



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

Date: THURSDAY, 20 SEPTEMBER 2012
Time: 1.45pm
Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

Members: Deputy Billy Dove (Chairman)
Virginia Rounding (Deputy Chairman)
Revd Dr Martin Dudley
Alderman David Graves
Deputy Revd Stephen Haines
Deputy Henry Jones
Peter Leck
Anthony Llewelyn-Davies
Gareth Moore
Angela Starling

Enquiries: Caroline Webb
tel. no.: 020 7332 1416
caroline.webb@cityoflondon.gov.uk

Lunch will be served in the Guildhall Club at 1.00pm

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Reports

1. **APOLOGIES**
2. **DECLARATIONS BY MEMBERS OF PERSONAL AND PREJUDICIAL INTERESTS IN RESPECT OF ITEMS ON THIS AGENDA**
3. **MINUTES**
To agree the public minutes of the meeting held on 2 July 2012 (copy attached).

For Decision
(Pages 1 - 4)
4. **DRAFT REVISED ALLOCATIONS POLICY**
A report of the Director of Community and Children's Services (copy attached).

For Decision
(Pages 5 - 38)
5. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
6. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
7. **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 as follows:-

Part 2 - Non-Public Reports

8. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held on 2 July 2012 (copy attached).

For Decision
(Pages 39 - 40)
9. **AFFORDABLE HOUSING PROVISION**
A report of the Director of Community and Children's Services (copy attached).

For Information
(Pages 41 - 84)
10. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

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

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Agenda Item 3

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

Monday, 2 July 2012

Minutes of the meeting of the Housing Management Sub (Community and Children's Services) Committee held at Guildhall, EC2 on Monday, 2 July 2012 at 1.45 pm

Present

Members:

Deputy Billy Dove (Chairman)
Virginia Rounding (Deputy Chairman)
Revd Dr Martin Dudley
Alderman David Graves
Deputy Revd Stephen Haines
Deputy Henry Jones
Peter Leck
Gareth Moore
Angela Starling

Officers:

Caroline Webb	- Town Clerk's Department
Joy Hollister	- Director of Community & Children's Services
Eddie Stevens	- Community & Children's Services
Carla Keegans	- Community & Children's Services
Mike Kettle	- Community & Children's Services
Wendy Giaccaglia	- Community & Children's Services
Mark Jarvis	- Chamberlain's Department

1. APOLOGIES

Apologies for absence were received from Anthony Llewelyn-Davies.

2. DECLARATIONS BY MEMBERS OF PERSONAL AND PREJUDICIAL INTERESTS IN RESPECT OF ITEMS ON THIS AGENDA

Deputy Henry Jones declared an interest as a leaseholder on the Middlesex Street Estate, and as a business leaseholder.

Gareth Moore declared an interest as a tenant of the Golden Lane Estate.

3. MINUTES

The public minutes of the meeting held on 23 May 2012 were approved, subject to Peter Leck to be marked as present.

4. HRA REVENUE OUTTURN 2011/12

The Sub Committee received a joint report of the Chamberlain and Director of Community and Children's Services, which compared the outturn for the

Housing Revenue Account (HRA) in 2011/12 with the final agreed budget for the year.

The Housing Service Director undertook to investigate the £16,000 overspend of the 'Tenants Grants and Compensation' budget.

Members were informed that any underspend in the HRA budget would be rolled over to the following year. A revised business plan would be submitted to the November Sub Committee meeting and would include opportunities and/or recommendations for reinvesting any surpluses/savings.

RECEIVED

5. ANNUAL REPORT FOR TENANTS AND STAR SURVEY RESULTS

The Sub Committee received a report of the Director of Community and Children's Services, which presented Members with the third Annual Report for Tenants and summarised the results of the STAR tenant satisfaction survey.

The STAR survey showed that tenant satisfaction with the overall service provided by the City of London had remained high and in the top quartile nationally. This was a great achievement given the recent front-line staffing changes and the national rent increases that followed.

The Annual Report to Tenants provides information on the STAR survey results as well as the routine performance information. The Report will be delivered to all tenants over the next few weeks.

The Housing Services Director agreed that there is on-going work to ensure satisfaction with the repairs service is treated as a priority and that we look more deeply at why some tenants do not feel that we take their views into account. Managing expectations is important as part of this work.

Members debated the possibility of officers discussing with residents the option of increasing service charges to cover the cost of offering further services, should they want them. This will be explored during the financial modelling of the HRA business plan and contained in the above mentioned report to Committee in November.

The Housing Service Director informed Members that two new members of staff with previous call centre experience had been hired to answer general enquiry calls, in a bid to improve telephone satisfaction levels. He was conscious of the rising levels of energy bills and would be investigating ways in which energy could be provided to residents in a more cost effective way.

RECEIVED

6. HOUSING ESTATES - ALLOCATED MEMBERS' REPORT

The Sub Committee received a report of the Director of Community and Children's Services which provided an update on events and activities on the City of London Corporation's 11 social housing estates.

Members were informed that the consultation on the name of the new library and community centre was currently underway to include a wide group of stakeholders. Residents on the Middlesex Street estate had already been consulted and their views would be taken in to account.

The Sub Committee agreed that the work of Harper Ozkulac, the estate officer for the Holloway Estate, should be highlighted.

RECEIVED

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

There were no questions.

**8. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT
Jubilee Celebrations**

The Sub Committee was shown a short PowerPoint presentation comprising pictures of various housing estate residents celebrating during the Jubilee weekend.

RECEIVED

Jubilee Party Funding

Deputy Henry Jones thanked the City of London Corporation and the Housing Management Sub Committee for their financial contribution towards the Jubilee parties on the housing estates.

