before the current ones stop supporting the young person and their family.

The legal framework

The Children and Families Act, 2014 has established a clear programme of SEND reforms which have made best practice in services a set of robust requirements:

- a person-centred, joined-up approach to identifying and meeting the needs of children, young people and their families;
- increased engagement and participation of young people and families so that they have greater choice and control, are listened to and their concerns are resolved swiftly;
- a published Local Offer of support, services and provision, how to access it and how to raise concerns or seek redress;
- the use of effective practice, data and wider intelligence and independent assessment to drive improvement;
- clearly defined and understood roles and responsibilities;
- increased integration of services and joint commissioning across the LA and Health.

This legislation sits in the context of the **Equality Act 2010**

Public bodies must adhere to the General Duty and the Specific Duties of the Equality Act 2010.

General Duty

In the exercise of functions, due regard must be given to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and those who do not;
- foster good relations between people who share a protected characteristic and those who do not.

These are sometimes referred to as the three aims/arms of the general equality duty.

Due regard for advancing equality involves:

- removing or minimising disadvantages suffered by people due to their protected characteristics;
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people;
- encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately

low.

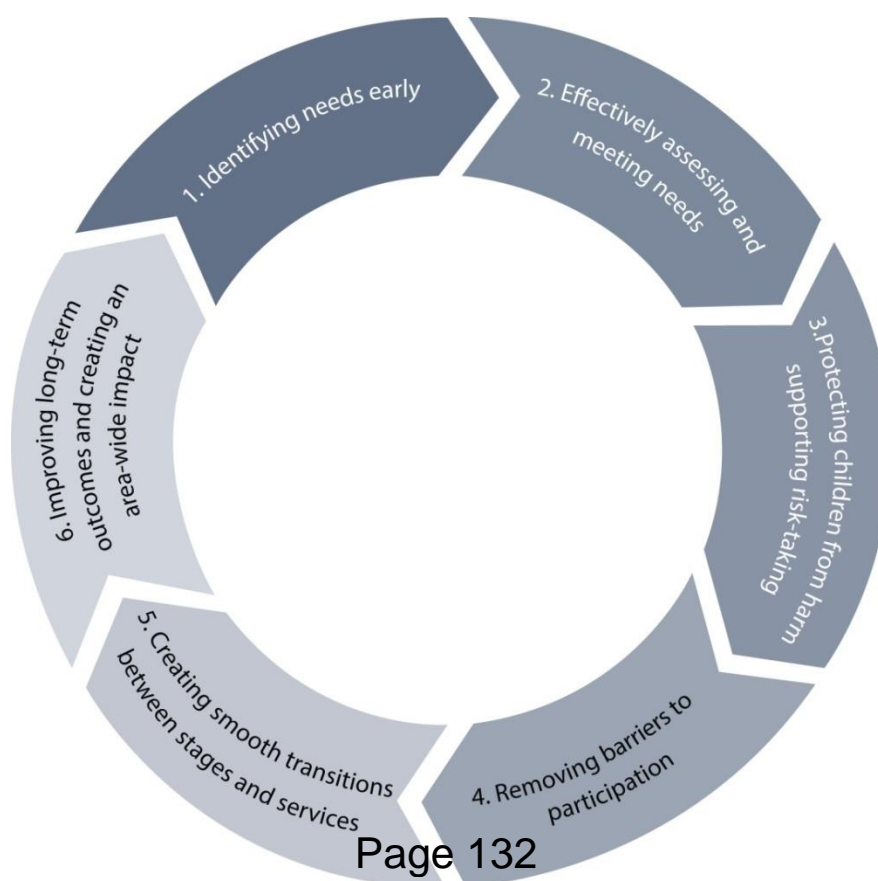
Specific Duty

- Information about how disabled people have been involved in its development.
- The authority's methods for undertaking impact assessments.
- An action plan setting out the steps it will take to meet the general duty.
- Arrangements for gathering information on the effect of the authority's policies and practices on disabled people.
- Arrangements for using this information, including reviewing the effectiveness of the action plan and preparing subsequent disability equality schemes.

Information about how disabled people have been involved in its development:

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- Arrangements for using this information, including reviewing the effectiveness of the action plan and preparing subsequent disability equality schemes.

Our six priorities



Our six priorities

Our six priorities are about the things we need to do very well. The 6 priorities represent a cycle of support:

1. Identifying needs early

- Equipping professionals with the skills and knowledge to recognise needs early, know what resources are available, what process to follow and provide support and advice to families from the outset
- Helping our families to know how to access services independently, make a contribution and challenge our thinking

2. Effectively assessing and meeting needs

- Timely, skilful and multi-disciplinary assessments of need leading to ambitious and meaningful plans
- Gathering benchmarking data across all schools and settings to compare the educational and other outcomes for children and young people with SEND and developing action plans as required

3. Protecting children from harm, supporting risk-taking

- Training our children and young people how to respond to a risk to their safety
- Ensuring all young people have sexual health training
- Making sure education health and care plans provide suitable challenges and opportunities to take appropriate risks
- Assuring ourselves of the safety of the school (and other) environments where our children and young people are placed

4. Removing barriers to participation

- Working with all major stakeholders within the City of London to actively remove barriers to participation, including physical barriers, informational, communicational or attitudinal
- Supporting families creatively with short breaks that increase children and young people's opportunities
- Mystery shopping venues and building a reliable information bank of accessible venues and activities
- Creating a queue jumping pass for families who cannot wait in line for long
- Developing a working group for improving playground design

5. Creating smooth transitions between stages and services

- Preparing for change with each of our children and young people at key stages
- Ensuring all the pieces are in place before asking a child or young person to make a transition
- Preparation for adulthood for all vulnerable children and young

people

- Undergoing formal transition assessments in preparation for adult care services

6. Improving long-term outcomes and creating an area-wide impact

- Securing excellent long-term life outcomes through challenge, support and opportunity
- Monitoring and accounting for outcomes; using performance data to measure impact and inform re-commissioning

Priority 1 – Identifying needs early

At the start of 2016, we conducted SEND audits to find out more about the quality of services across the City's educational and early years settings. Most audit reports show positive work and good levels of skill and understanding. In March we commissioned an Area SENCo to work in all early years and educational phases and regardless of their legal status. Since that time, specialist advice through the Area SENCo has been provided at all schools and settings and sponsorship to enable school/setting-based SENCo staff to qualify has been provided. Targeted training in identifying SEND has been provided for all schools and settings.

City of London Early Help Services brings professionals from all agencies together regularly to discuss early identification of need and strategies to support families and children. This is known as the MAPF (Multi-Agency Practitioner Forum). With such a small cohort of children this allows partners to work seamlessly together and agree the right package of support.

A new year-long programme for the under-fives – 'Little Movers in the Big City' – is being delivered across early years settings which develops gross and fine motor skills towards accelerated and improved cognitive development. One of the aims of this programme is to identify the signs of need through the course of the year.

Web pages for professionals that provide specialist advice and training, access to policies and strategies, changes in legislation and updates on performance will be rolled out during 2016/17. Online SEND training resources including videos are currently being developed for City early years and education professionals.

Priority 2 – Effectively assessing and meeting needs

Most children and young people with additional needs (93%) in the City are supported through SEN Support which is provided directly by their school or early years setting. When a child or young person is identified as having an additional need that requires specialist input, resources or support, and following an assessment, they are often entitled to an Education Health and Care Plan (EHC Plan) which sets out the services that have to be provided for them. At the heart of this Plan are the child's or young person's own wishes. The Plan is reviewed every year to make sure that, as things change, the Plan reflects this. The law sets out some timeframes for assessing children and young people's needs and then reviewing them. The City of London Corporation exceeds these legal requirements as is shown in the Self-Assessment. But there are bigger challenges which go beyond statutory duties and take us on a path to outstanding services.

