

SUBJECT:	PROPOSAL TO CONSIDER AND APPROVE AMENDMENTS TO THE HOMESARCH ALLOCATIONS POLICY.
MEETING:	INDIVIDUAL CABINET MEMBER DECISION
DATE:	11th NOVEMBER 2020
DIVISION/WARDS AFFECTED:	ALL

1. PURPOSE:

- 1.1 To consider proposed amendments to the Homesearch Allocations policy following a review of the current policy and processes.

2. RECOMMENDATIONS:

- 2.1 To consider the proposed changes (**see Appendix 1**) giving regard to meeting the aims of the policy and contributing to the priorities of the Council.

- 2.2 Where applicable, consider the report in respect of the recent changes in Welsh Government homeless policy and homeless demand.

- 2.2 To recommend that the Cabinet Member adopts the proposed changes.

3. KEY ISSUES:

- 3.1 Under the Housing Act 1996 and Housing (Wales) Act 2014, the Council has a legal duty to run a housing register that manages the letting of social housing in Monmouthshire. Monmouthshire Housing Association (MHA) administers the register on behalf of the Council via Homesearch. There is a service level agreement in place with MHA to manage this service. Melin Homes and Pobl are also part of the Homesearch partnership. Each housing association let their affordable housing in line with the policy and associated procedures. To ensure an effective allocation policy that continues to meet the needs and priorities of Monmouthshire, reflects current legislation and case law, periodic reviews are undertaken as per the requirements of the Housing Act 1996. The previous review was 2016.

- 3.2 In addition to ensuring the policy continues to meet the Council's aims, the review considered feedback from consultation events with stakeholders such as staff, support providers and Social Care colleagues as well as applicants and those recently housed via Homesearch. The comments received were collated, placed into themes and used as starting point when considering the effectiveness of the current policy. The review panel also reflected upon best practice and have set out amendments that support the Council's aim of an allocations policy, which is flexible, fit for purpose and meets statutory obligations and operational requirements.

- 3.3 The main policy changes include:

- Local Connection. The criteria has been tightened and applicants must have resided in Monmouthshire for a minimum of 2 out of the past 3 years. This is to ensure that established residents of Monmouthshire are given more priority to meet their housing need.

- Banding. The number of bands has reduced from 7 to 5. This is to help simplify the process and help ease of understanding for applicants.
- Armed Forces Personnel/Veterans. Applicants are to be given high priority when they are leaving the armed forces and do not have accommodation on discharge. This is in response to the Council's commitment to the Armed Forces Covenant.
- Lettings Quotas. This is being amended to include the introduction of flexible quotas which will allow the Homesearch Partnership to increase or decrease the number of properties available to each band. This will allow flexibility in the policy to respond to pressures and urgent need. e.g. increase the Homeless quota to meet statutory requirements.
- Rapid Rehousing Protocol. This is a requirement of Welsh Government's Phase 2 Planning Guidance for Homelessness & Housing Related Support and is an agreement between the Council and partner RSLs to minimise the time a homeless person spends in temporary accommodation before a move into permanent housing. This includes partnership working to identify suitable properties and the Council supporting move on into permanent housing with immediate intensive resettlement housing support. This will support the Housing Options Team in relation to their statutory obligations to ensure all homeless applicants have a move on plan and are supported in the transition to permanent housing and ending their homelessness.

3.4

In addition to the main policy changes detailed in **3.3**, the review also aimed to achieve business and organisation efficiencies together with improving the service user experience. These include:

- An upgrade of the Homesearch website, which is out-dated. No upgrades have been made since the current software and website were acquired over 10 years ago. Its functionality is minimal with little scope to make changes without paying a fee. One impact is a restriction on the ability to communicate with applicants.
- Customers and stakeholders have advised that the form is too long and time consuming to complete. It currently can take up to an hour to complete and it is known this impacts on more vulnerable applicants. The change also supports agencies who assist vulnerable applicants to apply for accommodation.
- Replacing paper based systems to a digital format e.g. medical/welfare. New facilities such as the ability to upload documents improves efficiency for staff and accessibility and convenience for service users
- Moving to a format that is mobile friendly. It is extremely difficult to use a mobile phone to make an application.
- The introduction of Auto-banding reduces the need for manual assessments. This will help to free Homesearch staff up from 'processing applications' to proactively engage with applicants.
- A new form to make it easier to apply for all tenures available through Homesearch, helping to increase housing options for applicants. The current form does not allow people to effectively register for intermediate accommodation. Nor is it easy to apply for low cost home-ownership properties.