9. EXCLUSION OF THE PUBLIC

RESOLVED - 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 as follows:-

<u>Item No.</u>	<u>Exempt Paragraph(s) in Schedule 12A</u>
10-11	3
12-13	-

**SUMMARY OF MATTERS CONSIDERED
WHILST THE PUBLIC WERE EXCLUDED**

10. MINUTES

The non-public minutes of the meeting held on 23 May 2012 were approved.

11. **MIDDLESEX STREET SUSTAINABILITY PROJECT (MSSP) PHASE III**
The Sub Committee considered a report of the Director of Community and Children's Services outlining gateway 3 of the Project Approval Procedure for the Middlesex Street Sustainability Project (MSSP) Phase 3.
12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no non-public questions.
13. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was one item of urgent business.

The meeting ended at 2.34pm

Chairman

Contact Officer: Caroline Webb
tel. no.: 020 7332 1416
caroline.webb@cityoflondon.gov.uk

Agenda Item 4

Committee(s): Housing Sub-Committee	Date(s): 20 September 2012	Item no.
Subject: Draft revised Allocations Policy	Public	
Report of: Director of Community & Children's Services	For Decision	
Ward (if appropriate):		
<u>Summary</u>		
<p>This report presents Members with a revised Allocations Policy, which is a draft. A presentation will be made at the September Housing Sub-Committee meeting to facilitate a discussion with Members on the key proposed changes, before a final draft goes out for statutory consultation. The final revised policy will be presented to this sub-committee in November for approval (dependent on no major changes coming out of the statutory consultation, in which case it would be January 2013).</p>		
<p>The Allocations Policy is a critical policy for the City of London's Housing Services as it stipulates who we will accept as tenants and what priority we will give applicants. This is currently a 'hot topic' in this time of acute social housing shortage and high levels of demand.</p>		
<p>It is a legal requirement for us to have an Allocations Policy. The Localism Act 2011 made significant changes to the way social housing can be allocated and so we committed ourselves to reviewing our existing policy in 2012. This review is to ensure we take advantage of the new freedoms now offered and also to consider any local factors we may want to include in our revised policy.</p>		
Recommendations		
Members are asked to:		
<ul style="list-style-type: none">• Discuss and agree the proposed revised draft Allocations Policy, in order that a final draft can be published for statutory consultation.		

Main Report

Background

1. The City of London Corporation is a registered provider of social housing and owns and manages 1901 properties for rent. It allocates these properties in accordance with its existing Allocations Policy (2006). Given the changes to the law (Localism Act 2011) in relation to the allocation of social housing, we are reviewing our policy in order to ensure we have a robust policy that reflects national changes and our local requirements.
2. The draft revised policy (attached as Appendix 1) is intended to provide a clear and concise guide to our approach to allocating our rented homes for anyone to read. Allocating homes is a complicated area and one open to legal challenges, therefore we have stipulated that the policy cannot cover for every eventuality.
3. The existing Allocations Policy was comprehensive but is increasingly out of date and does not include some areas which had the increasing risk of subjecting us to legal challenges. It also heavily favours existing tenants over those on the waiting list who are in greater housing need. The draft revised policy aims to rectify the problems identified and offer a more balanced policy between existing and aspiring tenants, at this time of acute housing need.
4. We are required to publish and provide a summary of the final policy to all potential applicants and anyone else on request. We are also required to provide a copy of the full policy to anyone on request, for a small fee. In the interests of transparency we intend to publish the final policy on our website.
5. As part of this policy review, there is a programme of consultation, some aspects of which are a legal obligation. We have consulted our tenants in the development of the draft revised policy and will continue to do so until the process is complete. In addition, we are legally required to publish our draft revised policy publicly so that those on the Housing Register waiting to be housed may comment on

the proposed changes. We must also submit our draft revised policy to the Mayor of London as part of this public consultation period.

6. Members are invited to discuss and agree the draft revised policy and the proposed changes at the September's Housing Sub-Committee meeting in order that any final amendments may be made before we publish it for public consultation. The final draft policy will be on-line for a 4 week period following the sub-committee and we will inform tenants and applicants of this and how to provide feedback.

Current Position

7. The draft revised policy is based upon detailed consultation sessions and surveys with staff and tenants and a review of the changes open to us through the Localism Act (2011). 330 tenants returned consultation surveys (17% of all tenants) and over 20 attended two in-depth sessions in June. The majority of tenants responding to the consultation have been in favour of the proposed changes.
8. It is hoped that the revised policy both protects existing tenants and offers those in housing need on the waiting list a greater chance of securing accommodation with us by the removal of some groups of people who we believe could access housing in the private sector or with another Local Authority if they have no City connection. We have made it clear that these exclusions are reflective of the current acute shortage of social housing and high levels of demand and will be revised in a policy review 3 years after the final revised policy is adopted.
9. The final agreed draft will be published on the website for 4 weeks. Feedback will be considered and changes made where this is felt appropriate, or where we are legally advised to do so.

Options and Proposals

10. Continuing with our old Allocations Policy was not considered an option given the large-scale national changes and how increasingly out-of date our policy is becoming. The following therefore sets out

the key proposed changes to our Allocations Policy based on the review and consultation feedback we have received so far. We believe that these changes will update, balance and streamline our policy and make it more tailored to our needs as the City of London.

- **Scrapping the points system and introducing a banding system**

We are proposing this change to simplify the allocations process for applicants and staff. Most social landlords who operate a Choice Based Lettings system (as we have since 2010) operate a banding system for allocations. This change therefore updates our policy and is welcomed by staff and was supported by tenants in the consultation feedback we received. We propose four bands:

- Band 1: High housing need
- Band 2: Medium housing need
- Band 3: Low housing need
- Emergency Band: this is for people who have an immediate/critical need to be re-housed. People in such exceptional circumstances will receive a direct offer of accommodation and will not have to apply through the Choice Based lettings system (this is as now).