We want to be fully confident that all children and young people who might need a statutory EHC assessment are receiving one. To gain this confidence, we need to work closely with the independent schools and settings as well as our one maintained school to build skill expertise and understanding in SEND and how to commission an assessment.

We also need to up-skill parents to learn more about the assessment process, who to contact and how to get support. We want all EHC Plans to genuinely reflect children and young people's wishes and aspirations and to hear first-hand if things are not working for them or they want things done differently. A new programme of work to speak directly with children and young people began in August 2016 which includes one-to-one engagements with children and young people with EHC Plans.

We know a lot about the progress and achievements of the children with SEN Support at Sir John Cass Primary School but very little about those at the independent schools. We want to know how they fare when compared with their peers and whether there are services we could provide to support them.

If and when a child or young person's needs change, we need to be able to step up or step down services, provide additional support or resources.

Priority 3 - Protecting from harm, supporting risk-taking

Research shows that children and young people with special educational needs and disabilities can be more vulnerable to abuse than their peers and 70% of school exclusions are for a child with some form of SEND. The exclusion rate alone means that there is a more widespread risk of harm to these children and young people.

We will make rigorous checks of all the schools that our children and young people attend to make sure that safeguarding practices are of the highest standard. We will also ensure that staff in the organisations

We will make sure individual young people have access to sexual health training as part of their entitlement as they transition to adulthood. We will put in place checks to make sure young people know how to both protect themselves from risk and report incidents where they feel uncomfortable with the behaviours of others.

We will offer them independent advocacy through Action for Children and where there are specific communication needs, specialist agencies that will support the child or young person. We will work with our Parents Forum to make that sexual health and safeguarding are part of the regular dialogue and that appropriate training and support for parents is provided so that they have the confidence to support their children through this sensitive area.

At the same time, a children and young people with SEND can also be over-protected in society and this is something that can concern and frustrate young people as they get older because they feel it limits their opportunities to fulfil their aspirations. We must not remove all risks from our children and young people with SEND as normal risk taking will enable them to acquire life skills which will create resilience and self-assurance allow them a greater degree of independence as they get older. This means managed and appropriate risk taking must be considered part of every young person's entitlement. We will raise also awareness amongst parents groups and with schools and help them to develop skills in supporting young people to take risk and build resilience.

Priority 4 Removing barriers to participation

A child with SEND is a child first with many aspects to their identity, their own hopes and dreams and a need to develop as an individual. We are committed to making sure that our children and young people are able to access all the opportunities that are available to their peers, and to participate in society on their own terms. This means we must reduce and remove barriers to their participation where they exist. These barriers may be:

- physical – services/facilities are not made sufficiently accessible to be able to be used;
- communication/informational – methods of communication are not accessible, including accessing enough information about accessible services;
- attitudinal – other people's attitudes, their limited understanding of people's needs and/or poor training make participation difficult or impossible.

Over recent years, because of the requirements of the Disability Discrimination Act 1995 and then the Equality Act 2010, awareness of what barriers are has increased a great deal. Many barriers have already been removed and accessibility has improved because of this understanding. The confidence of disabled people to participate has perhaps not increased at the same rate and there is a gap between the steps already taken and genuinely equal participation. We need to close that gap.

Our families and the young people themselves tell us they find it difficult to socialise in the City. They feel there are too few children with SEND for them to have a sense of belonging and that there isn't enough for children and young people to do, particularly older children. We must change this.

Steps to take are:

- identifying what steps remain to remove barriers created by organisations or individuals;
- working with our families with children with SEND and in particular the children and young people themselves to mystery shop City of London facilities to understand their real experiences and what can be improved;
- working with partners and providers to understand the user experience and increase opportunity to participate;
- focusing our attention on the 'whole child', exploring the things they want to do and see, and how they wish to develop so that we can find activities, groups and opportunities that match;
- building confidence in participation by phased introduction to new activities and opportunities.

Priority 5 - Creating smooth transitions between stages and services

We know that change is difficult for everyone but particularly difficult for children with SEND and their families. We understand the anxiety for families when they faced with the prospect of having to re-start the process of creating understanding of their children's needs and making sure that they are met and we understand that for the children and young people themselves, moving schools or changing services can feel overwhelming and leaving safe, accessible and familiar environments can feel like loss and be distressing. We will work hard to provide continuity in people and places and where change needs to happen, for example in transferring schools, we will work closely with families well in advance of the transition and make sure it goes well. This means:

- Agreeing what needs to change and what needs to stay the same with the young person and their family
- Making sure that everything is in place in the new setting or service before it is required, Making sure those involved know everything they need to be able to provide the correct support
- Trial runs and acclimatisation as necessary
- Following through to make sure everything is running smoothly

Every young person is entitled to have their transition to adulthood supported through an assessment of their needs in which their voice is clearly heard and their wishes are paramount. The package we will consider includes:

- advocacy
- independent travel training
- work experience
- training/FE/HE education options
- career coaching
- independence skills training
- personal budget
- sexual health
- Undergoing formal transition assessments in preparation for adult care services

Some young people will be entitled to a formal transition assessment to make plans for their transition to adult services. These transition assessments will be considered from the point that the young people concerned turn 14, at a point when they have relative stability in their lives and can think about their future aspirations. The views of the young person themselves will be central to the assessment.

Priority 6 – Improving long-term life outcomes

Planning early for and with our children and young people is critical to securing high-quality life outcomes. We need to encourage our children and their families to be ambitious, set challenging goals and aspire to great futures. As professionals, we need to wrap around the goals and put things in place that make those aspirations a reality for every child.

