



Public report
Cabinet Report

Cabinet

18 February 2020

Name of Cabinet Member:

Cabinet Member for Housing and Communities – Councillor T Khan

Director Approving Submission of the report:

Deputy Chief Executive (People)

Ward(s) affected:

All

Title:

Coventry Homefinder Review (Social Housing Allocations Policy)

Is this a key decision?

Yes - the proposals are likely to have a significant impact on residents or businesses in two or more electoral wards in the City.

Executive Summary:

This report describes the Council's review of the social housing Allocations Policy and recommends changes to enable the city to best meet housing need within a backdrop of reduced turnover of Registered Provider (RP) stock. Coventry Homefinder is the Choice Based Letting system by which the majority of social housing in Coventry is allocated.

The Council committed to reviewing the Policy within the City's Housing and Homelessness Strategy 2019-2024. The revised Housing Allocations Policy is a key tool to support the delivery of the Housing and Homelessness Strategy. The last review of the Coventry Homefinder Policy was undertaken in 2014, with minor amendments in 2018 as a result of the Homelessness Reduction Act 2017.

The Council no longer owns any housing following the Large-Scale Voluntary Transfer of all the former Council housing to Whitefriars Housing Group (now Citizen) in September 2000. However, the Local Authority is legally required to have a scheme that allocates social housing. The aim is that those with the greatest need for housing are prioritised.

This report provides the context and evidence as to why the Allocations Policy needs to be reviewed, looking at how the turnover of social housing has reduced within a backdrop of increasing demand for affordable housing in the City.

The fundamental review undertaken (June 2019 to October 2019) has resulted in a new allocations scheme being developed and consulted upon. The key changes include:

- Changing how people apply for housing.

- Changing who can apply for housing (qualification criteria).
- Changing the Banding System (reasonable preference criteria) including the introduction of a reduced preference band.
- Reducing the number of refused offers allowed under the Policy.
- Changing how adapted properties are advertised and allocated.

A statutory and public consultation survey on the above proposals took place between 11th November 2019 and 3rd January 2020.

Recommendations:

The Cabinet is requested to:

- 1) Note that Communities and Neighbourhoods Scrutiny Board (4) noted, welcomed and were supportive of the proposed changes to the Coventry Homefinder Policy and the consultation being undertaken.
- 2) Consider the equality and consultation analysis and consultation responses received regarding proposals to change the Coventry Homefinder Policy (Housing Allocations Policy) and the summary report provided at Appendices B and C to the report.
- 3) Approve a revised Coventry Homefinder Policy, attached as Appendix A to the report, with effect from Autumn 2020.

List of Appendices included:

Appendix A – Draft Coventry Homefinder Policy 2020

Appendix B – Consultation Statement

Appendix C – Equality and Consultation Analysis - ECA (parts 1 and 2)

Appendix D – Current and proposed banding system

Background papers:

None

Other useful documents:

- Housing Act 1996 - <http://www.legislation.gov.uk/ukpga/1996/52/contents>
- Statutory Guidance - Allocation of accommodation: guidance for local housing authorities in England (2012)
<https://www.gov.uk/government/publications/allocation-of-accommodation-guidance-for-local-housing-authorities-in-england>
- Statutory Guidance - Homelessness code of guidance for local authorities
<https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities>
- [Coventry Homefinder Choice Based Lettings Policy 2014](#)
- [Implementation of the Homelessness Reduction Act 2017](#) (Coventry Homefinder Policy 2018 – Appendix C)
- [Coventry's Housing and Homelessness Strategy 2019-2024](#)

Has it been or will it be considered by Scrutiny?

No – however, an item on this matter was considered by the Communities and Neighbourhoods Scrutiny Board (4) on 14th November 2019.

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No – however, a presentation on this matter was considered by Disability Equality Action Partnership (DEAP) on 7th November 2019.

Will this report go to Council?

No

Report title:
Coventry Homefinder Review (Social Housing Allocations Policy)

1. Context (or background)

- 1.1 Coventry's current Housing Allocations Policy (Coventry Homefinder Policy) was introduced in 2014. There were minor amendments made in 2018 due to the Homelessness Reduction Act 2017, but the Policy has fundamentally remained the same for the last 6 years.
- 1.2 The Council no longer owns any housing following the Large Scale Voluntary Transfer of the former Council housing to Citizen (formerly Whitefriars Housing Group) in September 2000. The Local Authority is still required to have an allocation scheme for determining how allocations are made in order that those who have the greatest need for housing are prioritised. Coventry Homefinder is therefore a partnership between Coventry City Council and Registered Providers of social housing (mostly Housing Associations).
- 1.3 Coventry Homefinder is a Choice Based Lettings Allocation Scheme. People who want to move into a social rented home in Coventry can register with Coventry Homefinder. A banding system is used to give priority to those people with an urgent housing need (e.g. those people who are homeless, are overcrowded or who have a medical or welfare need to move) over those people who have no identified housing need and/or are currently adequately housed.
- 1.4 Available social housing properties are advertised each week and applicants can express an interest in (bid on) properties that they want to be considered for. At the end of each advertising period, a shortlist is created of all the applicants that have bid on the property, based on their band and their registration/effective date.
- 1.5 On 9th January 2020, there were 13,706 applicants registered on Coventry Homefinder. Of these 3130 applicants had been assessed as having a housing need and placed in the priority bands 1A to 2C (22.8% of the register).
- 1.6 Being registered on Coventry Homefinder does not guarantee that the applicant will be housed. In 2018/19 only 1400 properties were advertised on Coventry Homefinder, of which 13% were aged restricted properties. Only 196 properties (14% of lettings) in 2018/19 were for family sized homes (3 and 4 bedroom properties).
- 1.7 The Coventry housing landscape has changed significantly since 2014. There has been a substantial rise in homelessness and a significant increase in the number of households living in temporary accommodation.
- 1.8 The turnover of social rented properties available to let has reduced whilst demand for social housing has increased. This table shows the increase in demand and the reduction in lettings over the last 6 years:

Year	Total number on Register (snapshot)	Total in Reasonable Preference (snapshot)	Number of Lettings (over the year)
2013/14	14,272	1817	2211
2014/15	13,773	1616	2254
2015/16	13,794	1628	1768
2016/17	14,223	1927	1637

2017/18	13,487	1964	1551
2018/19	13,658	3049	1446

- 1.9 This report describes the process of consultation with Registered Providers to develop a range of proposals for change and how the proposals were consulted upon with both voluntary sector organisations and the wider public.
- 1.10 The review of the Coventry Homefinder Policy began in June 2019. In total five workshops were held with Registered Providers, one was held after the end of the consultation period. Six of the 10 Registered Providers who allocate housing via Coventry Homefinder attended at least one workshop. The Registered Providers who attended workshops collectively let 98% of properties advertised on Coventry Homefinder in 2018/19. The first four workshops enabled the Council to jointly develop a set of proposals for change.
- 1.11 Members of the public were invited to give their feedback on the current policy via the Council's new engagement platform called 'Let's Talk Coventry' in order to inform the review as it progressed. Prior to the launch of the consultation survey, the site received 699 visits with 63 participants either answering a quick poll or asked a question on the question and answer tool. Voluntary sector agencies who are members of the City's Homelessness Forum and/or the Frontline Network gave feedback on emerging definitions which would underpin a revised policy.
- 1.12 An 8-week public consultation survey was launched between 11th November 2019 and 3rd January 2020 with the aim of outlining the proposals for change to a wider audience. The survey also provided all Registered Providers with the opportunity to provide their statutory response to the consultation, as set out in the Housing Act 1996.
- 1.13 This report details the outcome of this consultation.

1.14 Emerging messages from consultation activities

- 1.14.1 There are a number of emerging themes from the consultation activities that are not specific to individual proposals but provide details of how the wider public, voluntary sector organisations and Registered Providers view housing as a key issue facing people who live in Coventry. These are outlined below:
- Support for undertaking the review of the policy in order to prioritise people in greatest need for housing and to make the allocations scheme simpler and more transparent.
 - Registered Providers were keen for a review to be undertaken and to ensure it could enable them to let available properties as quickly as possible.
 - More affordable housing options are needed in the City. Respondents to the survey highlighted their difficulties in accessing accommodation in the Private Rented Sector, particularly those on benefits or low incomes. Long term affordability of renting in the Private Rented Sector is given as a key reason for registering on Coventry Homefinder.
 - The belief that local people with the strongest local connection to Coventry should be prioritised for social housing.

- The need to improve the information available about individual properties on the Coventry Homefinder Website to support applicants to make informed choices about meeting their housing needs – this was specifically linked to feedback on the proposed reduced preference band and the proposed reduction in the number of refused offers.
- Many respondents to the consultation survey gave examples of their personal circumstances in relation to their current housing situation and/or their health and wellbeing difficulties and how their housing need impacted their health.

2. Options considered and recommended proposal

- 2.1 **Option 1 – No nothing.** This is not the recommended option. This would involve the Council and our Registered Providers retaining the current Coventry Homefinder Policy.
- 2.2 The current policy is no longer considered fit for purpose in the context of continued demand for social housing against a back drop of rising numbers of applicants to the register with a priority need for housing; coupled with a reduction in the numbers of properties advertised and allocated via Coventry Homefinder. The Council committed to review the Housing Allocations Policy within the City's Housing and Homelessness Strategy 2019-2024.
- 2.3 **Option 2 – Implement the pre-consultation proposals.** This is not the recommended option. This option involves implementing the original proposals outlined in this report. This would not take account of the feedback received from the wider public, Registered Providers and voluntary sector to recent consultation survey.
- 2.4 **Option 3 – Request further amendments to the current draft of the policy and/or further consultation.** This is not the recommended option. Over the last nine months the Council and our Registered Providers have completed a fundamental review of the current Policy, considering all aspects of possible change allowed within the current legislation. The general public and wider organisational responses from voluntary sector organisations have been generally supportive of the changes and a further period of review and/or consultation is unlikely to result in new proposals.
- 2.5 A further consultation period on new and/or revised proposals would delay the implementation of the Policy which is already subject to a lengthy implementation period due to the level of potential reassessments (c12,000) of current Homefinder applicants to determine whether they still qualify for the register and the level of their housing need to determine their new banding if the proposed changes were approved. In addition, the Housing and Homelessness Service is currently in the process of procuring a new IT system for the service which includes a housing allocations module. This could also mean all applicants will be required to re-register for housing.
- 2.6 There would be scope to make minor technical amendments to the wording of the draft policy to provide additional clarity that do not change the key aspects of the Allocations Scheme consulted upon. The revised policy may require some technical amendment (how you register for housing, keep your housing application up to date, how you bid for properties and how you are notified of the outcome of those bids) following the outcome of the IT tender.
- 2.7 **Option 4 – is to approve the post consultation proposals for change to the Coventry Homefinder Policy and approve a revised Coventry Homefinder Policy.** This is the recommended proposal. The revised proposals for change as detailed in section 3.7 of this report and the draft policy in appendix A takes account of the recent consultation feedback.