- **Excluding applicants whose total household income is over £60,000 and applicants who have savings or capital over £30,000**

We are proposing this as we believe such people can financially access private housing (rented or sale). The current average salary for London is £26,000 so this cap is above this for a couple and so is not overly restrictive and still allows working applicants access to our housing. We make clear that this is reflective of the current housing shortage and high demand for housing and that we will review this in the next policy review where it could be reversed. This only affects 2 people on our current waiting list, but it is a move designed to protect our social housing as higher earning people increasingly turn to social housing providers to meet their housing needs.

- **Providing extra priority for low-paid City workers (households earning under £26,000) Proposed Band 2**

We are proposing the introduction of this extra priority to support those who work in the square mile on low wages, for example those who work in the hospitality or administrative sectors or those who are cleaners or security guards in the square miles' businesses, hospitals, schools etc. This supports the City's traditional role in providing affordable housing for people working in the City, reflecting the fact that all of our estates are within easy reach of the square mile.

Many low paid workers living in the private rented sector have to claim housing benefit and there is evidence showing that such people are having to move even further out of London as benefit levels are being reduced with the introduction of the Welfare Reform Act (2012) (particularly for those aged under 35). This is resulting in some people unable to work in central London as transport costs are too much of a burden or they simply cannot manage the travelling time with caring responsibilities. The introduction of this priority will therefore support such workers who help to keep the square mile functioning. The Government is also keen for Local Authorities to provide extra priority for working applicants.

- **Providing clarity for the priority given to ex-armed forces personnel. Proposed band 2 or 3.**

Such applicants would already receive priority but we intend to make this clearer based upon tenant feedback.

- **Excluding applicants who do not have a City connection**

This change is designed to ensure our housing goes to people who have a proven connection, whether through family, work, or roots to the City of London. This is common practice amongst the housing sector. Currently we have 232 applicants on the waiting list who have no City connection and we are proposing to exclude these to reduce our total waiting list, as well as applying it for new applicants.

- **Giving extra priority to existing tenants who want/need to down-size their property. Proposed band 1.**

We are proposing this for two main reasons: one, we have a shortage of larger family accommodation and so want to offer greater

incentives for people under-occupying (living in a property larger than their household needs) to give up their property and move to a smaller one. Two: with the impact of welfare reform, we will have 70 households from April 2013 who will face housing benefit cuts for under-occupying, therefore we need to increase the priority for tenants to downsize in order that they can move more quickly into a smaller property and afford to continue paying their rent.

- **Changing the priority awarded to applicants who are sons and daughters of City of London tenants. Proposed Band 2 or 3.**

The City has always maintained this policy (giving sons and daughters priority for housing) even when most social landlords abandoned it from the 1990s. Our current policy gives them priority over most other applicants regardless of their housing need. Whilst we want to still support these family ties on our estates, we are proposing that they be awarded a Band 2 rather than the equivalent of Band 1 as it currently operates. We are therefore retaining this policy but are balancing the needs of all applicants on the waiting list at this time of high housing need and shortage of supply. We only have about 60 applicants (5.3% of all applicants) who are sons or daughters of a tenant therefore it is not something used by the majority of our residents. The majority of tenants were in favour of this proposal as highlighted in the consultation feedback we received.

Clarifying our arrangements for 16 and 17 year olds and care leavers.

We are currently working with colleagues from across the Department to ensure this policy adequately supports such young people and that we join up our services effectively. Further details will be provided at the sub-committee meeting.

Applying these changes

11. We are recommending that above proposed changes would apply to applicants already on the Housing Register, as well as to new applicants. This is because we need to reduce the number of people waiting for housing so that those we award priority to get a better chance of securing accommodation with us. This would mean that all applicants would be written to (after the final policy has been

approved) and informed of the new band awarded to them. Some may be told that they no longer qualify for our housing.

12. In order to do this, staff would need to reassess all applications in advance of this letter to determine which bands to be awarded or which people need to be removed. We envisage this will take three months to complete and are currently exploring the most cost effective way to do this as it could not be done within existing staffing resources.
13. However, we would not intend to apply the changes to applicants who are our tenants (tenants who are on the transfer list) as this is removing something they had the right to. This is not the case for those applicants who are not existing tenants.
14. All applicants retain the legal right to appeal against a decision we make. Given the large number of reassessments, we would expect a higher number of appeals to be lodged and are considering options for a Panel to deal with these, which we will discuss further at Housing Sub-Committee.

Corporate and Strategic Implications

15. Applying the proposed changes would remove applicants from the Housing Register who are financially able to move into private housing and who have no connections to the City of London. Such applicants take up valuable staff time enquiring about their applications, some on a weekly basis, even though they are informed that they are unlikely ever to receive housing from us.
16. Clarifying and streamlining our approach will increase efficiency in this area of our work as applicants better understand a band system than a complicated points system. All of this helps us to contribute to the Departmental Business Plan strategic aim of 'Making best use of resources and improving the way we work' and the Corporate Plan aim of 'Seeking to maintain the quality of our public services whilst significantly reducing our expenditure and improving our efficiency'.