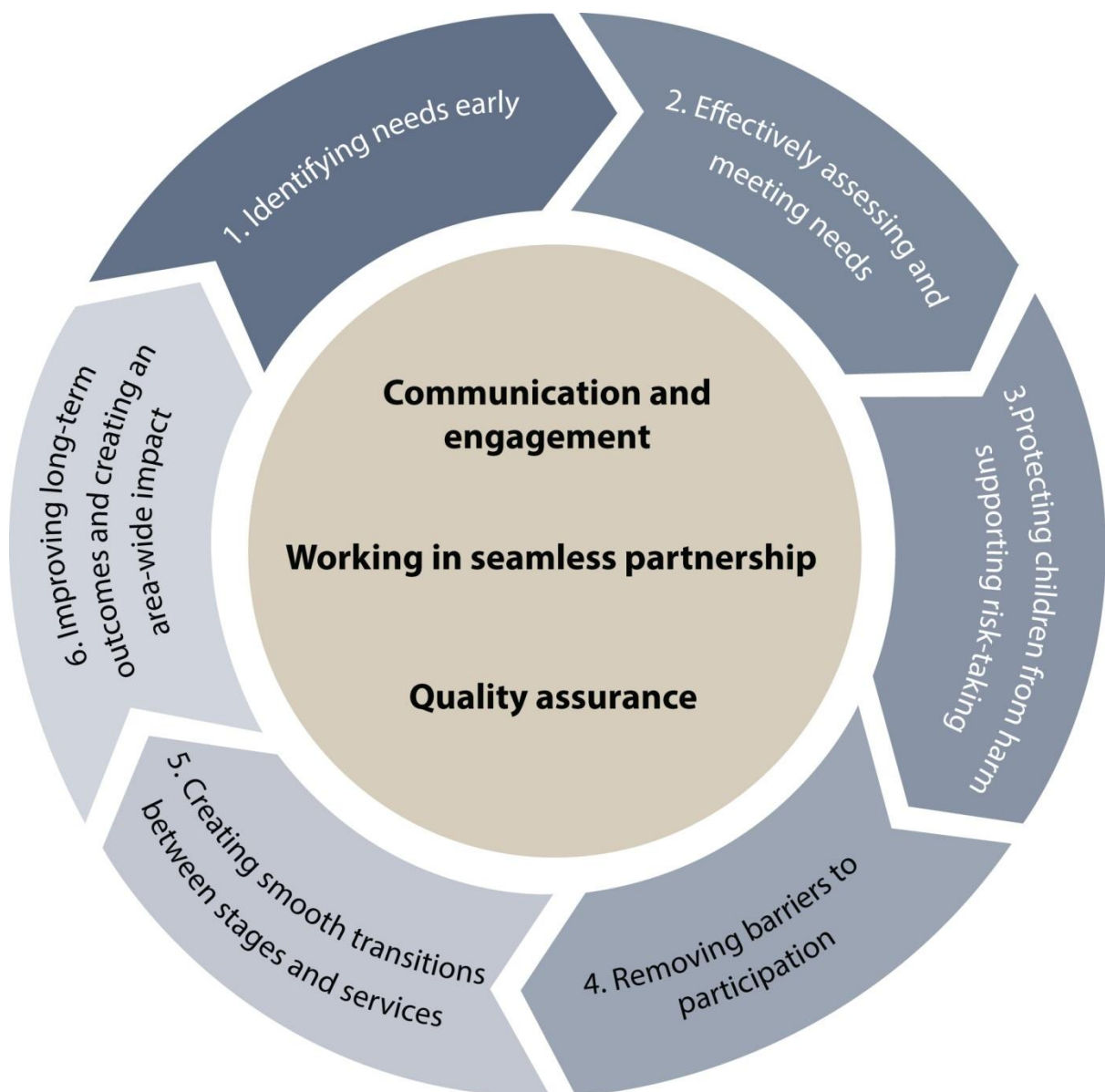
If we want our children and young people to have high aspirations, we must be ambitious for them; we need to broker opportunities that change their horizons, and build their confidence to fully participate in the activities that they find fulfilling. And we must never lose sight of the fact that there are many aspects other than disability status that make up social identity – we need to enable our children to celebrate all of them.

We will measure and account for the outcomes of all aspects of our SEND work to ensure that we are having the right impact

Our three critical behaviours

We know that the way in which we do things is every bit as important as what we do.

These are the three ways of working which underpin our culture and affect the way in which we deliver on our 6 priorities. These are our critical behaviours.



1. **Communication and engagement**

- Communicating in a way that is accessible, meaningful and easily

understood – always

- Communication and engagement with children, young people and their families; making sure their voices are the first voices in everything we do
- Getting to know the children who don't have a plan – listening to their expert views, giving them a leading role in the way we do things
- Providing a rich information and guidance resource for children, young people, their families and professionals through the Local Offer

2. Working in seamless partnership

- Working in seamless partnership across agencies to create a suite of joined-up services that can be easily understood and navigated
- Introducing mechanisms to better co-design our services with our children and young people and empowering them to shape their own futures and the future of our services

3. Governance and quality assurance

- Developing new governance arrangements to evaluate the quality of services.
- Inviting our families to hold us to review their services, set the agenda and hold us to account
- Regularly seeking third party review

Critical Behaviour 1 - Communication and engagement

Our work on communication and engagement is far reaching. It encompasses:

- providing accessible information for our children, young people and families to enable them to access all services;
- providing a forum for families to come together with each other and the professionals working on their behalf – to have an active and productive dialogue in the interests of improving the quality of services;
- enabling children and young people to have a voice through advocacy, through membership of the SEND Implementation Board, through video diaries and mystery shopping;
- enabling parents and families to use alternative services to communicate with the City of London Corporation or their CCG through KIDS Mediation Service.

Families

Families of children and young people with SEND tell us they are generally very satisfied with the services they receive. Most of those we've spoken to tell us they have everything they need and some say that they haven't had to think about what they needed, it was just all arranged for them, with agencies working well together. However, a small number of families say that they have found it difficult to know what else is available (other than the services that they are offered). Others commented that they wanted their child to be able to participate more in social activities and that the City play facilities are not all accessible.

Children and young people

Across the partnership, we meet with our children and young people regularly. We understand their views about their own needs and the way they are met. But so far our conversations with children, young people and their families have been focused on those children who have had a statutory Plan. We know much less about the views of those children and young people who have additional needs but who do not meet the thresholds to have a Statutory Plan.

During 2016/17, we want an active dialogue to build with these young people. Engagement through video booths (similar to those used in the popular TV show *The X Factor*) which will be located at four City schools in September starts off this programme. Young people with SEND will be asked questions about their priorities, their views about services they already receive and those that they would like to have when using the video booth.

Children and young people will be central to strategic planning, prioritising through advising each working group of the SEND Implementation Board, and the Board itself. Mystery shopping of City of London services, facilities and

opportunities, which has begun already, will become a key element of the way we quality assure our work. Advocacy services will be offered to all children and young people with SEND as a matter of course.

Local Offer

The City of London Corporation has a published comprehensive 'Local Offer' which comprises all the services, facilities and opportunities available to children and young people with SEND and their families. We want the next development of the Local Offer to be an offer shaped by our children and their families, in which their voice is loud and strong. Work during 2016/17 will see a complete overhaul of the SEND Local Offer web pages as a consequence.

Critical Behaviour 2 - Working in seamless partnership

Our children with EHC Plans and their families tell us that on a personal level they do not experience any gaps or barriers between services provided by different agencies. On a practical level, City children and families do receive the full complement of the services they require and express a high level of satisfaction with them.

One of the challenges the City faces is that its families receive services from the City of London for early years, education and children's social care but health services come from either Tower Hamlets CCG or City and Hackney CCG. This means our shared strategies need to align with two CCGs and in both, the City has far fewer children than the other authority with which it shares services.

Going forward, the City and its CCG partners will work on new strategies together from the outset and devise strategies and services that are targeted specifically for City children and their needs.

Health Service information will play a more prominent role on the City's Local Offer web pages as well as signposting assistance about which CCG to contact.

The SEND Implementation Board is designed to be jointly owned with partners and in particular the CCGs and this strategy is a joint strategy, owned by all.

Critical Behaviour 3 – Principle C – Governance

The small number of children with SEND in the City of London means that the teams of professionals who support them and their families know them very well indeed and some have worked with them for much of their lives. The partnerships between multi-agency professionals are also very close and positive. Good governance is always very important but where relationships are close it can be easy to make assumptions and lose the detachment and rigor that might otherwise be in place.

For this reason, a new SEND Programme Board has been formed. Chaired by the Assistant Director of People, its members are all the key individuals responsible for delivering the SEND Action Plan as well as parents and young people themselves.

The progress of all children and young people with SEND is reported to the Children's Executive Board which meets on a quarterly cycle. As we learn more about the children receiving SEN Support in City Schools, their data will be included in this reporting.

There are forums which meet regularly where children and young people are the main focus of discussion.

Targeted Education Resources Panel (TERP)

This is a panel of multi-agency professionals who consider cases for allocating financial and other resources to support individual children and young people. This panel considers requests for assessment for an Education Health and Care plan. All applications for places at an independent special school are also discussed here as well as applications for short breaks or requests for additional specialist educational support. Not all requests made to the panel are for resources for children with SEND but most are.

The Panel is chaired by the Service Manager Education and Early Years. The Panel makes recommendations to a Resourcing Board chaired by the Assistant Director People from the Department of Community and Children's Services and is attended by the Lead Member for Community and Children's Services periodically.

