

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).

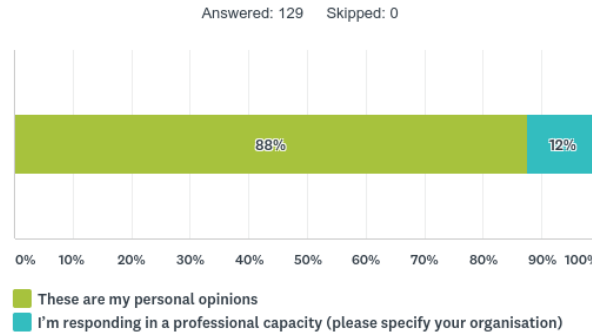
Letters were sent to every household on the waiting list and were included in every tenant's July rent statement. Officers spoke at Residents Open Meetings at Middlesex Street, Avondale Square, Golden Lane and Sydenham Hill, as well as at an event organised and promoted by the Golden Lane Tenants Forum.

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?

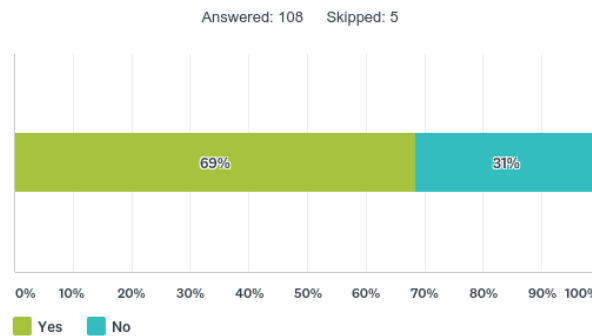


Members of the public made up 88% of respondents and partner organisations made up 12%. The partners to provide a response were:

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

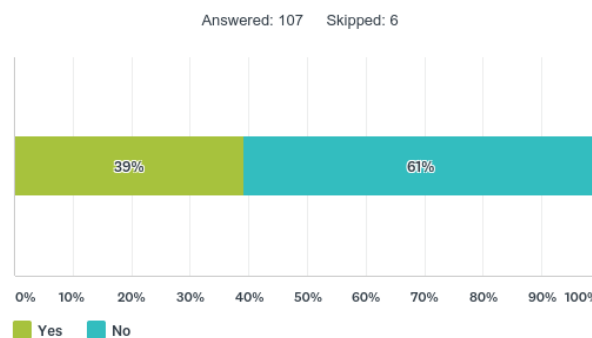
Of those respondents who were members of the public, the majority live within the Square Mile.

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.

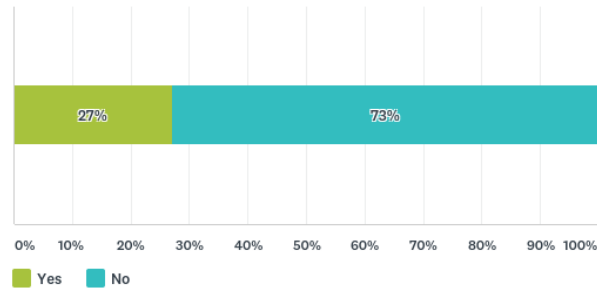
Q3 Are you a tenant of the City Corporation?



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.

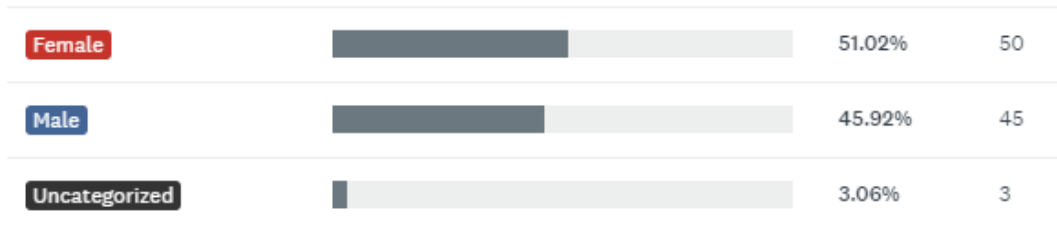
Q4 Are you currently on the City Corporation’s Housing Register (either as a new applicant or as a tenant wanting to transfer)?