Financial and Risk Implications

17. Reviewing our Allocations Policy helps to mitigate against the risk of legal challenges in this area and provide a better service as we update our policy and procedures. However, there are some risks to be managed in the process which we will seek to manage by ensuring we:

- properly consult through-out the process so stakeholders have chance to comment on developing the draft and final versions
- think-through the proposed changes and identified the affects to out tenants, to applicants, and to ourselves to minimise future challenges
- effectively communicate the agreed changes to minimise negative reputational impact and maximise the positives (changes to social housing allocations policies now regularly make the headlines in related press)
- effectively plan for temporary additional resources to make the changes to existing applicants in a timely manner

18. There will be a temporary financial cost to secure additional resource to carry out the reassessment of all existing applications, equivalent to a full-time post for three months (initial estimate which will be firmed up before the final policy report). There will be the cost of printing up summary copies of the Policy to be displayed in our estate office receptions and provided to people upon request (within existing communications budget).

19. We have conducted a Stage 1 Equalities Impact Assessment and have concluded that there is no requirement to conduct a Stage 2 assessment as there is no disproportionate impact upon any of the groups defined by, and protected by, the Equalities Act (2010). Please see Appendix 2 for the results. However, this will be reviewed after the public consultation has been carried out.

Conclusion

20. This report presents the draft revised social housing Allocations Policy for discussion and approval before it goes out to statutory

consultation. It is a core policy for the City's Housing Services and one that must be reviewed thoroughly in order to ensure a robust policy to meet national requirements and local needs.

21. Members will be presented with a final policy for approval in November 2012, or January 2013 if there are any major changes to be made as a result of the statutory consultation.

Contact:

Carla Keegans
Head of Involvement and Policy
Housing Services

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City of London

Draft Housing Allocation Policy and Scheme
2012

Version 1
24 August 2012

Contents

1. Introduction
2. Aims of this policy
3. Who is, and is not, eligible for our housing
4. Who we will accept onto our Housing Register and how decisions are made and priority awarded
5. 'Step by step' of the allocations process
6. Frequently Asked Questions about:
 - Having more than one housing need
 - How we assess what size property you are entitled to
 - Allocations made outside of this policy
 - How long it takes to get housed
7. Changes in your circumstances and reviewing our Housing Register
8. Bidding for available properties through our Choice Based Lettings scheme

Appendix 1 – Appealing against our decision

Appendix 2 – City of London boundary map

1. Introduction

As a Local Authority landlord we must by law have in place a policy that sets out how we allocate people into our own properties for rent, and to those properties where we have nomination rights (for example housing associations within our Borough). This is to make sure our publicly subsidised housing is used in the most appropriate way.

We keep a '**housing register**' of all the people who have successfully applied for housing with us. This policy sets out who we will, and will not, accept onto our housing register and what priority those accepted will be given. We regularly review the housing register to ensure only those who remain in housing need are kept on it and will take legal action against those found to be making a fraudulent application.¹

This policy was agreed by the City of London's elected Housing Sub-Committee on xx 2012 and sets out who we will accept onto our housing register, how to apply to get on our housing register, what happens when the decision has been made, how to bid for our available properties, and how to appeal against a decision if it has not found in your favour. We reviewed our previous policy and have made changes to reflect some major current factors as well as changes to the law that affect the allocation of social housing.

We have set some clear **aims** that we want to achieve through this policy and we have been open about who we will no longer allocate housing to and the reasons why. We will review this policy in three years' time where these changes may be reversed if demand for our housing has eased.

We have carried out an Equalities Impact Assessment and have concluded that our revised policy does not have any major negative or positive impact upon any on groups as defined in, and protected by, the Equalities Act (2010). (This statement may change if the public consultation results deem that there is an impact).

Whilst we have tried to be clear and fair in our new policy, it must be acknowledged that no allocations policy or scheme can cover for every eventuality. Therefore we reserve the right to deviate from the process laid down in this policy where exceptional circumstances mean someone requires more help than they may otherwise be entitled to. In addition, we reserve the right to review our policy earlier than three years if a change in national policy/law affecting the allocation of social housing comes into effect.

¹ In accordance with S.171 of the Housing Act 1996 anyone found guilty of attempting to obtain accommodation by deliberately giving false information or withholding information pertinent to their application is liable to be prosecuted and fined up to £5000. We will use all available means to prosecute anyone suspected of such an offence.

2. The aims of our allocations policy

Through this policy we aim to:

1. Achieve a balance between the housing needs of existing City of London tenants and those applying to be new tenants.

Why this is important: Previously, our existing tenants who wanted to transfer to another one of our properties often received more priority than people on our housing register who may have been in greater housing need. Whilst we still allow transfers, we will now take into account housing need when assessing transfer requests. At this time of incredibly high housing need, we must look to ensure those in great housing need are able to access our properties too.

2. Make the best use of our housing stock in this time of extremely high demand for social housing.

Why this is important: there is currently a huge shortage of social housing and extremely high levels of people in housing need. Whilst in an ideal world we would be able to offer housing to everyone, in these times, we must ensure those who most need it, overall, receive priority. At this time of significant changes to the welfare system, we must also ensure people are able to down-size their properties (move to a smaller property), and are not offered accommodation that they will not be able to afford.

3. Be clear about who we will allocate to, the processes to follow, and the advice we give on alternative housing options.

Why this is important: allocating social housing is an important role for Local Authorities and we must ensure all applicants (potential and existing tenants) are clear about the process, what they have to do, and how we will make our decisions.

4. Efficiently let our properties to reduce the amount of time properties are empty.

Why this is important: at this time of tight public finances, we must ensure that our allocations and lettings processes work as seamlessly as possible so that after a tenant has given us notice we then allocate that property before it becomes empty so a new tenant can move in as soon as it becomes empty.

5. Help achieve our wider strategic aims as contained within our Business Plan, notably; providing safe, stable and vibrant communities.

Why this is important: who we allocate into our properties has an impact upon our estates, therefore whilst we make decisions based on housing need, we also take into account overall the impact on our estates to ensure we maintain estates that are desirable places to live.