Transitions Forum

This Forum looks closely at the transition of vulnerable children to adulthood. On a case-by-case basis, the Forum discusses the needs of those young people becoming young adults and evaluates their need to continue to receive services in adulthood. At the heart of this assessment are the wishes of the young person themselves. The Forum is chaired by the Service Manager for Education and Early Years.

Work with children and young people with SEND is also reported on regularly

at the Early Help Sub Group of the CHSB, the City and Hackney Children's Programme Board (CCG) and the Mental Health Programme Board (CCG) and the Health and Wellbeing Board.

Appendix B



City of London SEND Programme Board - Terms of Reference

Purpose / role of the group

This Board is responsible for strategic oversight of the SEND strategy, Self Evaluation and Implementation Plan. This responsibility includes:

- Delivery of the SEND Strategy 2016-20 through the SEND Self Evaluation and SEND Implementation Plan
- Agreeing work-plans and monitoring the progress of each of the 9 work streams that contribute to the City of London's work on SEND
- Leading the culture change that underpins SEND reforms, including increasing the resonance of the voice of young people and co-production with families in line with their priorities.
- Sharing Good practice

Core Membership

Chair: Chris Pelham, Assistant Director, People	City of London
Theresa Shortland, Service Manager, Education and Early Years	City of London
Rachel Green, Service Manager Children's Social Care	City of London
(TBC) , Service Manager, Adult Social Care	City of London
Sarah Darcy – Children's Programme Board Manager,	City and Hackney CCG
Rahina Miah – Head of Integrated Commissioning,	Tower Hamlets CCG
Elizabeth Begley, School Nursing Rep	Homerton
Monica Patel, Commissioning Manager	City of London
Sharon Cushnie, SEND Project Manager	City of London
Esther Olawander, FYI Manager	City of London
Juliet Curtin	City Gateway
Alex Allen, Assistant Head at SJC	City of London
Amy Montgomery, SENCO	Charterhouse Square School
Mary Rose Clackson, SENCO	Barbican Playgroup
Parent Rep x2	City of London

Invited Members

The Board will invite key individuals or groups who have specialist responsibility, knowledge or skills. The invitation will be extended in relation to specific issues that impact upon the delivery of the SEND Strategy and Implementation Plan.

Accountability

The Board is responsible/accountable for championing the needs of children and young people with SEND through the delivery of Special Educational Needs Strategy 2016-20 including actions under 6 main SEND work streams.

Working methods / ways of working

Meetings

The Board will meet on a 6 week cycle for 1.5 hours. Meetings arrangements and clerking will be provided by DCCS at the City of London.

Each Meeting will discuss the 6 SEND Implementation work streams and matters of other strategic importance including, for example

- changes to national policy and legislation,
- co-production of joint policy and strategy,
- key consultations
- serious case reviews
- Emerging intelligence, research

Sharing of Data

This Board has a multi-disciplinary membership as well as parents and children/young people. Information shared across the membership is treated in confidence and members subscribe to confidentiality upon acceptance of their membership. No child level data will be shared that can be used to identify individual children, young people or families and no case discussions will be held.

Review of ToR

The Terms of Reference will be reviewed annually.

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Committee	Dated:
Community and Children's Services Committee	10/2017
Subject: Sir John Cass's Foundation Primary School – Proposed expansion update	Public
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report author: Theresa Shortland, Head of Service – Education & Early Years	

Summary

This report is to inform Members of the progress on the proposal to expand Sir John Cass's Foundation Primary School to a two-form entry (2FE) school and to update on the 2017/18 admissions.

A risk was identified in 2013 of the City of London not being able to fulfil its statutory duty to ensure sufficient primary school places for City residents. This prompted work to be undertaken to assess the projected needs for school places in the City of London. Despite some early indications that there was an increase in need for places, this has not materialised. The position is that all children resident in the City of London have secured school places this year and in recent years, albeit not all in the school of their first choice.

Ongoing discussions between the governing body of the school, the Sir John Cass's Foundation and the City of London via a series of tripartite meetings continued to pursue possible options for expansion. Having identified that there wasn't a need for further school places, a review of the financial viability of the school as a 1FE concluded that this was not a risk at this time. At the tripartite meeting on 12 June 2017, given the Foundation had not been convinced of the need to expand the school, and the governing body no longer wishing to consider expansion at this time, it was decided not to pursue this further.

Recommendation

Members are asked to:

- Note the report.

Main Report

1. Sir John Cass Expansion Update

1.1 The proposal to expand Sir John Cass's Foundation Primary School to a two-form entry (2FE) was initially proposed at the full governing body meeting of the school on 27 March 2013. Further work was undertaken with regard to the sufficiency of school places in the City of London. The school governing body consequently agreed to introduce a bulge reception class in September 2016.

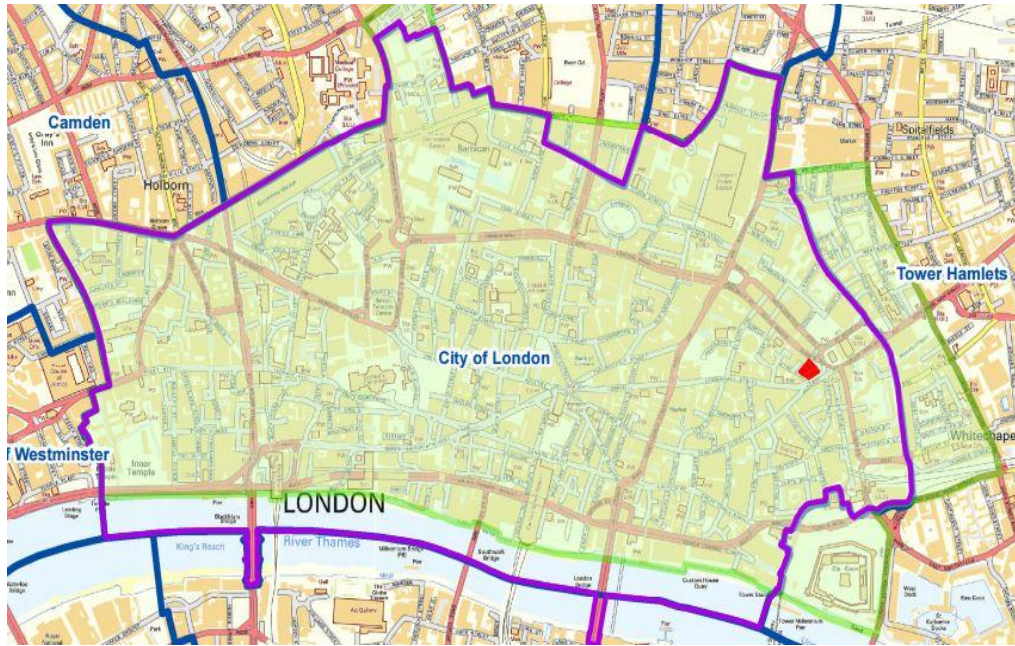
1.2 The Community and Children's Services Committee last received an update on this in a report on 11 December 2015, where it was informed that the Sir John Cass's Foundation had resolved not to give its consent to grant a licence to build, thereby preventing the proposed expansion.

1.3 On-going discussions between the governing body of the school, the Sir John Cass's Foundation and the City of London via a series of tripartite meetings continued to pursue a possible option for expansion. Having identified that there wasn't a need for further school places, a review of the financial viability of the school as a 1FE concluded that this was not a risk at this time. At the tripartite meeting on 12 June 2017, it was decided not to pursue this further.

1.4 At this time, a risk was then identified of the City of London not being able to fulfil the statutory duty to ensure sufficient primary school places for City residents. This has not happened and subsequently all children resident in the City of London have secured school places, albeit not all in the school of their first choice.