- Enabling applicants to self-serve e.g. password re-set. This will reduce the need for applicants to contact staff, for example if they lose their details.
- Applicants have advised that they want to be kept informed on the progress of their application and have confirmation when documents are received. The new system will automatically send texts to applicants at each key customer contact point.
- The availability of Live Chat as an additional means of communication
- Improve transparency. Complaints from applicants aren't uncommon about perceived underhanded allocations. The new system will restrict the properties that customers see e.g. a person under 60 will not be able to bid on a sheltered property. This will alleviate the perception that the system is unfair and that applicants aren't cherry picked

4. **EQUALITY AND FUTURE GENERATIONS EVALUATION (INCLUDES SOCIAL JUSTICE, SAFEGUARDING AND CORPORATE PARENTING):**

4.1 There are no negative implications of the proposal. **See Appendix 2**

5. **OPTIONS APPRAISAL**

5.1 The following options are available:

Option	Benefit	Risk	Comment
<p>Option 1: The <u>recommended option</u> is to agree to the proposed amendments and implementation of the revised policy.</p>	<p>An allocations policy that is up to date and reflects current legislation and case law including the recent Welsh Government change in homeless policy through Phase 2 Planning Guidance for Homelessness & Housing Related Support</p> <p>An allocations policy that is robust and ensures the Council's statutory duties are met and can withstand any legal challenge. Again, this includes the new homeless responsibilities required by Welsh Government.</p> <p>An allocations policy that is flexible and able to respond to any challenges the Council may be facing.</p> <p>An allocations policy that supports Monmouthshire residents, particularly</p>	<p>There are no risks to this proposal, although there are financial implications</p>	<p>The review has been thorough and has included all aspects of Homesearch such as the application process, how we communicate with customers, eligibility/housing need, managing expectations and demotions/exclusions. The proposed amendments have considered all feedback received and officer experience and where appropriate led to amendments.</p> <p>There is a need for aspects of the revised policy eg Rapid Re-housing to be complemented by the future commissioning of the Housing Support Grant Programme, scheduled for April 2022.</p> <p>By way of example, the Council has recently received a legal challenge in respect of</p>

Option	Benefit	Risk	Comment
	<p>those in greatest housing need.</p> <p>Digital improvements provide costs benefits and keep operational costs to a minimum, which will benefit all Homesearch partners.</p>		<p>one aspect the Policy where an applicant considers that the Council may not be meeting its Equalities duties to all those with Protected Characteristics.</p>
<p>Option 2: Do nothing and rely on the existing policy.</p>	<p>The current policy is established and has been in place for the last 4 years.</p> <p>Staff, partners and customers have an understanding of the current policy. There would be no need for additional training or communicating changes with new applicants.</p>	<p>The current policy does not take into good practice that has been identified in the last 4 years.</p> <p>There is a risk that there could be gaps in the current policy or it is not as flexible as the Council would like to meet current challenges. Therefore, would not fully meet local need.</p> <p>The current policy doesn't reflect changes to Welsh Government homeless policy.</p> <p>This review has been undertaken in Partnership with Monmouthshire Housing, Pobl and Melin Homes. Should the Council not support the review this may impact detrimentally on this strategic partnership.</p>	<p>The council has a legal responsibility to review the allocations policy periodically and the review has identified areas where the policy would benefit from amendments.</p>
<p>Option 3: Implement some of the proposed changes.</p>	<p>This would see improvements in some aspects of the allocations policy.</p>	<p>This could leave gaps in the policy and leave the Council open to legal challenge if the policy doesn't properly reflect the current legal position.</p>	<p>The Council has a legal responsibility to review the allocations policy periodically and the review has identified areas where the policy would benefit from amendments.</p>

6. REASONS:

6.1 The Council has a duty to periodically review the Allocations Policy under the Housing Act 1996 and Housing (Wales) Act 2014.

6.2 Although this review was started during 2019, timing has allowed the requirements of Welsh Governments Phase 2 Planning Guidance for Homelessness & Housing Related Support to be incorporated into the changes. The proposed changes result in a better policy and system that strengthen delivery against the Council's objectives and better meets the needs of our customers.

7 RESOURCE IMPLICATIONS:

7.1 There will be resource implications associated with this proposal. These are:

£47,703 per annum This is the Council's annual contribution towards the Homeseach partnership which is shared with individual partners. This is budgeted from the Housing and Communities budget.