3. Who is eligible for social housing

Anyone who is 16 years of age and over² and does not fall into one or more of the groups below is eligible for social housing. However, being eligible does not guarantee an offer of accommodation and the next section sets out how we make decisions between eligible people who apply for housing from us.

Who is not eligible to be included on our Housing Register

A. Anyone found guilty of behaviour serious enough to make them unsuitable to be the tenants of a Council or Housing Association at the time of their application.

Unacceptable behaviour is considered to be behaviour which, if the person concerned were a secure council tenant would entitle us to seek a possession order under one or more of the grounds in Schedule 2 of the Housing Act 1985.

This would include:

- Failure to pay rent
- Breaching conditions of the tenancy agreement
- Causing nuisance to neighbours
- Being convicted of using their homes for immoral or illegal purposes
- Being convicted of an arrestable offence committed in, or in the vicinity of their home
- Causing the condition of the property to deteriorate by a deliberate act, or by neglect
- Making a false statement to obtain a tenancy

B. Anyone who is subject to immigration control within the meaning of the Asylum and Immigration Act 1996 (unless the Secretary of State has stated that they should be eligible for housing).

C. Anyone who owns a property in the UK or abroad.

We have also introduced the following two categories of people who we will not accept onto our housing register. This is reflective of the current acute shortage of social housing and high levels of people in housing need. We believe that people in these two groups would be able to access property in the private sector.

D. Anyone who has an annual income of £60,000 or more before tax (for the whole household).

E. Anyone who has savings or capital of £30,000 or more (for the whole household).

Please note: We are checking with Legal if we can also exclude: people previously evicted from a social housing tenancy, people who exercised the RTB, sold it, then want to be a tenant again, people who have a history of abusing staff. Further details will be given at the meeting.

² Anyone accepted onto our Housing Register who is aged 16 or 17 will only be accepted if they have a rent guarantor AND... any other conditions we'd impose, e.g., living in supported housing until 18 – this needs to be agreed and further information will be given at Housing Sub-Committee.

4. Who we will accept onto our Housing Register and how decisions are made and priority awarded

To be included on the Housing Register you:

- Should currently live in the City of London³ **and** have done so for a minimum of 12 months **or** have been employed in the City of London for a minimum of 12 months (including working for the City of London Corporation but located outside the City) **or** be a child of a City of London tenant who has always lived at home, **and**
- Should fall into one or more of the ‘reasonable preference’ and/or ‘qualifying’ groups (as set out in tables 1 and 2 below).

Unfortunately, we are unable to accept other people onto our Housing Register due to the high level of housing need and demand for our housing. (That said, we reserve the right to offer an allocation of property where there may be exceptional circumstances, as assessed on an individual basis). Our policy will be reviewed in three years’ time⁴ (2015) where this may change if demand for our housing has eased.

What are ‘Reasonable Preference’ groups?

The law sets out groups of people to whom we must give ‘reasonable preference’ to when allocating our housing. This means that they must be given overall priority within our allocation scheme. This doesn’t mean they have to take priority all of the time. **Table 1** lists the reasonable preference groups and what priority they will be given.

What are ‘Qualifying’ groups?

In addition to the above groups, we are also allowed by law to specify other groups of people we will accept onto our list as relevant to our local circumstances. We have introduced two qualifying groups as set out in **table 2** below. We will accept people onto our housing register if they fall into one of the qualifying groups even if they do not fall into one of the reasonable preference groups, this is because these groups are important to the City of London.

What are the different levels of priority?

- If you are included on the housing register you will be placed in one of four Bands.
- Your position within a Band is based on waiting time.
- This begins from the date that you were awarded that Band.

We believe that a banding system is the simplest and most transparent way of managing the Housing Register. We have abolished the previous points system.

³ The City of London’s Local Authority area is often referred to as the ‘square mile’. Please see Appendix 1 for the map of the ‘square mile’ so you can see if you live/work within it.

⁴ Or sooner, if there is a major change of Government policy affecting housing allocations.

You will be placed in one of the following Bands:

Band 1 = Those with a high housing need

Band 2 = Those with a medium housing need

Band 3 = Those with a low housing need (we expect this to be a small number of applicants only)

Emergency Band = This is a restricted band for those with a critical/immediate need to move and is awarded at a Manager's discretion.

Who is priority awarded to?

As the availability of social housing is very limited, only eligible people assessed as having a priority in accordance with the Reasonable Preference and/or Qualifying categories will be included on our Housing Register.

This is so we only include people on the Housing Register who we believe stand a reasonable chance of securing a move into social housing.

We will also use '**additional preference**' criteria to decide if some applicants need a higher band, these are set out in table 1 below.

The following tables set out who we will accept onto our housing register and what priority they will receive:

Table 1: 'Reasonable Preference' categories:

Reasonable Preference Group	Band	Additional Preference criteria	Higher Band	Explanatory Information
1. Homeless households	We will assess all applications according to the 'additional preference' criteria...	People who are assessed as unintentionally homeless and in priority need.	1	Homelessness is assessed according to the meaning of Part 7 of the 1996 Housing Act, which includes those unintentionally homeless or in priority need. All accepted applicants must have a connection to the City of London.
		People who are assessed as intentionally homeless and in priority need.	2	
		People living in City allocated temporary accommodation (TA) for over 6 months.	1	

Reasonable Preference Group	Band	Additional Preference criteria	Higher Band	Explanatory Information
2. People who are owed a homelessness duty by any housing authority	1	People who face a critical / immediate need to move.	Emergency band	People who may be accepted under this category do not have a City connection and may include young people leaving care, people fleeing domestic or gang violence, unaccompanied minors, etc.
Reasonable Preference Group	Band	Additional Preference criteria	Higher Band	Explanatory Information
3. People living in unsatisfactory housing conditions, including overcrowded or insanitary conditions.	We will assess all applications according to the 'additional preference' criteria...	People occupying extreme insanitary or unsatisfactory housing conditions.	Emergency Band	We will always carry out an assessment in these cases. This will be carried out by the City's Environmental Services Team if the applicant lives within the City, or by the London Borough where the applicant currently lives. Only in exceptional cases, where a prohibition notice is required, will an applicant be placed in the Emergency Band.
		People occupying accommodation that is overcrowded by two or more bedrooms.	1	How we assess overcrowding is explained on page 12.
		People occupying accommodation that is overcrowded by one bedroom.	2	Consideration will be given to each case individually.