2. Pupil Place Planning 2016/17 – Update

2.1 Sir John Cass's Foundation Primary School year on year attracts a high number of first-preference applications for places that exceed the 30 places available at the school. The school's priority catchment area is identified in the map below; it is worth noting that this area extends into the London Borough of Tower Hamlets.



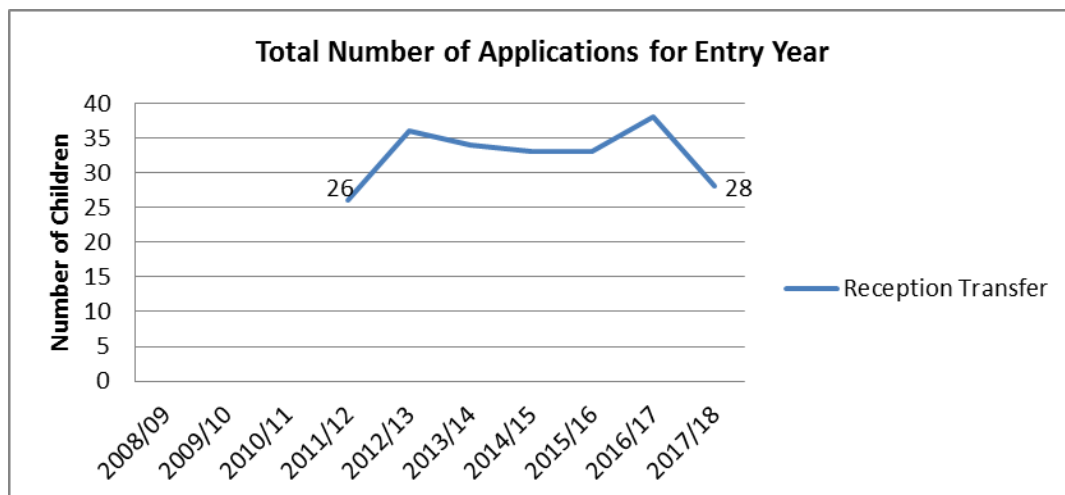
Sir John Cass's Foundation Primary School priority catchment area

2.2 The 2016/17 entry year saw an increase in the number of City of London resident pupils applying for a place at the school and an increase in the success of their applications. This was due to the introduction of the bulge reception class for this entry year.

2.3 Overall, applications for the 2017/18 entry year to Sir John Cass have fallen. Out of the 10 first-preference applications made by local families, six City of London families received an offer of a place, a decrease on previous years.

3. Primary Admissions

3.1 The graph below shows the total number of City of London applications made by City of London families over the past six years for all primary reception school places.



Applications for school places 2011/12 to 2017/18

3.2 In 2017/18, 28 children made applications for primary admission. The City of London Primary Academy Islington (COLPAI) was not part of the Pan London Co-ordinated Admissions System as it is a new academy school. This meant that families applied to the school directly and the figures were not included in the City of London's overall preference allocation percentage.

Offer day primary preference allocation breakdown			
School	Number of Children	Borough	Preference Numbers
City of London Academy Islington Primary	8	Islington	First = 8
English Martyrs Roman Catholic Primary School	2	Tower Hamlets	First = 2
Hugh Myddelton Primary School	1	Islington	First = 1
Prior Weston Primary School and Children's Centre	6	Islington	First = 5, Second = 1
Sir John Cass Foundation Primary School	6	City of London	First = 6
St Clement Danes CoE Primary School	3	Westminster	First = 1, Second = 1, Fourth = 1
St George the Martyr Church of England Primary Sch	1	Camden	First = 1
St Paul's Whitechapel Church of England Primary Sc	1	Tower Hamlets	Second = 1
The New North Academy	1	City of London	Third = 1
St Peter and St Paul RC Primary School	1	Islington	First = 1

For this report, we have made the assumption that all families who received an offer at COLPAI would have put the academy as their first preference.

Post offer day preference allocation breakdown			
School	Number of Children	Borough	Preference Numbers
Canon Barnet Primary School	1	Tower Hamlets	Third = 1
City of London Academy Islington Primary	7	Islington	First = 7
English Martyrs Roman Catholic Primary School	2	Tower Hamlets	First = 2
Hugh Myddelton Primary School	1	Islington	First = 1
Prior Weston Primary School and Children's Centre	6	Islington	First = 5, Second = 1
Sir John Cass Foundation Primary School	6	City of London	First = 6
St Clement Danes CoE Primary School	2	Westminster	Second = 1, Fourth = 1
St George the Martyr Church of England Primary Sch	1	Camden	First = 1
St Paul's Whitechapel Church of England Primary Sc	1	Tower Hamlets	Second = 1
St Peter and St Paul RC Primary School	1	Islington	First = 1
Not accepting		One family is moving out, the second has opted for an independent school.	
Fraudenant application	1	Parent lived in Islington at the time of application	

3.3 Following the offer date of primary admissions, it is apparent that if the City of London Academy was part of the Pan London Co-ordinated Admissions System, the number of first preferences allocated would be 83%. Only six of the 10 City of London resident children were allocated a place at Sir John Cass's Foundation Primary School. In total, six resident children were allocated a school place at Prior Weston Primary school in the neighbouring borough of Islington. The rest were allocated places at seven other neighbouring borough schools.

4. Secondary Admissions

4.1 In 2017/18, 17 children have made secondary applications. In total, six have Central Foundation Boys School as their first choice and the other applications are to City of London Academies and faith schools in neighbouring boroughs. The secondary offer date was 1 March 2017.

Offer day secondary preference allocation breakdown			
School	Number of Children	Borough	Preference Numbers
Ark Globe Academy	1	Southwark	Fourth = 1
Bishop Challoner Catholic Collegiate Girls School	1	Tower Hamlets	First = 1
Central Foundation Boys' School	6	Islington	First = 6
City of London Academy - Islington	1	Islington	First = 1
City of London Academy (Southwark)	2	Southwark	Second = 2
Elizabeth Garrett Anderson Language College	1	Islington	First = 1
Haggerston School	1	Hackney	First = 1
St Aloysius RC College	1	Islington	Fifth = 1
Wapping High School	1	Tower Hamlets	Second = 2
Holloway	2	Islington	ALLOCATED

Final secondary preference allocation breakdown			
School	Number of Children	Borough	Preference Numbers
Ark Globe Academy	1	Southwark	Fourth = 1
Bishop Challoner Catholic Collegiate Girls School	1	Tower Hamlets	First = 1
Central Foundation Boys' School	6	Islington	First = 6
City of London Academy - Islington	1	Islington	First = 1
City of London Academy (Southwark)	2	Southwark	Second = 2
Elizabeth Garrett Anderson Language College	1	Islington	First = 1
Haggerston School	1	Hackney	First = 1
St Aloysius RC College	1	Islington	Fifth = 1
Wapping High School	1	Tower Hamlets	Second = 2
2 families who were allocated places have offers at Francis Holland and City of London School for Girls			

4.2 For secondary allocations, six were at Central Foundation Boys' School. In total, 10 received their first choice. In addition, two were allocated places at City of London Academy (Southwark) and Wapping High School. There was one fourth and one fifth choice to Catholic schools in neighbouring boroughs.

5. School Capacity Survey 2017

5.1 The City of London has to provide an annual School Capacity survey to the Department for Education every year. This presents an analysis of current and projected pupil place pressures and available capacity. As part of this commentary, we have to explain any school capacity issues, notably where schools/planning areas have, or are projected to have, a shortfall of places, and the steps being taken to address them.