Answered: 107 Skipped: 6



Respondents were almost equally split between men and women.

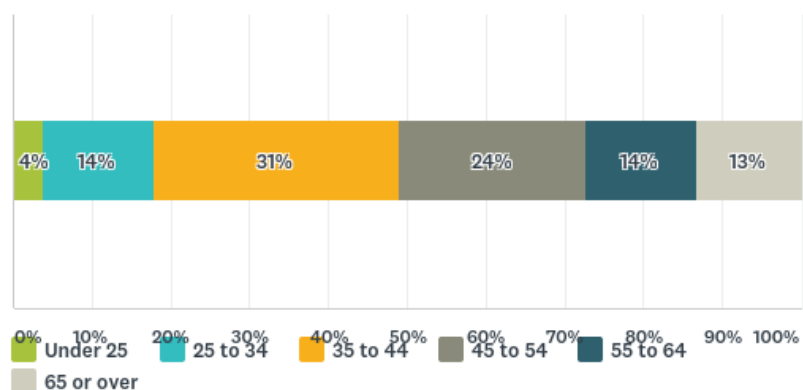
What is your gender?



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

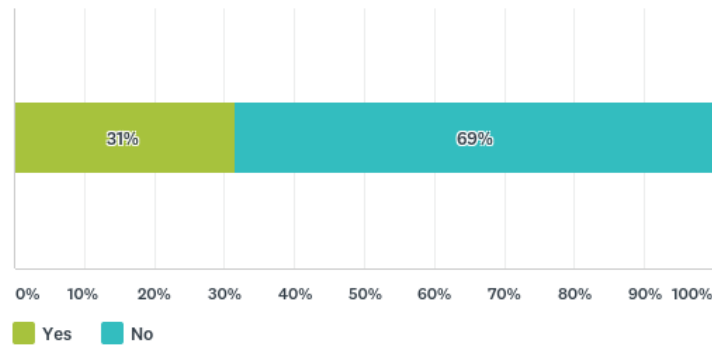


Age Bracket	Survey	City
18 to 25	4%	10%
25 to 34	14%	26%
35 to 44	31%	17%
45 to 54	24%	17%
55 to 65	14%	13%
65 and over	13%	18%

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?

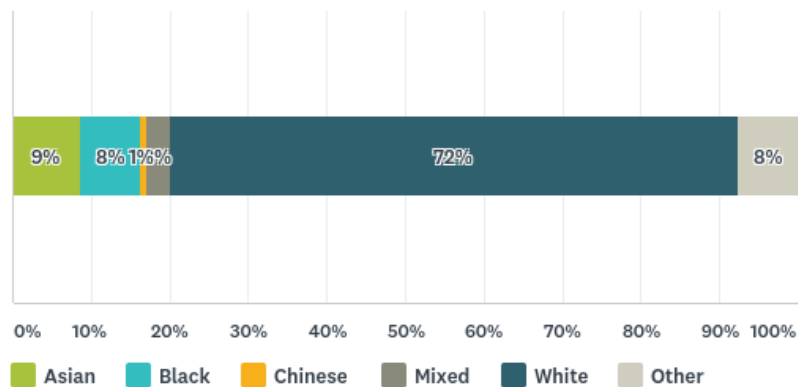
Answered: 105 Skipped: 8



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.