Reasonable Preference Group	Band	Additional Preference criteria	Higher Band	Explanatory Information
<p>4. People who need to move on medical or welfare grounds, including relating to a disability.</p> 	2	<p>People with a severe medical need including those who require adapted accommodation.</p> <p>*People with a learning disability who are ready for independent living.</p> <p>*People who are ready to move on from Supported Housing (including care leavers, and ex-City rough sleepers).</p> 	<p>1</p> <p>1</p> <p>1</p>	<p>Medical priority is not awarded solely on the existence of a health problem. It is only awarded where the health of an applicant or a member of their household is made significantly worse or prevented from improving by their accommodation to such a degree that the circumstances have, or are likely to become, life threatening and would be demonstrably improved by a move to alternative accommodation.</p> <p>Our medical assessments are carried out by an external qualified organisation called 'Now Medical'.</p> <p>*Notification for these priorities will be provided by the City's Adult or Children's Services teams.</p>
Reasonable Preference Group	Band	Additional Preference criteria	Higher Band	Explanatory Information
<p>5. People who need to move to the locality and if they didn't do so would cause hardship to them or someone else.</p> 	Discretionary.	<p>We will assess all applications on their individual merit. As the City is such a small area, we do not get many applications under this category.</p> 		<p>An example of this may include someone who is a full-time (unpaid) carer and needs to live close to the person they care for.</p>

Table 2: Qualifying categories

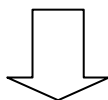
People can be accepted onto our list if they fall into one of these groups *even if they do not fall into one of the reasonable preference groups*. If an applicant meets one of these groups but is assessed as having a housing need according to the Reasonable Preference categories in table 1, then they will be awarded this band which may be higher.

Qualifying Groups	Band	Explanatory Notes
<p>1. Existing City of London tenants who are under-occupying. (Tenants who wish to transfer to another City of London property and who are ‘down-sizing’ by 2 or more bedrooms (or by 1 bedroom if they are giving up a 2 bed property)).</p>	<p>1</p>	<p>We will continue to offer financial incentives for existing tenants to down size their property if they no longer need all of their bedrooms because we have a shortage of larger family homes for rent.</p> <p>We have made this a higher priority now because many tenants may be forced to downsize with the impact of welfare reform.</p>
<p>2. Low-paid City workers* (People who have worked for a minimum of 12 months in a job(s) within the ‘square mile’ whose total household income is less than £26,000 per year).</p>	<p>2</p>	<p>*This only applies to new applicants.</p> <p>The City has history of providing affordable housing to people who work in lower paid jobs within its Local Authority area (the ‘square mile’).</p> <p>All of the City’s estates are within easy access to the ‘square mile’ and so we will allocate to any of our housing estates, not just those within the square mile itself. £26,000 is the average London wage and is also the new total household benefit cap.</p>
<p>3. Sons and Daughters of City of London tenants (Sons and daughters who have always lived with their parent(s) who are a secure tenant(s) of the City of London).</p>	<p>2 or 3</p>	
<p>4. Ex-armed forces personnel</p>	<p>2 or 3</p>	

5. How we assess applications – step by step

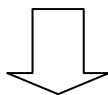
Step 1: Submitting your application form

- People wishing to apply for the City of London’s council housing must fill out and return the application form that can be found on our website at: www.cityoflondon.gov.uk/housingapplications



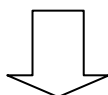
Step 2: Assessing a ‘Reasonable Preference’ criteria

- Once we receive your application we will assess it to determine which, if any, reasonable preference categories you fall into.
- Where you fall into one category, we will award this band, where you fall into more than one with different bands, we will award the higher band.
- If you do not fall into any of the reasonable preference categories, we will then assess your application as per step 3 below.



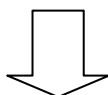
Step 3: Assessing a ‘Qualifying Group’

- We will assess all applications (whether they fall into a reasonable preference criteria or not) to see if your application meets one of our qualifying groups.
- If it does then you will be awarded the relevant band, unless you have a reasonable preference that has a higher band, in which case you will still receive the higher band.



Step 4: Telling you our decision

- Once we have made a decision we will tell you in writing what it is, within 30 days of receiving your application form.
- If you have been accepted onto our Housing Register then you will receive information about how to bid for available properties.
- If you have not been accepted we will provide you with advice on other housing options you may wish to pursue.



Step 5: Appealing against our decision

- You have the right to appeal against our decision if you do not agree with it.
- You should do this in writing and we will respond in writing within 10 days⁵

⁵ Please see Appendix 1 at the end of this Policy for more details on how to do this.

6. Frequently asked questions about our allocations process:

What if you have more than one housing need?

If you have more than one priority in the Reasonable and / or Qualifying groups, you will not be awarded a cumulative priority. Your application will be placed into the highest band as assessed in the Allocation Scheme, for example:

- Someone with a Band 2 and Band 3 priority would be placed into Band 2
- Someone with multiple Band 2 priorities would remain in Band 2

How do we assess the size of property you require?