- 2.8 The consultation analysis for each individual proposal is contained within Consultation Statement – Appendix B along with the Equality Consultation Analysis in appendix C. Cabinet is required to read all of this material when making their decision. The summaries below do not provide a comprehensive treatment of all of the issues raised during the consultation but highlight those considered to be most significant.
- 2.9 Consideration has been given to the consultation feedback and equality analysis to inform a view on whether the existing proposals should proceed as originally described, be varied in light of consultation feedback and impacts or withdrawn. The following sections summarise this for each proposal with full information included in the appendices.

2.10 Proposals for change – Definitions

- 2.10.1 As part of the development of a revised Coventry Homefinder Policy three definitions were developed to underpin the principles of new policy and/or to support the administration of the new policy. These definitions were **adequately housed (no identified housing need)**, **low housing need** and **tenancy readiness**.
- 2.10.2 A key change to the current policy is that it is recommended to introduce a qualification criterion that to join the register, households must have an identified housing need. Under the current policy it is not a requirement to have an identified housing need. The definition of adequately housed supports the identification of housing need.
- 2.10.3 The definition consulted upon was ‘adequately housed’ which is defined as: *Applicants who are already housed in accommodation that meets their needs, both in terms of size, property type, property condition, location and affordability.*
- 2.10.4 The Council and Registered Providers wanted to ensure that, as part of the policy review, there was a wide ranging definition of housing need to ensure that those people with less urgent or emerging housing needs were still able to register for social housing. Therefore, a low housing need definition was developed to provide some of the reasons for which an applicant could be assessed as having a low housing need.
- 2.10.5 The low housing need definition consulted upon was as follows:
- Newly forming households – applicants living with friends or family wanting their own accommodation.
 - Newly forming households – applicants currently living apart who want to live together.
 - Applicants who are or could potentially experience financial difficulty if they remained in their current accommodation and therefore need to move to more affordable accommodation in the medium to long term.
- 2.10.6 The third and final definition was to define tenancy readiness. All social housing tenants are required to demonstrate to a Registered Provider they are able to maintain a tenancy. The definition of tenancy readiness underpins the revised policy as it supports the application and administration of the proposed new banding system (further details in paragraph 2.15 of this report). In policy terms the definition of tenancy readiness would only apply to Coventry Care Leavers and people currently living in supported accommodation (e.g. hostels or refuges).

2.10.7 As part of their feedback on the current policy Registered Providers raised concerns that some care leavers and some people living in supported accommodation were receiving offers of housing before they were ready which had led to examples of potentially avoidable tenancy breakdown.

2.10.8 The tenancy readiness definition consulted upon was as follows.

The applicant:

- Understands their responsibilities as a tenant to adhere to their tenancy agreement.
- Has the financial resources to pay the rent and other household bills.
- Is able to access and engage with formal (professional support) or informal support (family or friends) where this is required

2.11 Proposals for change - how people apply for housing

2.11.1 Under the proposals consulted upon, there were four proposed changes to how people apply for housing. These were:

- To have one application process with one form.
- For applicants to only have one live housing application.
- Changing the bidding cycle to enable properties to be advertised on any day. Applicants would have seven calendar days to place bids. The applicant bidding cycle would run Monday to Sunday.
- Reducing the time that applicants have to renew their housing application to 28 days.

2.11.2 The first proposal was to replace the current two-stage application process, whereby applicants complete one form to apply for housing and a second form to apply for priority banding (current bands 1A to 2C), with one form which assesses housing need at point of application.

2.11.3 Under the current policy, applicants can be registered on multiple applications. Under the proposals consulted upon this would no longer be allowed due to the need to assess the housing need of each household as part of the proposed qualification criteria. Further details of proposed changes to the qualification criteria are located in paragraph 2.12 of this report.

2.11.4 As part of the consultation with Registered Providers they requested the ability to advertise their properties more quickly via any day advertising. Under the current policy there is a static bidding cycle from midnight (00.00am) on Thursday morning to 11.59pm on the following Tuesday night, each week.

2.11.5 All households registered on Coventry Homefinder are required to complete an annual review of their housing application. They currently have 125 days to complete it. The proposal consulted upon was to change this to 28 days.