5.2 The City of London has one maintained school, Sir John Cass's Foundation Primary School; a voluntary aided Church of England primary school in the heart of the City of London. The school is rated Outstanding by Ofsted and is situated on our eastern boundary with the London Borough of Tower Hamlets.

5.3 Tower Hamlets residents from the area to the east of Aldgate and Tower Hill fall within the preferred catchment area; therefore, an increase in that borough's population has an impact on demand for places at the one school in the City of London.

6. Sir John Cass Foundation Primary School Expansion Proposals

6.1 The School Capacity survey for 2017 confirmed the decision that Sir John Cass's Foundation Primary School will not go ahead with the proposal for expansion to a 2FE school and will remain a 1FE school for the foreseeable future.

6.2 The increase in demand for school places is having an impact on families who live locally to the school; furthermore, Tower Hamlets is predicting a shortfall of 90 places for children of reception age in 2023. The City of London will continue to monitor population trends and application rates, to determine the demand for places, which will feed into our future pupil place planning processes and reports.

7. Education Funding Agency (EFA) funding

7.1 As the proposed expansion did not proceed, we have proposed to return the funding to the EFA. The City of London is in dialogue with the EFA to determine the level of funding being returned.

8. Proposals

8.1 To continue to monitor the impact of the bulge class and the admissions criteria at Sir John Cass Primary School and to ensure that the City of London discharges its statutory duty to provide school places for residents of the City of London.

9. Conclusion

9.1 The City of London is able to meet the statutory requirement to provide sufficient school places for resident children. School place planning should enable the City of London Education Services to meet the statutory duty to provide sufficient school places. In this context, it may be essential to revisit the expansion of the school in future years if demand for places increases. For the City of London to ensure it meets these requirements, the annual school planning exercise is essential. The School Capacity 2017 indicates that new schools in neighbouring boroughs are likely to have an impact on the demand and supply requirements in future years.

Appendices

None

Background Papers

The Community and Children's Services Committee last received an update on this in a report on 11 October 2015.

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Committee(s)	Dated:
Community and Children's Services – For DLT – For recommendation	12/09/2017
Subject: Supporting Adult Carers	Public
Report of: Director of Community and Children's Services	For Decision
Report author: Anna Grainger, Department of Community and Children's Services	

Summary

It is proposed that the current Carer grant payments are amended as a recent audit determined they could be improved in line with the requirements of the Care Act. The payments are also inconsistent with many other Local Authority payment amounts. The suggested solution is to amend the system from the current “grant” allocations of £150, £700 and £3,000. Carers will be offered both universal and targeted support by way of information and advice as well as services such as carer groups. Carer assessments will be conducted with a view to allocating a personal budget where a carer has eligible needs. This is likely to mean that some carers may see their historic allocation reduce whilst others at the lower end of the previous grant scale are likely to see an increase. The money is determined via a carer assessment and (where eligible) a Resource Allocation System (RAS). This is calculated via the assessment through the “FACE tool”. This will be incorporated into the new Mosaic case management system. It will calculate entitlement via a formula but will have a maximum payment amount of £1,560. However this can be overridden where there is a clear need. Essentially this is a move to more personalised support. Carers grants are not means tested. The previous carer grants included money for respite for the cared - which was not previously means tested. The new approach will see the cared for person charged for respite where they are able to afford this. This is a statutory requirement of the Care Act. This is not applicable to paid carers, such as home carers.

Recommendation

Members are asked to recognise the important role that carers play in supporting friends and family members within the City of London.

Members are asked to approve:

1. The new system of payments for carers
2. That respite care is now subject to means testing of the “cared for” person which is likely to bring in some income and is in line with the Care Act.
3. That the new system will commence with the start of the new IT system, Mosaic during November 2017.
4. That carers who received grants in 2017/18 are offered a re-assessment of needs if they have received the lower amounts previously.

Main Report

Background

- 1.1 Nationally and locally, carers provide vital support to the people they support. A City of London carer strategy and action plan for adult carers is in place. The carer strategy focuses on 6 key areas: early identification, personalised support, involvement, improving health and wellbeing, improving economic and social wellbeing and a life after caring. It was based on a piece of research conducted within the City by Carers UK in 2015. In addition support for carers is a thread running through all strategies within SEND, for young carers and across social care. However the payments in question relate to people over 18.
- 1.2 The Care Act demands that Local Authorities are mindful of the need to “Prevent, Reduce and Delay” the need for funded support whilst also supporting carers to access assessment and support when eligible.
- 1.3 The Carer strategy addresses wider support for carers, such as respite, which will still be available. Other means of support are being explored in the City and across London for carers, such as discounts at London shops and businesses. In addition, support will still be available as part of the Reach Out Network carer groups.

Current Position

- 2.1 City of London adult social care carries out an assessment of adult carer needs based on eligibility criteria. Where appropriate a carer’s payment has been available historically, providing £150, £750 or £3,000 annually per carer as a grant to the person. This approach has started from an assumption that carers are entitled in the main to fixed amounts. In 2016/17 42 carers received such a payment.
- 2.2 The Care Act emphasises the need to focus on strengths (what people CAN do) and to develop more accessible universal offers to people generally – e.g. websites to give information and advice. The carer assessment focuses on this.
- 2.3 There is no national fixed rate that Authorities must give, but it is a statutory requirement to offer an assessment and meet eligible need. The assessment considers if a need is already met – e.g. money or support to reduce social isolation is not provided if the person has a large network of friends. Some Local Authorities in London do not give any fixed amounts of funding. Benchmarking figures are available at Appendix One. In total last year the benchmarking shows that low numbers have been allocated the £3,000 top amount previously, but that these carers may receive less under the new system. If this is found to be the case, following the new needs assessment, the funding level will be incrementally reduced to support the transition to the new rate– conversely those at the lower end are likely to receive more.

- 2.4 Benchmarking was carried out by FACE on carer payments across London and the projected impact on current carers in the City. The maximum amount in the proposed calculated system will be £1,560 which is in line with benchmarked authorities. However consideration will be given to those whose caring role would break down without more support or more money than this top amount.
- 2.5 An Equality Impact test of relevance has been carried out which concluded that a full Equalities assessment was not needed as the proposal is in line with statutory duties. The new system allows the indicative amount to be overridden if this will help a carer maintain their caring role – i.e. if someone needs more they can have this.

Implications

- 3.1 The current system is inequitable with other benchmarked authorities and could be open to challenge. It does not appropriately meet personalised need.
- 3.2 The Comptroller and City Solicitor have been consulted and have no additional comment on the contents of this report.
- 3.3 There are no financial implications – the costs of meeting these requirements will be met by the Departmental Local Risk budget.

Options

- 4.1 Do nothing. If this option is chosen it is likely that the Authority could be open to legal challenge because the way to calculate resources available to carers would not be transparent nor potentially Care Act compliant. The current grant system is not based on need versus actual spend so may not be best value for money. With increasing numbers of elderly people predicted the Council needs to ensure best use of decreasing resources so it can support people into the future.

Approve the following:

1. The new system of payments for carers
2. That respite care is now subject to means testing of the “cared for” person which is likely to bring in some small income and is in line with the Care Act.
3. That the new system will commence with the start of the new IT system, Mosaic during November 2017.
4. That carers who received grants in 2017/18 are offered a re-assessment of needs if they have received the two lower amounts previously.

Conclusion

- 5.1 Members are asked to approve the options 1-4 in section 4 above.

