

## Detailed Consultation Responses

The following tables set out in full the area of policy commented on, the responses we received (as stated by the respondent) and our response / action as a result. This is split into 3 sections:

1. Specific Responses, Section by Section
2. Comments on Wider Sections / Aspects of the Policy
3. Other Comments about the Policy / Consultation

### Specific Responses, Section by Section

#### Section 5 - Eligibility and Qualification

##### Area of Policy Commented On

If an applicant is nominated to another local authority for re-housing, this counts as an allocation of housing.

In exceptional cases, with housing needs sitting outside the normal criteria, allocation of housing can be made by the Council outside other criteria

##### *Consultation Response*

*No, needs further explanation as to why it's been nominated to another authority*

##### Action/Response: No change proposed.

We think this comment refers to Section 5.1 "What is an Allocation", bullet point (b) which reads:

"Nominating a person to be a secure or introductory tenant of housing accommodation held by another housing authority".

This is a rarely used provision which enables the council to nominate an applicant for a property provided by another local authority where that person has a local connection or interest in a property **and** the other authority accepts that person or household to be rehoused.

Section 169 of the Housing Act 1996 requires us to give due regard to statutory guidance provided by the Secretary of State. Updated statutory guidance from October 2023 (at [Allocation of accommodation: guidance for local authorities - Chapter 1: Scope of guidance and definition of an allocation - Guidance - GOV.UK \(www.gov.uk\)](#)) paragraph 1.3 ("Definition of an 'allocation'") states that a housing authority allocates accommodation when it "nominates a person to be a secure or introductory tenant of accommodation held by another housing authority", the same wording as used in the proposed policy.

## Section 9 - Choice Based Letting (CBL) - Principles

<b>Area of Policy Commented On</b> (Not specified - Section 9)
<b>Consultation Response</b> <i>Yes, it is fair</i> <i>What is the current policy ? 1 or 2 years.</i> <i>Yes, debts need to be cleared or agreement to write off.</i>
<b>Action/Response: Thank you for these comments.</b> The current policy is a 12 month residential requirement which we propose to change to 2 years.

<b>Area of Policy Commented On</b> 9.2(a) Principles - existing tenants 9.3(c) Qualification for an allocation 9.7(e) CBL scheme principles
<b>Consultation Response</b> <i>9.2 (a) I don't understand what this means.</i> <i>9.3.(c) Depends on context. Is applicant seeking a council home to ease their financial situation - moving from private rental arrears to a council home would be a positive financial decision. Has there been previous contact with the Tenancy Sustainability Team?</i> <i>9.8(e) n/a</i>
<b>Action / Response: Thank you for these comments.</b> 9.2 (a) - existing tenants. Although we have to use technical terms here (to distinguish the tenancy types we are referring to), we will amend the text to aim to make it clearer. 9.3 (c) - current arrears. We note your comments and will amend this to include: "Where affordability or financial hardship is an element of the housing need of the applicant, this will be considered in assessing an applicant's qualification status."

## Section 10 - Eligibility

### Area of Policy Commented On

10.7 Applications from Employees. Employees, Councillors (and their close relatives) may apply for housing but this will be subject to an appropriate declaration of interest

### *Consultation Response*

*Should be treated like any other application*

### **Action/Response: Noted.**

Applications from employees, elected representatives and their close relatives are treated in the same manner as other applicants, other than the applicant being required to declare their connection to the Council.

We have amended the wording at 10.7 to make this clearer.

Any offers of accommodation (to an applicant with such a notification) are signed off by the Head of Service, to avoid any actual or perceived conflict of interest.

This is to ensure that the process is not only fair and transparent but can be seen to be so by the public and any other interested party.

## Section 11 - Qualification

**Area of Policy Commented On** *(Not Specified - Section 11)*

### **Consultation Response**

*I think the 2 year residency is fair given the demand on social housing as long as the relevant exceptions are place within section 11.1. This also puts the council in line with government guidance on a reasonable period. The changes to medical and social needs have made this area easier to understand.*

**Action/Response: Thank you for this feedback.**

**Area of Policy Commented On**

11.1(a) Qualification Criteria

With limited exceptions, housing applicants will not qualify for re-housing until they have lived in the district for at least 2 years prior to their application

### **Consultation Response**

*Can we have specific clarity that the 2-year period doesn't apply to Domestic Abuse victims, please. It seems that it doesn't apply - but just wanted to check.*

**Action/Response:**

**We can confirm that this would not apply to domestic abuse victims where they are accepted as being owed a homelessness duty by the Council.**

Applicants who state they must move home because of domestic abuse will always be referred to our housing options team for advice and support to consider making a homeless application (where they have not done so already).

**Area of Policy Commented On**

11.1 (a) (ii) & (iv) Residency

11.1.(e) Members of the armed forces

The qualifying criteria related to members of the armed forces is extended to their spouse or civil partner, as if they were the applicant

### **Consultation Response**

*11.1 (a) The 2 year qualification should not apply for vulnerable residents who need to be near their family/support network.*

*People can be made homeless for numerous reasons and applicants should be judged on a case by case basis.*

*11.1 (e) This isn't clearly explained.*

**Action / Response: Thank you for these comments.**

11.1 Residency - exceptions already apply to the applicants who meet 'reasonable preference' criteria as indicated at 11.1.(a)(iii) - this includes those who the Council accepts a homeless duty for, for example.