If you have more bedrooms available than your household needs, you are under-occupying the property.

If you have fewer bedrooms available than your household needs, you are overcrowded.

We allow one bedroom for each of the following:

- a person living together with another as husband and wife or partner (whether that other person is of the same or opposite gender)
- a person aged 18 years or more
- two persons of the same gender aged 10 years to 18 years
- two persons (whether of the same gender or not) aged less than 10 years
- two persons of the same gender, where one person is aged between 10 years and 18 years and the other is aged less than 10 years.
- any person aged under 18 years in any case where he or she cannot be paired with another

(Each person is only counted once in the first group they would come into).

- Single people are entitled to a studio (bedsit).
- Pregnant single women are entitled to a studio (bedsit) and can apply for a 1 bedroom property after the birth of their child.

Allocations made outside of this process

Not every allocation of a property we make will be based on the process set out in this policy, for different reasons, some of the main ones are set out below:

‘Sheltered’ Accommodation: applicants wishing to live in one of our sheltered schemes (for people aged 60 years and above) will be asked to complete a separate application form which uses different criteria to the one used for our other housing (known as ‘general needs’ housing). Applicants who apply for housing using the standard application form, and who are aged over 60, may be invited to apply for our sheltered housing if it looks like they will not receive much priority for our general needs housing.

People occupying extreme insanitary or unsatisfactory housing conditions; subject to an assessment of this, may be placed in the emergency band and will receive a direct offer of accommodation and do not have to apply for properties through the Choice Based lettings scheme.

People who face a critical / immediate need to move: such as those fleeing domestic violence, harassment, young people leaving care, may be placed in the Emergency band and will receive a direct offer of accommodation and do not have to apply for properties through the Choice Based lettings scheme.

How long it takes to be housed

There is no set amount of time it takes for a property to be allocated to you. The higher bands will usually get housed quicker than the lower priority bands but this only a rough guide.

The length of time you have been on the Housing Register is a factor we take into account when making decisions.

For example, if two applicants equally qualify for an available property, it will normally be offered to the applicant who has been on the Housing Register the longest. Your length of time on the Housing Register starts from when you are accepted onto the register.

Bidding for a range of properties in a range of our areas will increase your chances of being allocated a home (see next section on how to apply for available properties).

7. Changes in your circumstances and reviewing our Housing Register

It is your responsibility to advise us of any changes in your circumstances. This includes a change of address or if someone leaves or joins your household.

Failure to notify us of a change in your circumstances might mean that you miss out on an offer of accommodation or could result in the cancellation of your Housing Register application. If you intentionally withhold information in order to attempt to secure accommodation you may be prosecuted and fined up to £5000.

Once you notify us of a change in your circumstances you will be asked to complete a 'Change of Circumstances' form, and your application will be suspended until this is returned with proof of new circumstances.

If the change in your circumstances means that you no longer have a priority in accordance with the Reasonable Preference or Qualifying categories your application will be cancelled.

If the change in your circumstances causes either:

- a change in your Banding priority ; or
- a change in the number of bedrooms you require (even if your Band remains the same)

then your waiting time will begin again, unless your banding remains the same.

Every year we will conduct a census of all households on the Housing Register. This will be sent to the address we have for you. It is vital that you inform us of any change in your circumstances as if there is no response to the census your application will be suspended or cancelled.

Reviewing your application

We review the details of households included on the Housing Register. We do this to ensure that you are bidding for properties and are not turning down accommodation as well as to ensure that the information that we hold is up to date and accurate.

From time to time we may contact you. For example we may:

- Request additional information.
- Enquire whether you want to remain on the Housing Register.
- Give you a deadline to place a successful bid and accept an offer of accommodation (e.g. if you have been placed in temporary accommodation by the City of London).

You must ensure that you respond to us within any deadlines that we give. If you do not respond to us your application may be suspended or cancelled or we might make you a final offer of accommodation in discharge of our duty to you (where applicable).

8. Bidding for available properties through our Choice Based Lettings scheme

Once you are accepted onto our Housing Register we will give you written information about how you can apply for our available properties.

Advertising Properties:

A user guide to Choice Based lettings will be sent to you once you have been accepted onto the City of London's Housing Register.

Properties are advertised weekly on the City Home Connections website www.cityoflondon.gov.uk/choice

Each bidding cycle begins at midnight on a Wednesday and closes the following Monday midnight.

Only those who are included on the Housing Register will be able to express an interest by "bidding" on properties that are advertised.

You can place up to 2 bids each week on properties for which you meet the criteria.

During the bidding cycle you can withdraw or swap the bids you have made.

Once the bidding cycle closes you cannot withdraw, change or add to the bids you have made.

Properties may be advertised with "preference to" criteria specified. In these instances, bids from applicants who do not meet the preference criteria may be bypassed. For example, if an adapted property is advertised with preference to those who require that level of adaption, bids from able bodied applicants may be bypassed.

Bidding:

If you place a successful bid you will be contacted by a City of London officer. You will be required to provide information confirming your circumstances before you are formally offered a property. If you fail to provide the required information you will not be offered the property and your circumstances will be reviewed.

If your bid is not successful you will not be contacted.

If your bid is bypassed you will be able to view the reason for this by logging into your Home Connections account.

Please note that your bid will be bypassed if you have rent arrears, or may not be accepted if your existing property is in a poor condition where works would be needed in order to relet it.

Accepting a Property:

If your bid is successful you will be invited to view the property and will have to accept or reject the offer at the viewing stage. Usually you will not be granted extra time within which to make a decision.

If you accept a property your details will be removed from the Housing Register and you will not be able to make any further bids.

