

APPENDIX B

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

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

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

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

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

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

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

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

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