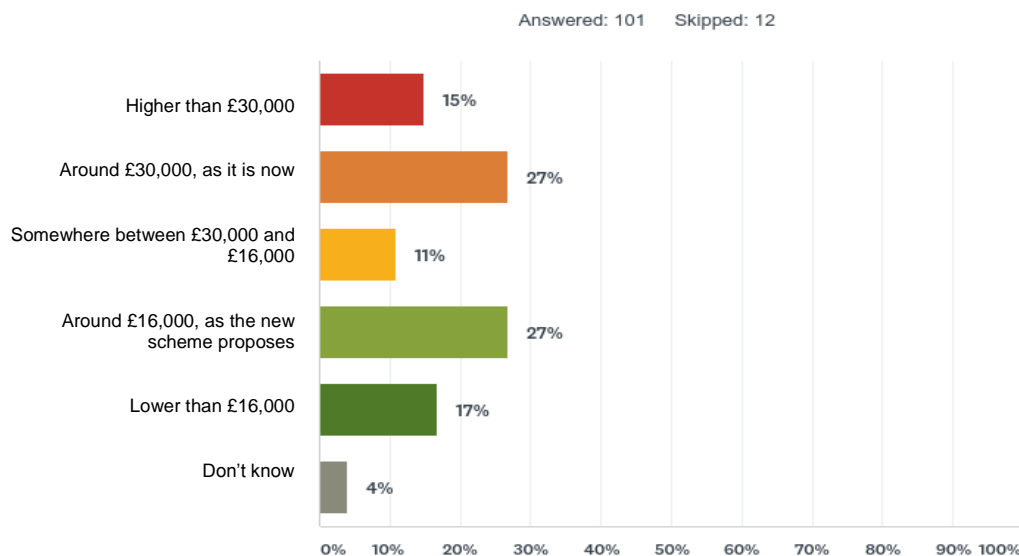
We believe this is enough for someone to rent a home in the private sector and are considering lowering our savings threshold in order to target limited social housing at those most in need.

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.

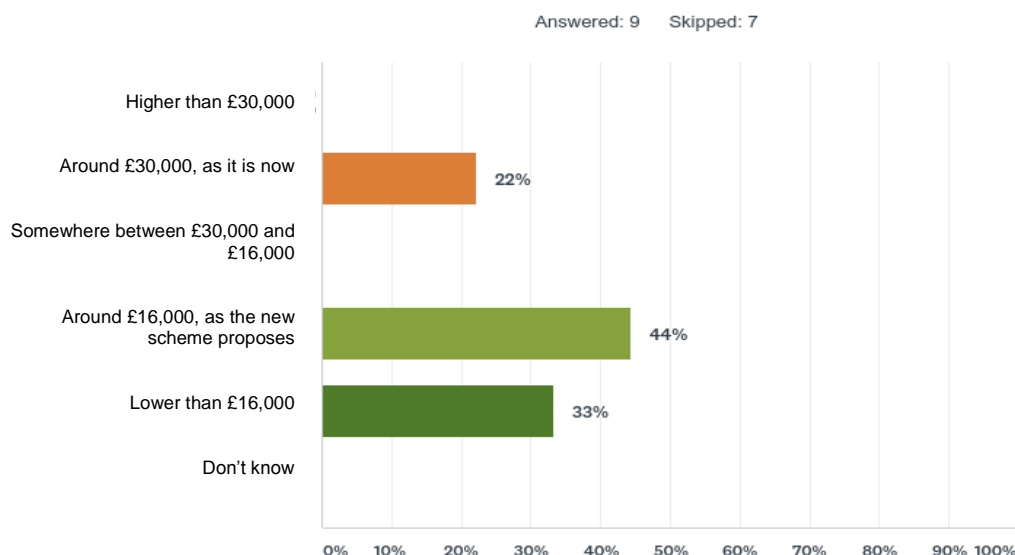
3.1 Survey Data

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.

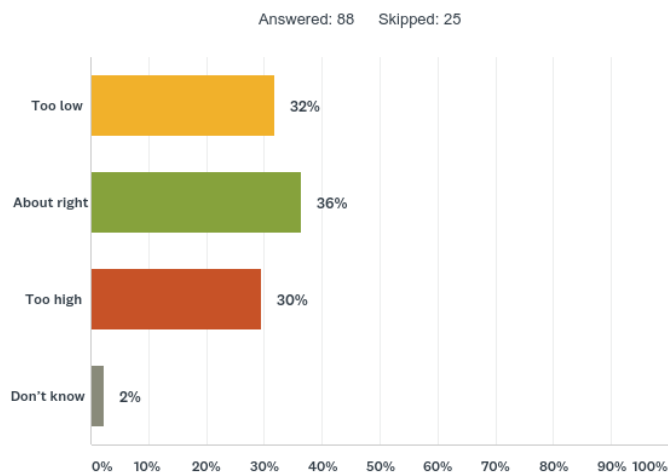
Why not London Living Wage?

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.