Turning Down a Property:

If you turn down 2 properties that would reasonably meet your housing needs, you will have your application reviewed and the following may apply:

- Your Housing Register application may be suspended.
- Your Housing Register application may be cancelled.
- You may be made a direct offer.

Publishing Results

Details regarding successful bidders will be advertised on the “**this week’s lettings and results**” section of the City Home Connections website. The published information will show the band, and the date that it was awarded, of the successful bidder.

Appendix 1

What happens if you don't agree with a decision we have made?

You are able to request a review of the following:

- The assessment of your application.
- The priority you have been awarded.
- The cancellation of your application.
- The decision to reduce your priority.
- The suitability of any property offered to you.

Please ensure that you title your correspondence Review Request.

The review will be undertaken by a manager who was not involved in making the original decision. The request for a review must be made in writing within 10 working days of you receiving notification of the decision. Your case will be reviewed and you will be informed of any decision within one month of the receipt of your request for a review

How to contact us:

By email: housing.advice@cityoflondon.gov.uk

By post to:

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

Appendix 2

The City of London's local authority area (all applicants must either live within this area or work within it)

Map to be inserted

Appendix 2 – Results of Stage 1 Equalities Impact Assessment (EQIA)

Name of strategy, project, policy: Social Housing Allocations Policy

Department: DCCS (Housing Services)

Officer/s completing assessment: Carla Keegans

The strategy, policy or project		
1.	What is the main purpose of the policy?	To set out to who and how we allocate our social housing properties. (This will be an updated policy to take into account recent legislative changes and current high demand for social housing.
2.	Is the policy affected by external drivers for change?	Partly (as above)
3.	List the main activities of the policy?	To stipulate: <ul style="list-style-type: none"> • our aims for allocating social housing, • who we will accept onto our Housing Register, • who we will not, • the process for how we allocate homes and • how and who we award priority to, • and the process for people to complain if unhappy with decision.
4.	Who implements the policy?	City of London Housing Services
5.	Who will be affected by the policy?	<ul style="list-style-type: none"> • Current applicants on the Housing Register (including existing tenants accepted for a transfer). • Future applicants. • Existing residents on City housing estates

6.	What outcome do you want to achieve, why and for whom?	To achieve a better balance between the housing aspirations of existing tenants and the housing needs of prospective tenants, by taking housing need more into account than currently when allocating properties.
7.	Are any other organisations involved?	No.
8.	Are there any existing assessments or inspections?	No.
9.	Who have you consulted on the policy/?	<ul style="list-style-type: none"> • City of London tenants (via postal surveys and focus groups sessions, involving circa 350 tenants). • Consultation will continue as per the statutory obligation to conduct public consultation too, meaning applicants on our waiting list will also be consulted and the Mayor of London. • We will also continue liaising with our Homelessness Team and external partner organisation to ensure potentially excluded applicants receive the right information and advice.
10.	Who are the main beneficiaries of the policy?	Housing applicants (particularly existing tenants) who are under-occupying and people working in the City on low wages.

The Impact:	Tick the boxes which apply for each 'target group'					
Equality Target Group	Positive Impact		Neutral Impact	Negative Impact		Reason/Comment
	High	Low		High	Low	
Gender						
Women			√			Of those that will be removed from the Housing Register (234) because they lack a City of London connection, 118 (50.4%) are male and 116 (49.6%) are female.
Men			√			
Transgender			√			
Race						
Asian – Asian Bangladeshi; Asian British; Asian Indian; Asian Pakistani; Asian Other			√ (for all)			Of those that would be removed from the Housing Register (234); 131 (56%) are White, 41 (17.5%) are unknown/other/declined to state or not stated. 36 (15.3%) are Black. 22 (9.4%) are Mixed.

The Impact:	Tick the boxes which apply for each 'target group'					
Equality Target Group	Positive Impact		Neutral Impact	Negative Impact		Reason/Comment
	High	Low		High	Low	
Black – Black African; Black British; Black Caribbean; Black Other						
Chinese						
Irish						
Mixed – Asian & White; Black & White; Mixed Other						
White – White British; White European Union; White Other						
Disabled people			√			None of the 234 applicants who would be excluded have a stated disability.
Lesbians, gay men and bisexuals			√			Only 1 applicant out of the 234 that would be excluded is stated as LGBT.
Older people			√			Only 2 of the applicants that would be excluded are older people (aged over 60).
Younger people and children		√				None of the 234 applicants who would be excluded are young people. The revised policy will seek to strengthen our approach to rehousing young people under 18, and care leavers.
Faith groups			√			At the current time we do not record people's religion or faith. This would be recorded with the implementation of the new policy and procedures.

Further Action	
Does the policy have a negative impact on any of the equality target groups? If so, you will need to proceed to Stage 2	No

Is the negative impact assessed as being of high significance? If so, you will need to proceed to Stage 2	No
Is progression to Stage 2: Full Assessment required?	Yes____ No___√___ (at this stage, however a review will be undertaken after the public consultation has been conducted)

Signed (Completing Officer): _____CKeegans_____ Date: _____07.09.12_____

Signed (Departmental Equality Champion): _____ Date: _____

Actions Arising from Initial Screening

Issue	Action Required	Lead Officer	Timescale	Resource Implications	Comments
To analyses impact of proposed exclusion on current waiting list to determine if there is any disproportionate impact on any Equalities group.	Analysis of current waiting list.	Carla Keegans	By 7 Sept. 2012	None	Completed 7 Sept 2012. Results show an even mix of people who will be impacted by the exclusions proposed.

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Agenda Item 8

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Agenda Item 9

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of the Local Government Act 1972.

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of the Local Government Act 1972.

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