2.12 Proposals for change – who can apply for housing (qualification criteria)

2.12.1 Housing Authorities (Local Authorities) can specify local qualification rules. Applicants cannot join the housing register if they do not meet the qualification rules. The proposed changes to the qualification rules are:

- To change the qualification criteria so that only households with an assessed housing need and local connection to Coventry can apply. This means if a household is ‘adequately housed’ they will no longer be able to register on Coventry Homefinder.
- To continue to allow applications from people with a housing need but no local connection to Coventry but only in exceptional circumstances.
- To reject applications from households with no housing need and no local connection to Coventry.
- To add an asset/income cap to the qualification criteria.

2.12.2 Under the current policy anyone with or without a housing need can register for housing. Applicants with no identified housing need are currently placed in band 3A or 3B depending on their local connection to Coventry.

2.12.3 Applicants with no local connection to Coventry are able to register for housing. Those with a housing need but no local connection are currently placed in band 3A with applicants with a local connection to Coventry but no identified housing need. Applicants with no local connection and no housing need are currently placed in the lowest band which is 3B.

2.12.4 The current policy does not have any criterion relating to income or assets. In the proposed policy the income and/or asset cap was set at £50,000 for either income per year or other assets.

2.12.5 Changing the qualification criteria will result in all current applicants having to re-apply to the register. A significant number of these households will require an assessment of their current housing circumstances, approximately 12,000 households. Applicants with no current housing need will need to be re-assessed to determine whether they qualify under the new criteria and some applicants with an identified housing need will need to be re-assessed to determine a new banding, as a result of proposals to change the banding system. An applicant who is assessed as not meeting the revised qualification criteria will have a right to request a review of the decision made.

2.13 Proposals for change – reducing the number of refused offers of housing

2.13.1 The current policy allows applicants to refuse up to five offers of housing before their application is suspended. The proposal consulted upon was to reduce the number of refused offers allowed to three.

2.13.2 When an applicant refuses an offer of accommodation it increases the time that social rented homes are left vacant and delays another household being allocated the home at a time when social housing is in great demand. Registered Providers also incur costs when homes are left vacant.

2.13.3 Under the current policy applicants are notified that their application is suspended and are given 28 days to demonstrate the refusals of housing were reasonable in order for their application to be re-opened. Under the proposals consulted upon, refusing the maximum offers of suitable housing is a reason that an applicant could be placed in the proposed reduced preference band, as explained in paragraph 2.16 of this report.

2.14 Proposals for change – adapted properties

- 2.14.1 Adapted properties are currently allocated via a separate list and not advertised on the Coventry Homefinder Website. When an adapted property becomes available the Registered Providers work through the adapted property list to find a suitable tenant. The adapted property list is rarely updated, and this means it is becoming increasingly difficult to match applicants requiring adapted properties. This has resulted, on some occasions, in Registered Providers removing adaptions in order to let the property as general needs housing.
- 2.14.2 The proposal consulted upon, was to advertise and allocate adapted properties via the Coventry Homefinder Website, to enable applicants who require an adapted property to see which properties become available and express an interest in the property. An Occupational Therapist based within the Housing and Homelessness Service (a newly created post) will then work alongside the Registered Providers to ensure that each property is allocated by ‘best fit’ to the needs of the applicant. This may mean that offers made are not prioritised in order of priority band or effective date. In the event that two applicants bid for the priority with similar needs, the property will be allocated by priority band and/or effective date of applicants requiring adaptions in the first instance. If no bids are received from applicants who require adaptions, applicants who bid on the property but do not require adaptions will have the opportunity to view the property as general needs housing. The demand for adapted properties is high and it is expected that the majority; if not all adapted properties will be let to those requiring adaptions.
- 2.14.3 Applicants requiring adaptions can also continue to bid on general needs housing they believe could be adapted to meet their needs. The Occupational Therapist will support the applicant and the Registered Provider to decide if the property can be adapted and where required support them to source appropriate funding via adult social care (e.g. Disabled Facilities Grant).

2.15 Proposals for change – changing the banding system ('reasonable preference criteria')

- 2.15.1 The Housing Act 1996 provides the legislative guidance to whom Housing Authorities must give ‘reasonable preference’ under their Housing Allocation Schemes over other groups of applicants. Housing Authorities also have the flexibility to give ‘reasonable preference’ to other groups of people to support their local priorities.
- 2.15.2 The Housing Authority is also required to give ‘additional preference’ to applicants who are currently serving or have served within the Armed Forces.
- 2.15.3 The current banding system, adopted in 2014, has seven bands (1A, 1B, 2A, 2B, 2C, 3A and 3B). Bands 1A to 2C include those applicants to whom we must give reasonable preference.
- 2.15.4 The purpose of the banding system is to inform applicants how priority for housing is awarded. Feedback from applicants and voluntary sector organisations prior to and during the review, told us that the current banding system was too complicated and difficult to understand.
- 2.15.5 A key aspect of the review was to work with the Registered Providers to develop a revised banding system for consultation. Any revision to how priority for housing is awarded is a complex task with competing priorities. The key aim was to make any proposed banding system simpler and easier to understand to current and future

applicants whilst reflecting the current housing pressures and wider priorities for the City and meeting the legislative requirements.