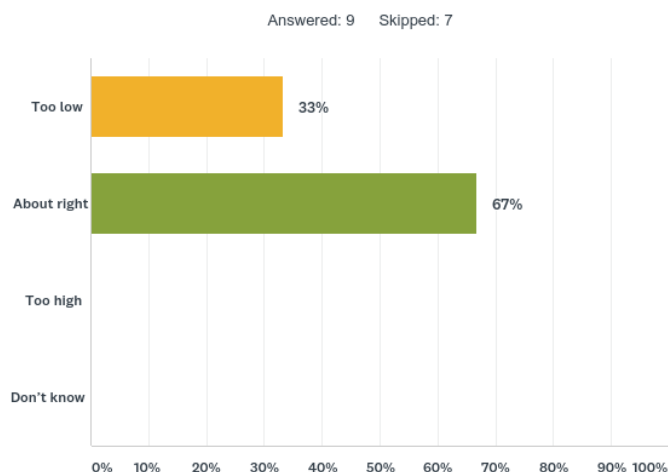
However, raising our criteria this much could mean applicants earning relatively higher incomes may crowd out those on lower incomes most in need of affordable housing. Those earning between £29,640 and £60,000 would still be able to get preference for housing in other ways – for example, if they are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

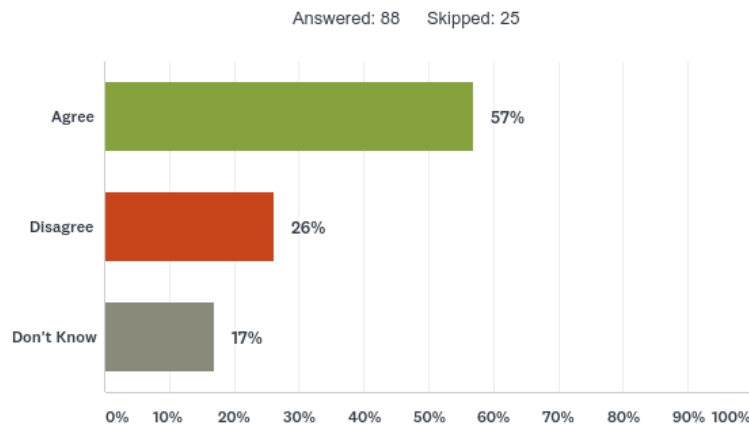
The current Housing Allocations Scheme only offers the 'low income' preference discussed in the last question to people who work in the City of London.

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:

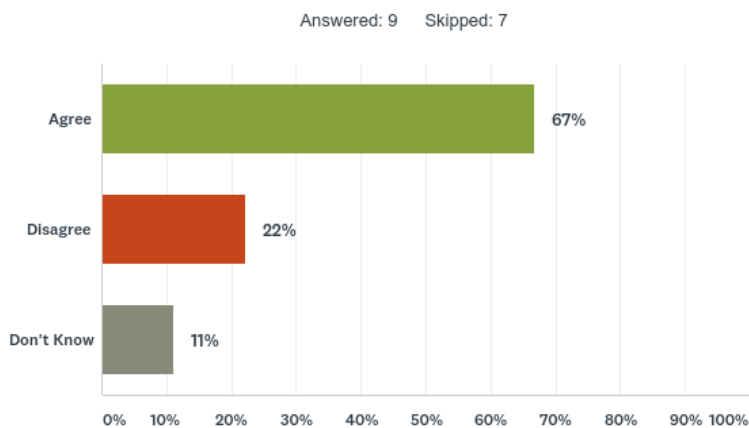
- City residents and sons and daughters of City Corporation tenants who work outside of the Square Mile
- City residents who have recently lost their job
- City residents who are not in paid employment but who experience difficulties paying private rents as a result of recent benefit changes.

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.