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Appendix One: Carers Payments Impact Summary

The FACE organisation provided benchmarking data from 6 London LAs and a further 6 regional LAs used to formulate the Mosaic City RAS calculation as follows:

- No change to those reporting no significant impact on their wellbeing - supported by information and advice, local offer including Carers Support Group, along with universal services including health where appropriate.
- The maximum payment available will be reduced to 1560 - in line with the highest level currently allocated across all those benchmarked.
- The lowest level payment will be increased to 200 - in line the highest level currently allocated across all those benchmarked
- All other payment values based on the average payment made by the 6 London LA's or the average payment made by all 12 nationally benchmarked LA's whichever is the highest.

Projected Impact based upon 2016/17 payments (note difficulty in estimates due to different assessment model)

8 carers received maximum payment of 3K

26 carers received £750 - the amount could go up or down but would depend on individual needs.

8 carers received £150 - all 8 likely to have at least another £50 per year

Committee(s)	Dated:
Department of Community and Children's Services	13/10/2017
Subject: City of London Corporation's Academies Development Programme	Public
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report Author: Gerald Mehrtens, Director of Academy Development, Department of Community and Children's Services	

Summary

This Committee is responsible for the exercise of the City of London Corporation's education functions in its local authority capacity. This report is to inform Members of the progress being made by the City of London Corporation (City Corporation) in its general corporate capacity in the London Boroughs of Southwark, Islington, Hackney and Newham through the City of London Academies Development Programme which is led by the Education Board.

The City Corporation is a long-standing supporter of education and in January 2016 the Court of Common Council agreed the City of London Academies Trust (CoLAT) should become the legal vehicle for all the City Corporation's existing and future sole-sponsored academies, consistent with the City Corporation's Education Strategy to provide access to 'world class' education and learning opportunities and that "City schools" will provide outstanding education that enriches and inspires students.

In addition to the pre-existing sole-sponsored City academies, the City of London Academy (Southwark) and Redriff Primary – City of London Academy, the City Corporation, as an academy sponsor, has since made six successful applications under the Free Schools application process to open new academies, and has also agreed to be the sponsor for a seventh academy, following the Academisation Order made in respect of an existing maintained school after an inadequate Ofsted inspection.

Good progress has been made to open all of these academies in the 2016/17 and 2017/19 academic years and therefore to expand world class primary and secondary education provision in neighbouring boroughs.

However, academies in general will continue to face challenges, such as securing pupils, financial stability, academic excellence and capital programmes. To this end, the inclusion of potential risks has been added to the Department of Community and Children's Services (DCCS) Risk Register. This will identify potential challenges at the earliest stages and resolve them to ensure these academies are ready to open and deliver 'world-class' education

and learning opportunities.

The academies development programme is an ambitious expansion of the City's support for education, consistent with the City's commitment in its Education Strategy, to provide access to 'world-class' education and learning opportunities and ensure that 'City schools' will provide outstanding education that enriches and inspires students.

Recommendation(s)

Members are asked to:

- Note the progress made by the City Corporation as sponsor in its academies development programme, and that this adds to the opportunities for City children to attend a range of establishments offering high standards of education.

Main Report

Background

1. The City of London Corporation (the City) is a long-standing supporter of education both in its general corporate capacity and more recently as local authority for the City of London. This Committee is responsible for the exercise of the City of London Corporation's education functions in its local authority capacity. The Education Board has responsibility *inter alia* for leading on the development and implementation of the City Corporation's Education Strategy (support for education being one of our corporate aims), and for the City Corporation's sponsorship of academies acting in the City Corporation's general corporate capacity.
2. In January 2016 the Court of Common Council agreed that the City of London Academies Trust (04504128) (CoLAT), previously "The City of London Academies (Southwark)", should become the legal vehicle for all the City Corporation's existing and future sole sponsored academies. The City Corporation is also a co-sponsor of two other secondary academy schools run by The City Academy, Hackney (06382192) and the City of London Academy Islington Limited (06426966) which are co-sponsored by KPMG and the City University, respectively. Academy trust companies are private companies limited by guarantee and exempt charities.
3. The City Corporation (through the Education Board and Policy and Resources Committee) has agreed to expand the number of academies for which it is sole sponsor through CoLAT (to a maximum of 12 schools consistent with Government policy and that multi-academy trust companies should seek to achieve economies of scale).
4. In October 2014, the City Corporation, as an academy sponsor, submitted applications to the Department for Education (DfE) to open two primary Free Schools, one in Southwark in September 2016, and one in Islington in September 2017, as part of Wave 8 of the Free School application process. Following interviews held at the DfE on 5 February 2015, both applications were successful.

5. In March 2016, the City Corporation submitted four further applications to the DfE to open Free Schools as part of Wave 11 of the Free School application process. Following interviews held at the DfE on 13 May 2016, confirmation was received on 7 July 2016 that three applications had been successful, and on 9 December 2016 that the fourth application had also been successful.
6. In addition to the successful applications to open academies, the City Corporation was approached to convert an existing maintained secondary school in Islington into a City of London Academy following an inadequate Ofsted inspection. This placed the school in special measures, and therefore subject to an Academisation Order. On 16th March 2017, following approval of the proposal by, the Education Board, Policy and Resources Committee, and the CoLAT Board of Directors, the City Corporation was named as the sponsor by the Regional Schools Commissioner on 20th March 2017.
7. The details of these academies and when they are due to open are in the City of London 'Family of Schools' table in Appendix 1.
8. While the proposed academies are in the Pre-opening Development Grant (PDG) stage with the DfE, the programme management falls under the remit of Director of Academy Development for the City as sponsor (working with CoLAT). This arrangement continues until these schools progress to a Readiness for Opening Meeting (ROM), a Pre-OFSTED inspection visit is undertaken, a funding agreement is entered into by CoLAT, and the Secretary of State for Education agrees to open the school. At this point full management of the school becomes the responsibility of the CoLAT Board and operates under CoLAT's approved local governing body arrangements. The capital programmes for these academies also falls under the remit of the Director of Academy Development, either with the City as responsible for the capital build, or monitoring of capital programmes delivered by the local authority in which they are being built. An overview of the academy capital programmes which shows where the responsibilities lie in terms of delivery, and key dates is attached as Appendix 2.
9. While in the PDG stage, monthly project board meetings, chaired by the Director of Academy Development, manage these projects by putting in place the necessary infrastructure to open a school, effectively a multi-million-pound business. The progress reported at the project boards is monitored by a quarterly programme board, chaired by the Director of Community and Children's Services, with representation from the local authority in which the new academy will be located, and from the CoLAT Board. Updates are also reported to the CoLAT Board and the City's Education Board meetings.

Current Position

10. The academies expansion programme has made considerable progress in increasing the number of academies sponsored solely by the City of London, with a successful opening of a primary academy in Southwark in September 2016, a further five academies to open in this academic year across Islington, Hackney and Newham, and a further academy scheduled to open in Hackney in September 2019. Although these academies' admissions policies do not set aside places for City residents – as was the case with the original three secondary City sponsored academies which were established under the old

academies programme and permitted that type of provision, – the academies do increase the options available for City residents applying for places. This is particularly important in the case of the City of London Primary Academy Islington, since again this year no City child was able to secure a place at Sir John Cass's Foundation Primary School under the distance criterion. Details of each of these new City academies are listed below.