2.15.6 The current and proposed banding systems are detailed in Appendix D. The proposed banding system consulted upon had five bands. This included bands 1 to 4 and a reduced preference band. The main changes include:

- Reducing the number of categories from 28 to 23, by combining some categories into the Urgent social and welfare category or removing some categories (such as removing priority due to reviews of applicants in higher bands and a joint category of urgent medical need and living in overcrowded conditions).
- The introduction of a low housing need band.
- The introduction of a reduced preference band. (This is explained in more detail in paragraph 2.16).
- The introduction of ‘tenancy readiness’ criteria for Coventry Care Leavers and those applicants currently living in supported accommodation.
- Separating the homelessness prevention and homeless relief priorities, giving increased priority to applicants owed a duty under the relief stage of the Homelessness Reduction Act 2017.
- Increased priority for Coventry Care Leavers who are tenancy ready.
- Increased priority for applicants who are approved fosterers or adopters who require more appropriate accommodation in order to foster or adopt.
- New criteria to support families who are being reunited following children being returned from the care of the Local Authority.
- Reducing the number of categories for housing need due to medical reasons from 3 to 2. The new categories include criteria relating to both physical and mental health and needs arising from social care needs.

2.15.7 Nearly all the current priority need categories that have been retained have been given equivalent priority in the new banding system. The exception to this is applicants who have priority for being overcrowded by 2+ bedrooms, who are currently placed in 1A but would move to proposed band 2 under the new banding system.

2.15.8 There is an increasing shortage of family homes (3 and 4 bedrooms) becoming available for social rent via Coventry Homefinder. Approximately 55% of the applicants who are overcrowded and requiring an additional 2+ bedrooms need either a 4, 5 or 6 bedroom property. These sized properties are in very short supply and once allocated to families they tend to remain in the property for long periods of time. In addition, the Local Authority is currently providing temporary accommodation to a number of large families at considerable cost to the Council.

2.16 Proposals for change – changing the banding system – the reduced preference band

2.16.1 During the development of the proposals for consultation. Registered Providers attending the workshops clearly indicated they felt a reduced preference band was required in any revised banding system. Under the current policy, shortlisted applicants can be ‘skipped’ by the Registered Providers for a variety of reasons. This means the shortlisting process for individual properties can be time consuming when their priority is to let their properties quickly.

2.16.2 The issue of ‘skipping’ is a long-standing issue that all parties agreed needed to be resolved. Prior to the inclusion of the reduced preference band in the proposed banding system, Council Officers reviewed current operational practice and skipping data to inform any future proposals. It was clear that many applicants were being skipped on multiple occasions due to unresolved issues (e.g. current or former rent arrears or

concerns relating to anti-social behaviour) and this was a barrier to them being offered a property at a late stage in the housing allocation process. Registered Providers currently have the responsibility to notify applicants they have been skipped.

2.16.3 Under the proposals consulted upon there are 4 reasons why an applicant could be placed in the reduced preference band. These are:

- Reduced priority status due to unacceptable behaviour or rent arrears.
- Households where main housing duty has ended due to refusal of accommodation.
- Households who have refused 3 offers of accommodation.
- Households in Bands 1 and 2 who have not actively bid for suitable accommodation.

2.16.4 The reduced preference band is designed to be a temporary banding. The final decision to place an applicant in reduced preference will be made by the Coventry Homefinder Team on review of information provided by either the Registered Provider(s) or the applicant themselves. Any applicant placed in the reduced preference band will be given clear information and advice as to the action required to return to their identified housing need band. Where required applicants would be signposted to local advice agencies. This new arrangement will be an improvement on current operational practice.

3. Results of consultation undertaken

3.1 The proposals consulted upon were developed in partnership with Registered Providers as outlined in section 1.9 and 1.10 of this report. A key element of the 8-week consultation survey undertaken between 11 November 2019 and 3 January 2020 was to provide the opportunity for wider feedback on the proposals and the revised Homefinder Policy from applicants currently registered on Coventry Homefinder, the general public and voluntary sector organisations.

3.2 In total 486 consultation responses were received, of which 77% (374 responses) indicated they were currently registered on Coventry Homefinder. Seven responses were an organisational response from a Registered Providers, one of whom doesn't let properties through Coventry Homefinder. 12 responses were received from voluntary sector agencies or other organisations. The consultation was undertaken through the following channels and methods:

- An automated message was issued via the Coventry Homefinder system to alert all applicants with an active application about the consultation – signposting them to the Let's Talk site. This message was read by 3,892 applicants
- Information about the consultation was published on both the Council website and on the front page of the Coventry Homefinder website. During the consultation period 3,892 people logged into their account.
- The Let's Talk Engagement platform attracted 2,800 visits to the Coventry Homefinder page during the consultation period. Using the platform allowed us to effectively engage with the public and provided a space where people could contribute their thoughts and ideas as well as provide specific feedback to each element of the proposed changes
- The consultation approach recognised that certain groups of applicants may not regularly log in to their account to see the automated message during the consultation period. These included people registered on the adapted properties list, people who the Homefinder team assist to bid and people who receive the weekly property list via post. This groups received a copy of the consultation information pack and paper survey with

a return envelope. In addition, where email addresses were held, applicants on Homefinder who had been accepted as homeless were contacted separately to advise them of the consultation survey.