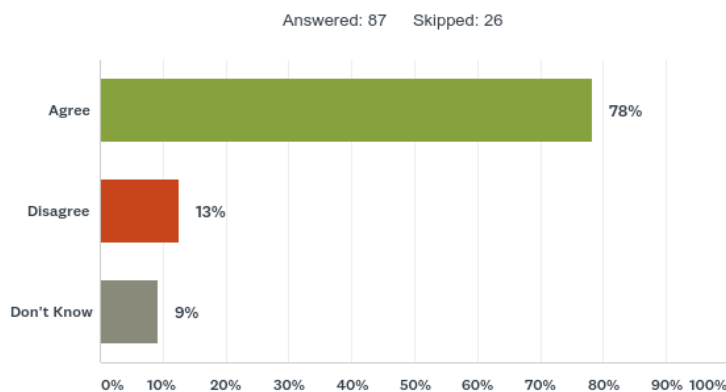
However, because of the current level of priority offered to this group, very few Studio Upgrade transfers take place.

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).

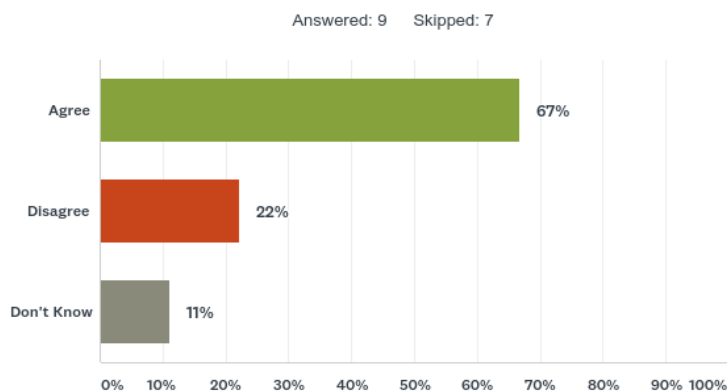
6.1 Survey Data

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)

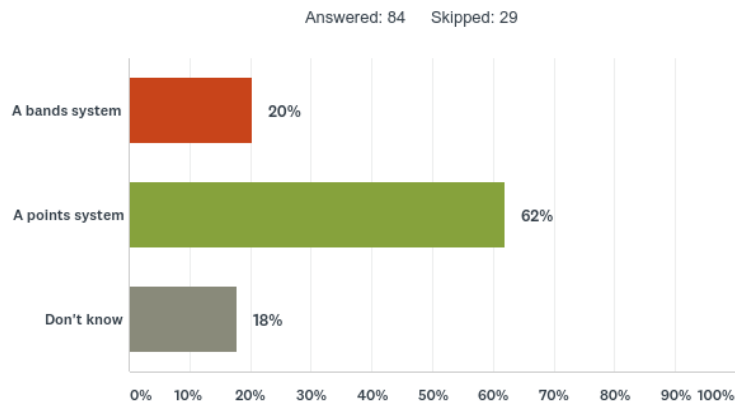
Waiting time: 6 months

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.

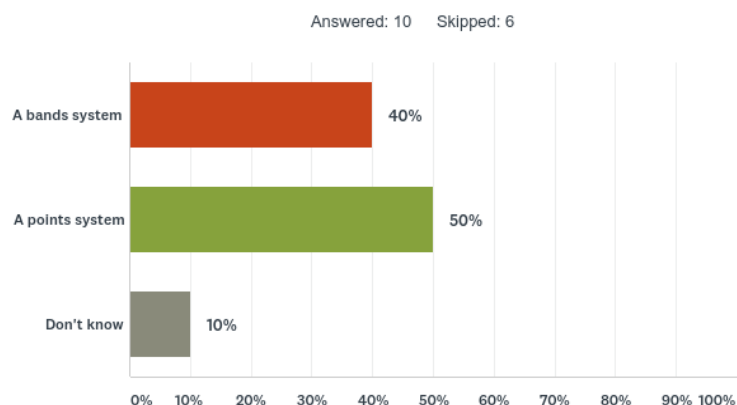
7.1 Survey Data

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.