£15,000 one off fee This is the Council's contribution to upgrade the Locata IT system to implement the proposed changes. IT upgrades will include on line forms such as medical questionnaires and change of circumstances form, auto bid for low need applications, upgraded letters/templates, enhancements to Intermediate Housing side of Locata, better quality property adverts, push notification for applicants where suitable properties are available.

7.2 £2000 one off fee This is for Welsh Language compliance plus £2,500 annual fee

7.3 Due to the Covid-19 circumstances and the impact on the Council's homeless budget, there is currently no budget provision. (The review has been in progress since 2019). However, efforts will be made to absorb the expenditure into the Housing budget. If we cannot fund the costs within the service budget then as they relate to service transformation and collaboration, permission will be requested to capitalise the expenditure under the capitalisation directive.

8. CONSULTEES:

8.1 Head of Placemaking, Housing, Highways & Flooding; Chief Officer Enterprise; Housing & Communities Manager; Welsh Language & Equalities Officer; Disability Advice Project; U3A; Disability Wales; Stonewall Cymru; Race Equality First; Onyx Foundation, Melin Homes, Monmouthshire housing Association and Pobl.

8.2 The review considered feedback from consultation events with stakeholders such as staff, support providers and Social Care colleagues as well as applicants and those recently housed via Homeseach.

8.3 The proposal was considered by Adult Select Committee on 20th October 2020 and feedback was received. Comments and queries raised are listed in **Appendix 3.**

10. BACKGROUND PAPERS:

- Housing Act 1996

- Housing(Wales) Act 2014
- Welsh Government's Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness
- The Allocation of Housing and Homelessness (Eligibility)(Wales) Regulations
- Crime and Disorder Act 1998
- Equalities Act 2010
- Data Protection Act 2018
- Welsh Government Phase 2 Planning Guidance for Homelessness & Housing Related Support

11. **AUTHOR:** Louise Corbett, Strategy & Policy Officer – Affordable Housing

12. **CONTACT DETAILS:** Louise Corbett **Tel:** 09790 957039 **E-mail:**
louise.corbett@monmouthshire.gov.uk

Appendix 3

Adults Select 20th October 2020 - Consultation Feedback & Queries

Local Connection – Those in Prison

- Local Connection was queried and how the criteria applies to those incarcerated in Monmouthshire and those incarcerated outside of Monmouthshire.

It was confirmed that being placed in prison in Monmouthshire does not meet the local connection criteria and for Monmouthshire residents who may be placed in prison outside of Monmouthshire, Homesearch would consider their address history prior to detention. It is important to note that any applicants without a local connection are able to register on Homesearch but they will not be considered if they qualify for a reasonable preference for housing (unless in exceptional circumstances).

Improving Digital Access & Upgrading the Locata IT system to better support staff and service users.

- Concerns were raised that not all applicants are comfortable using the internet or mobile applications and how this change may affect them.

Although it is proposed to invest in this area there will be no deterioration in the way the service is offered to residents who may not want to utilise the digital service. The Hubs, Housing Options Team and Homesearch Team will continue to be available to support residents in accessing Homesearch and supporting them in relation to their housing concerns. The services of Housing Support Providers is also relevant in this regard.

Assessing Income, Savings & Assets

- The comment was made that in respect of sufficient financial resources and the fairness of using an arbitrary figure when looking at income, savings or assets and determining who may qualify for a reasonable preference for housing.

There is no official guidance as to what could be considered as sufficient financial resources. During the course of the Homesearch review many options were considered and the most appropriate and fair way of determining these figures was to consider open market conditions. We considered a Monmouthshire average entry level property price, the average cost of a private rented property and considered the income level required to access these properties. The policy amendments allow for an applicant who has medical requirements to be considered for reasonable preference irrespective of their financial circumstances. Anyone exceeding the sufficient financial resources threshold are able to register on Homesearch but will not be considered to have a housing need.

An Individual Housing Applicant & Their Current Circumstances

- A member of the Committee commented about the circumstances of an individual applicant whose banding was being affected by their circumstances and the policy.

It was acknowledged that a policy issue had been identified and was being addressed through the policy review. This was, in part, the purpose of the policy review. The applicant in question had been previously contacted and was aware of the situation and their application would be reviewed once the policy had been adopted. The Disability Advice Project who is supporting the applicant had also been made aware of the situation.