- Information about the consultation was displayed in all Council run libraries and paper surveys were available with post boxes for the survey to be submitted.
- In total 31 paper survey responses were received and input into Let's talk.
- Engagement with the Coventry Homelessness Forum and Frontline Network
- Via Social Media (Facebook and Twitter)
- Internal communications to Council Staff

3.3 The key generic themes of the consultation process are outlined in section 1.13 of this report. Proposal specific feedback was generally positive from both the general public and Registered Providers and Voluntary Sector organisations. The strength of opinion for each proposal from the general public response is outlined below:

Proposal – General public opinion	Strongly Agree	Agree	Neither agree or disagree	Disagree	Strongly Disagree	Don't know
Qualification Criteria (449 responses)	17.4%	36.5%	12%	15.6%	15.6%	2.9%
Definitions (450 responses)	10.9%	38.4%	18%	13.6%	12.2%	6.9%
How you apply for housing (450 responses)	39.8%	43.3%	9.3%	2.9%	1.8%	2.9%
Bidding Cycle (446 responses)	29.8%	44.6%	13.5%	5.4%	5.2%	1.6%
Annual review process (450 responses)	24.2%	34.4%	18.2%	10.9%	8%	4.2%
Reduction in the number of refused (448 responses)	30.4%	36.6%	10.7%	10.7%	10%	1.6%
Adapted properties (451 responses)	36.1%	43.7%	11.5%	3.3%	1.1%	4.2%
Reduction in number of bands (448 responses)	17.2%	43.8%	17.2%	9.6%	7.8%	4.5%
Reduced Preference Band (447 responses)	19.9%	42.1%	18.6%	9.4%	6%	4%

- 3.4 The strongest areas of disagreement for the general public related to the proposed changes to the qualification criteria, specifically the proposed asset and income cap and the proposed definitions of 'adequately housed' and 'low housing need'. Full details of all the consultation responses are contained in the consultation statement in Appendix B.
- 3.5 The strength of opinion for each proposal from the Registered Providers and Voluntary Sector responses is outlined below:

Proposal – Registered Provider and Voluntary Sector Organisations*	Strongly Agree	Agree	Neither agree or disagree	Disagree	Strongly Disagree	Don't know
Qualification Criteria (19 responses)	10.5%	57.9%	15.8%	5.3%	10.5%	0%
Definitions (19 responses)	26.3%	47.4%	10.5%	10.5%	5.3%	0%
How you apply for housing (19 responses)	57.9%	31.6%	5.3%	0%	5.3%	0%
Bidding Cycle (19 responses)	47.4%	26.3%	10.5%	10.5%	5.3%	0%
Annual review process (19 responses)	26.3%	31.6%	5.3%	21.1%	15.8%	0%
Reduction in the number of refused (19 responses)	31.6%	36.8%	10.5%	10.5%	10.5%	0%
Adapted properties (19 responses)	63.2%	26.3%	5.3%	0%	5.3%	%
Reduction in number of bands (19 responses)	31.6%	52.6%	10.5%	5.3%	0%	0%
Reduced Preference Band (19 responses)	26.3%	47.4%	10.5%	15.8%	0%	0%

*Note a couple of responses in this group appear to be from individuals and not organisations.

- 3.6 For Registered Providers and voluntary sector organisations, the areas of highest disagreement were the annual review process and the reduction in the number of refused offers. Voluntary Sector agencies highlighted concern that the 28-day timeframe for the annual review process was too short for some vulnerable groups. This was echoed in some of the comments made by the general public. Some Registered Providers indicated they would prefer the number of refused offers to reduce further to either one or two. Full details of all the consultation responses are contained in the Consultation Statement in Appendix B.
- 3.7 Following analysis of the consultation responses, the table below summarises where proposals have been amended post consultation:

Proposal consulted upon	Change recommended to original proposal?	Outcome recommended post consultation
Definitions to underpin revised policy – Adequately Housed	No	Implementation recommended
Definitions to underpin revised policy – Low Housing Need	Yes	Implementation recommended with following changes: Terminology to be changed to 'housing need' with minor amendments/additions to the definition.
Definitions to underpin revised policy – Tenancy Readiness	No	Implementation recommended
Qualification Criteria (assessed housing need and local connection)	No	Implementation recommended
Qualification Criteria (assessed housing need and no local connection –in expectational circumstances)	No	Implementation recommended
Qualification Criteria (to cease accepting applications from households with no housing need and no local connection to Coventry)	No	Implementation recommended
Qualification Criteria - To add an asset/income cap	No	Implementation recommended
Changing how people apply for housing – To have one application process with one form.	No	Implementation recommended
Changing how people apply for housing – For people to only have one live housing application.	No	Implementation recommended
Changing how people apply for housing – Changing the bidding cycle	No	Implementation recommended
Changing how people apply for housing – Annual Review Process	Yes	Implementation recommended with the following changes: The time allowed to complete the annual review process will be extended from the 28 days consulted upon to 56 days.
To reduce the number of refused offers to three.	No	Implementation recommended
Adapted Properties	No	Implementation recommended
Changing the current banding system – From 7 to 5 bands	Yes	Implementation recommended with the following change – Band 4 will be renamed 'housing need' instead

		of 'low housing need' to reflect the change to the definition 'low housing need'
Changing the current banding system – Reduced Preference Band	No	Implementation recommended