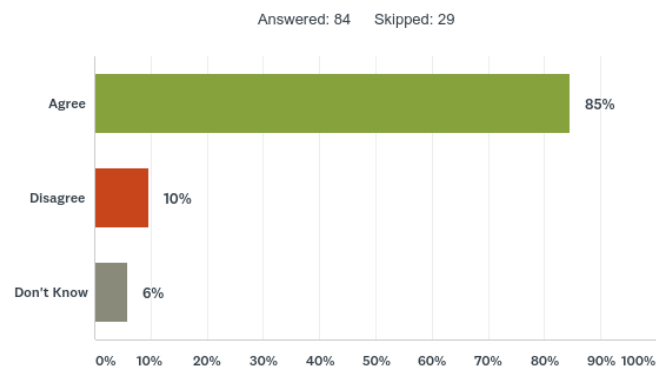
The Williams family also live in a two bedroom flat with their three teenagers and are on the list for a transfer to a larger home. They have one boy and two girls.

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

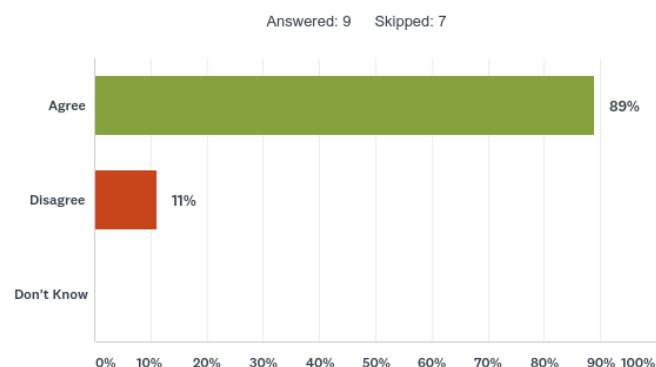
We believe that the psychological effects of overcrowding are worse when siblings of different genders must share a bedroom during puberty. We are proposing offering 10 extra points to families where this is happening. This would mean that the Williams family was offered accommodation first, regardless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

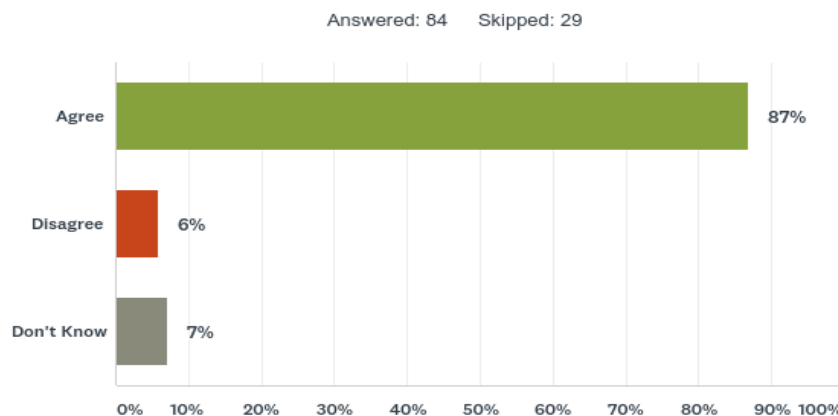
This is a legal term that means someone acted in a way, or failed to do something, that caused them to lose their home. This could be something like anti-social behaviour or not paying rent when they had the money to do so.

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.

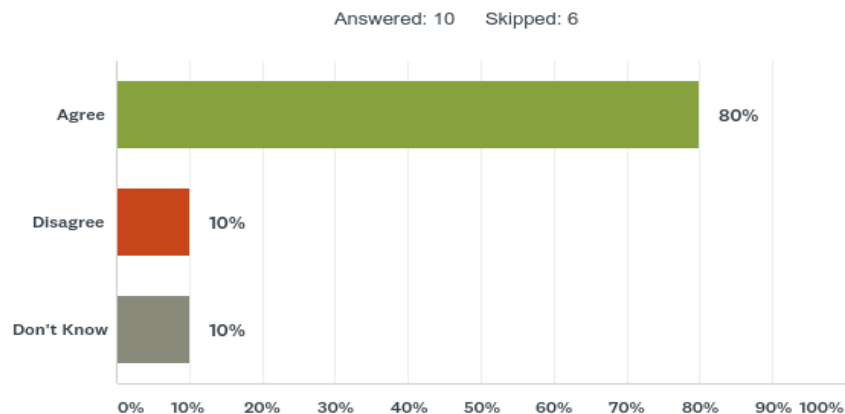
We want to discourage this kind of behaviour as it is unfair to those applicants who genuinely need help to find suitable accommodation.

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.