11. **Galleywall Primary, City of London Academy** is a two-form entry (FE) primary school which opened in September 2016 with the full number of 60 reception pupils taking up places, and a further 58 pupils in this academic year. The academy is based in an existing Victorian Board School in Southwark which is undergoing extensive refurbishment, delivered by the City. The Headteacher of Redriff Primary is also Executive Head for Galleywall, supporting the newly appointed Head in her first headship.
12. **City of London Primary Academy Islington** is a 2FE primary school which opened in September 2017. Despite the high number of applications received, 41 pupils have started at the school for the 60 places available, with eight of these places offered to City residents. The school will be based on a temporary site at Moreland Primary School in Islington for two years while the permanent site is being built. The temporary site seen as the main reason why all the applications did not result in pupils starting at the school. The permanent site is presently going through the planning application process and is being delivered by the City. The Headmistress of the City of London School for Girls is also Executive Head for this academy, supporting the newly appointed Head in her first headship.
13. **City of London Academy, Shoreditch Park** is a 6FE secondary school plus sixth form which opened in September 2017, with the full complement of 180 pupils. The academy will be in temporary modular accommodation for the first three years before moving to its permanent site in Hackney. The permanent site is being delivered by Hackney Council. The Principal appointed was previously the Vice Principal at The City Academy, Hackney.
14. **City of London Academy, Highgate Hill** is the conversion of the existing Mount Carmel Roman Catholic Technology College for Girls, to a 5FE City of London Academy, which opened in September 2017 in Islington, with 92 pupils in Year 7, for the 140 places available. Despite this previously being a successful school, numbers at the school had been declining due to a lack of demand for a single-sex Catholic school in the area, whereas there is a demand for a co-education, non-denomination school.
15. **City of London Academy, Downs Park** is a 6FE secondary school plus sixth form which is due to open in September 2019 in Hackney. The capital programme will be delivered by Hackney Council.
16. **Newham Collegiate Sixth Form Centre (NCS), City of London Academy** is the conversion of a successful 600-pupil sixth form school into a City of London Academy. It was due to convert from September 2017 but will now do so before the end of this academic term. NCS is a high-performing school with results in the top 1% of schools in the country. The delay in confirmation from the DfE that the City Corporation was successful in becoming the sponsor for this academy is partly why a funding agreement is not yet in place, along with negotiations not being completed with Newham Council on the lease arrangements for the site.

17. **City of London Academy, Highbury Grove** is a 7FE school in Islington. The City agreed to become its sponsor following an inadequate Ofsted inspection in December 2016, leading to an Academisation Order being issued by the Regional Schools Commissioner. Colleagues across the CoLAT, the City and Islington Council have been working very closely over the past few months on the transition of this maintained school to a City Academy. The Principal of City of London Academy, Islington has taken on the role of Executive Head across the two schools. CoLAT's input over the previous summer term has already demonstrated an impact, as shown by the recent academic results and successful Ofsted inspection in September 2017.

Implications

18. The key challenges in opening academies is ensuring that the necessary infrastructure and funding arrangements are in place for the running of a school and that there is an outstanding physical learning environment. Good progress is being made in these areas for the academies in this report. Any delays caused by not securing the necessary infrastructure, financial stability and/or premises will have detrimental effect on the reputation of the CoLAT and the City Corporation, as well as on the delivery of world-class education to pupils at the academies. With this in mind, potential risks have been added to the Department of Community and Children's Services (DCCS) Risk Register, which will escalate to the Corporate Risk Register and the Chief Officers Risk Management Group, should the need demand. Officers will keep matters under regular review and report to the Education Board consistent with that Committee's responsibilities for the oversight and monitoring of the City Corporation's sponsorship of its academies.

19. All free schools are funded directly by the Education Skills and Funding Agency. There is no direct financial liability to the City Corporation as each Board of Directors/Trustees has ultimate responsibility for the success of that academy trust company and its schools. The City Corporation has rights of appointment to the company membership and Board of Directors/Trustees of each academy trust company, and the City Corporation can choose to provide financial or other support to its sponsored academies to help achieve successful outcomes. Strong project management and governance arrangements are in place to support the successful opening of the new academies.

20. The second objective of the City Corporation's Education Strategy 2016–2019 states any new academy is expected to be outstanding within three years and that schools will have cluster arrangements by geographical location.

Conclusion

21. The Academy Development Programme is an ambitious expansion of the City's education portfolio to support the aims of the Education Strategy to provide access to 'world class' education and learning opportunities and that City schools will provide outstanding education that enriches and inspires students. The academies expansion programme is making good progress and adds to the opportunities for City children to attend a range of establishments offering high standards of education.

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Appendices

- Appendix 1 – City of London ‘Family of Schools’ table
- Appendix 2 – City of London Academies Capital Programme

City of London Family of Schools

City of London 'Family' of Schools (CoLAT Up to 12 schools)	Leadership	Ex Pr		Ex Pr	HT	HT	Pr	Ex Pr		Ex Pr		HT	Pr	Pr	Pr	Pr			
		MKE - SCO		RBA	RMA	SFL	NHA	CVE		EHA - KCL		TWI	MIS	HAR	NA	MMA			
	Governance	LGB	LGB	LGB	LGB	LGB	IGB	LGB	LGB	LGB	IGB	LGB	LGB	IGB	NA	LGB			
	Name of Academy	Redriff Primary, City of London Academy		Galleywall Primary, City of London Academy	City Of London Academy (Southwark)		City of London Freemen's School	City of London School		City of London Academy, Highgate Hill	City fo London Academy, Islington	City fo London Academy, Highbury Grove	City of London School for Girls	City of London Primary Academy, Islington	Sir John Cass Primary School	Newham Collegiate Sixth Form	City of London Academy, Shorditch Park	City of London Academy, Downs Park	The City Academy, Hackney
	Most recent inspection grade	Outstanding 2011	Not yet inspected	Good 2016	Outstanding 2015	Outstanding 2011	Good 2014 (Mount Carmel)	Good 2014	Inadequate 2017	Outstanding 2015	Not yet Inspected	Outstanding 2013	Not yet inspected	Not yet inspected	Not yet inspected	Not yet inspected	Outstanding 2012		
		Primary		Secondary		Secondary		Prim		Secondary		East							
		South		North		East													
	Key	 CoLAT Academy	 Co-Sponsored academy	 Independent School	 Mainatined School														

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City of London Academies - Capital Projects Overview

Academy	Galleywall	CoLPAI	CoLAPAI	CoLA HH	CoLASP	CoLASP	CoLAS/Verney Rd	Redriff CoLA
Project	Refurbishment	Temporary Site	Main Build	Alterations	Temporary Site	Main Build	Sixth Form	Expansion
Ownership and Management								
Project Owner	CoL	CoL	CoL	CoL	Hackney	Hackney	CoLAS LGB	Redriff LGB
Project Management	CoL Surv	CoL Surv	CoL Surv	CoL Surv	LBH Surv	LBH Surv	Fulkers	LGB Des+Build
Funding and Budget Control								
Funding source	EFA	EFA	EFA	EFA	EFA	EFA	3m EFA .3m CoLAS	Redriff Reserves
Funding and Financial Control	EFA	EFA	EFA	EFA	EFA	EFA	LGB	LGB
Total Budget	£6 Mill	£295 K	£7 Mill*	TBC	TBC	£21 Mill	£3.3 Mill	£309 K
Projected Spend	£6 Mill	£295 K	£7 Mill*	TBC	TBC	£21 Mill	£3.3 Mill	£233 K
Contingency (EFA 5%)	£300 K	NA	£350 K	TBC	TBC	£1.05 Mill	£400K	NA
Budget Risk	M	L	M	L	M	M	L	H
Approvals and Monitoring								
Project Sub Approval required	Yes	Yes	Yes	Yes	Yes	Yes	No	No
Education Board monitoring	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
CoLAT approval required	No	No	No	No	No	No	Jul-16	Apr-16
CoLAT monitoring	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Planning application date	N/A	N/A	Sep-17	N/A	Nov-16			
Proposed Completion Date	Sep-18	Sep-17	Sep-19	Sep-17	Sep-17	Sep-19	Aug-18	Sep-16
Completion Risk	L	L	H	M	L	H	L	H

* Final budget for COLPAI still to be agreed with the ESFA

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