4. Timetable for implementing this decision

- 4.1 Subject to Cabinet approval, the revised policy will be implemented from Autumn 2020. The implementation process is dependent on a revised IT platform which will support the administration of the policy. The Housing and Homelessness Service is currently procuring a new system. It is anticipated that the outcome of the tender process will be known during Spring 2020.
- 4.2 The changes to the qualification criteria necessitate that all applicants will need to re-apply and a comprehensive review of current housing applications will need to be undertaken to reassess against the revised qualification criteria and for those applicants who meet the criteria, to determine the applicant's priority band.
- 4.3 The level of re-assessment will be dependent on the information already held by the Housing and Homelessness Service about the applicants' current housing circumstances. In some cases, this may mean the applicant is automatically transferred to an equivalent band without requiring a full re-assessment (e.g. applicants with priority relating to a homelessness application).
- 4.4 Any current applicants who do not meet the revised criteria will be notified and will have the right to request a review.
- 4.5 The Council will endeavour to contact all current applicants electronically or by other appropriate methods (post) to notify them of the changes and of the requirement for them to re-apply. There will be a specified date by which current applicants will need to re-apply.
- 4.6 In the event that a current applicant does not reapply, they can still make a subsequent housing register application, but they will be given a new registration date unless exceptional circumstances exist. The impact of this will mean that some current applicants would lose any previous waiting time which is considered during the shortlisting process after priority banding.
- 4.7 The proposed implementation timeline is as follows:
 - March to June 2020 – IT changes preparation and designing application process and re-assessment process for current applicants
 - July to August 2020 – Testing IT system ahead of implementation (including user testing)
 - August - September 2020 – IT Implementation (Housing and Homelessness Service and Registered Provider)
 - September – November 2020 – Re-registration and assessment of applicants
 - November 2020 – Intention to 'Go live' with revised policy
- 4.8 A key aspect of the implementation will be to communicate the changes and required action to current Coventry Homefinder applicants from March 2020 onwards. This will be a key priority for the Coventry Homefinder Steering Group working alongside our voluntary sector partners.

5. Comments from Director of Finance and Corporate Services

5.1 Financial implications

The Council faces a significant financial pressure as a result of households in temporary accommodation. At Quarter 3 we are forecasting a £3.1m overspend for the service against a net budget of £9.6m. Although there are no direct savings built into the model for the financial impact of this, availability and allocation of permanent social housing is a key factor that can influence levels of temporary accommodation. Having an approved and clearly understood policy is therefore key to the future sustainability of the Housing and Homelessness service.

The direct financial implications relate to:

- the creation of a Housing Occupational Therapist post (para 2.14.2) at a cost of £46,500 per annum. This post will be funded from the Disabled Facilities Grant; and
- additional temporary staff to support the one-off reassessment of 12,000 households in line with the new policy criteria (para 2.12.5). This is at an estimated cost of £50,000 and will be funded from the Housing and Homelessness budget in 2020/21.

5.2 Legal implications

Under Part 6 of the Housing Act 1996 the Council, despite having no housing stock, is still required to have an allocation scheme which needs to include the Council's policy on offering those to be allocated housing a choice of housing accommodation or an opportunity to express preferences for accommodation. Further provisions exist regarding homelessness provision in the Homelessness Act 2002 and the Homelessness Reduction Act 2017.

In drafting the Homefinder policy, the statutory guidance "Allocation of Accommodation: Guidance for local housing authorities in England" June 2012 and the "Homelessness Code of Guidance for Local Authorities" February 2018 published by the Department for Communities and Local Government need to be taken into consideration.

When introducing a new allocations policy the Council must consult with all Private Registered Providers of social housing and registered social landlords with which they have nomination arrangements. As a housing allocations policy can have a significant impact on members of the public in an area, particularly those who are awaiting a housing allocation, it is also appropriate to consult with the public in general.

The Homefinder policy could impact on people with protected characteristics under the Equality Act 2010. Section 149 states that the Council must have regard to the Public Sector Equality Duty which is designed to eliminate discrimination, advance equality of opportunity and foster good relations between those people with a protected characteristic and those without.

6. Other implications

Any other specific implications

6.1 How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

The revised Coventry Homefinder Policy will contribute to meeting the priorities in the Corporate Plan, specifically;

- Locally Committed – protecting our most vulnerable people (including preventing homelessness and helping people who do become homeless).
- Locally Connected – Improve health and wellbeing
- Locally Connected – Reducing health inequalities.
- Globally Connected – reducing the impact of poverty

6.2 How is risk being managed?

The Policy has had regard to all relevant legislation and statutory guidance and has been developed following a robust consultation process. There is always the risk of challenge to a Council decision; however, this risk will be minimised by a policy meeting statutory requirements and applicants having the right to a review of certain decisions.

The Strategic oversight, implementation and co-ordination of this policy will be undertaken by the Coventry Homefinder Steering Group who will meet quarterly for the first year of policy and at least twice a year in subsequent years. The Homefinder Steering Group will include representatives from:

- Coventry City Council
- Citizen
- Midland Heart
- Orbit Heart of England
- Advice Services Coventry (Welfare Reform Working Together Group)

6.3 What is the impact on the organisation?

The revised Housing Allocations Policy supports the Council's organisational priorities including our corporate parenting role. Whilst access to the Housing Register does not guarantee applicants being housed, it is felt the revised application process, qualification criteria and banding system will provide those with the greatest housing need a greater chance of being housed thus reducing deprivation and health equalities.

Implementing the revised policy will require a short-term staffing increase within the Coventry Homefinder Team as outline in section 5.2.

6.4 Equality and Consultation Analysis (ECA)

A full Equality and Consultation Analysis (ECA) has been carried out. The full document (parts 1 and 2) is located in **Appendix C** to the report.

The equalities analysis pre and post consultation has clearly indicated both potential positive and negative equality implications of the proposed changes to Coventry Homefinder (Social Housing Allocations Scheme). The potential positive equality implications could apply across all protected characteristics, particularly in respect of the changes supporting those in greatest housing need to be offered a suitable property. Assessing housing need at point of application is also seen as a positive change for all applicants including those with protected characteristics.

The specific changes to the way adapted properties are advertised and allocated is considered to be a very positive change for older people and people with disabilities who require an adapted property. People with disabilities are particularly supportive of this change. The changes to the banding system are positive for young people who are leaving care but there is concern that younger people living with friends and family or in shared accommodation are less likely to be offered housing.

The changes to the banding system will potentially negatively affect people from BME backgrounds who are:

- a) currently living in overcrowded conditions or
- b) who are currently registered in band 3b (no housing need and no local connection to Coventry) who no longer be able to register under the proposed qualification criteria.

Mitigations identified for overcrowded households include the revised policy providing flexibility as to how properties with two living rooms could provide additional bedroom provision with the agreement of the registered provider. As part of the implementation process all current applicants will need to re-apply and as part of this process the housing need of the household will be assessed. This will give applicants the opportunity to have their housing need assessed as where exceptional circumstances are identified they will still be able to re-register (as long as they meet the other qualification criteria – applied to all applications).

As part of the implementation process equality impacts will be assessed. This will be supported by a new IT system currently being procured for the Housing and Homelessness Service which will improve the collection and analysis of equalities data. A review of the revised policy will be undertaken one year after implementation which will include a review of actual ECA impact.

6.5 Implications for (or impact on) climate change and the environment

There are no known implications or impacts on the environment from the proposals to amend the Housing Allocations Policy.

6.6 Implications for partner organisations?

As the Council no longer holds any housing following the stock transfer to Citizen (formerly Whitefriars Housing Association) in September 2000. Coventry Homefinder is therefore a partnership between Coventry City Council and Registered Providers (mostly Housing Associations) in the City.

Registered Providers have been actively engaged in the review of the Coventry Homefinder Policy. The revised policy supports their organisational objectives to let properties quickly and create balanced and sustainable communities.

Voluntary sector organisations have also contributed to the review and will have an important role in supporting some applicants through the implementation of the revised policy.

Nominated Registered Providers and a representative from the voluntary sector are members of the Coventry Homefinder Steering Group/Partnership who will have strategic oversight of the revised policy.

Report author(s):

Name and job title:

David Ashmore – Director of Housing and Transformation
Gemma Tate – Change Manager – Transformation

Directorate: People

Telephone and email contact:

David Ashmore – David.Ashmore@coventry.gov.uk Telephone 024 7678 7915
Gemma Tate – Gemma.Tate@coventry.gov.uk Telephone 024 7697 1383

Enquiries should be directed to the above person.

Contributor/approver name	Title	Directorate or organisation	Date doc sent out	Date response received or approved
Contributors:				
Jim Crawshaw	Head of Housing and Homelessness	People	15.01.20	21.01.20
Mandeep Chouhan	Operations Manager Housing and Homelessness	People	15.01.20	21.01.20
James Harrison	Programme Manager	People	15.01.20	21.01.20
Shelia Stirling	Service Manager – Occupational Therapy and Community Equipment	People	15.01.20	21.01.20
Michelle Salmon	Governance Services Officer	Place	15.01.20	16.01.20
Names of approvers for submission: (officers and members)				
Rachael Sugars	Finance Manager	Place	15.01.20	21.01.20
Gillian Carter	Solicitor, Team Leader (Regulatory), Legal Services	Place	15.01.20	20.01.20
Gail Quinton	Deputy Chief Executive	People	22.01.20	27.01.20
Councillor T Khan	Cabinet Member Housing and Communities	-	22.01.20	27.01.20

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