11.1.(e) Members of the Armed Forces - the opening line of (e) and bullet points (ii) and (iii) refer to how a spouse / civil partner is considered, but we have also added further reference at bullet point (iv)

**Area of Policy Commented On**

11.1.(d) (ii) Owner Occupiers

***Consultation Response***

*Needs to comply with any statutory agreements*

**Action/Response: We can confirm that all aspects of the policy are statutorily compliant.**

As part of the approval process the proposed policy has been checked by the Council's legal service to ensure such compliance.

We have clarified the meaning of 'owner occupier' for the purpose of the allocations policy within this section.

## Section 11.2 & 11.3 - Non Qualifying - Rent Arrears / Unacceptable Behaviour

### Area of Policy Commented On

Applicants with current or former rent arrears or where there is evidence of unacceptable behaviour in their current or former housing may be assessed by an exclusion panel and if appropriate, be deemed ineligible to be rehoused. Is this fair to applicants?

### Consultation Response

*11.2 Rent arrear restrictions - are Domestic Abuse victims excluded from this?*

**Action/Response: Yes** - Victims of domestic abuse (and other limited exceptions) apply. In addition, all cases will be considered on their own merits.

### Area of Policy Commented On (Not specified - Section 11)

### Consultation Response

*Yes, fair to applicants.*

**Action/Response: Noted.** Thank you for this comment.

### Area of Policy Commented On

Rent Arrears / Unacceptable Behaviour

### Consultation Response

*Re: arrears, see response to 9.3(c). Re: unacceptable behaviour, this is fair. Applicants/tenants should behave in an acceptable manner for the consideration of their neighbours and community.*

*However, by deeming such applicants as ineligible, it potentially exacerbates or relocates the problem.*

**Action/Response:** Please see comments at 9.3(c) above. 11.2.2 refers to how cases will be considered individually by the exclusion panel, enabling exceptions or individual circumstances to be considered.

## Section 12 - Reasonable and Additional Preference

### Area of Policy Commented On

12.1 (f) & (g), 12.2 (whole section) Medical and Welfare (Social) Needs

See Also Annex One below. We have significantly amended the wording and information provided to applicants who may have medical and/or welfare housing needs about how we will consider and apply (or not apply) increased priority banding as a result of medical or social needs assessments

### *Consultation Response*

*Regarding Domestic Abuse victims, can we have clarity between the distinctions of Band 1 and Band 1+ please. We would like to see all MARAC cases (the most serious of all Domestic Abuse cases) being given the highest possible banding.*

*12.2.7 - Severe welfare grounds. This only states firm recommendation from a Statutory Agency. We would request that this includes 3rd sector support agencies too. New Era, for example, holds the contract for pan-Staffordshire Domestic Abuse support and is a key member of MARAC.*

### **Action/Response:**

**We can not automatically apply an increased band to cases.** We will however consider each MARAC case within the social (welfare) needs assessment process and award Band 1+ status where this is appropriate.

**We accept your comments in relation to paragraph 12.2.7. and will amend the relevant bullet point to:** “Where there is a need to protect a vulnerable person and there is a firm recommendation for rehousing from a statutory agency or a recognised partner voluntary agency”. The existing policy wording following the bullet points further confirms this.

## Section 13 - Determining Priority Between Households

### Area of Policy Commented On

13.2 (d) Cumulative Need

### *Consultation Response*

*There is no explanation of what Cumulative Need is - it only states that it is no longer being used.*

### **Action / Response: Thank you.**

13.2 (d) There is no explanation of cumulative need here as we proposed its removal. Cumulative need is in essence 'totting up' the housing needs of an applicant. If an applicant (and household) have more than one, they jump up a band. We are proposing replacing this through the medical and welfare (social) needs assessment approach to ensure fairness and transparency, as these enable the whole situation to be determined on a more fair and equitable basis.

### Area of Policy Commented On

13.4 (whole section) Band One +

13.5 (a) (b) (c) (d) (h) & (i) Band One AND

13.5.1 Downsizing / Adapted Homes Band 1 (House/Bungalow)

### *Consultation Response*

*Yes, fair to applicants (13.4 and 13.5)*

**Action / Response: Noted.** Thank you for this comment.



## Section 14 - Assessment Criteria

### Area of Policy Commented On

14 (h) Rough Sleeper - somebody who does not sleep in a recognised residential dwelling and has not done so for prolonged periods of time and has no access to bathroom facilities, **will be placed into Band 1.** (i) Reduced preference - Although the allocations scheme seeks to ensure that those in greatest housing need are re-housed more quickly.

### Consultation Response

*My only question for this policy would be a to have a better understanding of what the below statement is suggesting. i.e. how long is a "prolonged" period of time? This is not something we as homeless outreach workers have been aware of.*

### Action / Response: Thank you for this feedback. We will amend the wording of 14 (h) to:

"Rough Sleeper - somebody who has no fixed address **and** whose normal pattern of sleeping is in the open air or in a place(s) or building(s) not designed for habitation, will be placed into Band 1". (A footnote will refer to the full accepted UK Government definition of a rough sleeper will be used in cases where there is any question on qualification under this category).

Please note also that any 'rough sleepers' who are owed a duty by the council under homeless legislation will be placed into band 1 under section 14 (g) of the policy ('Homeless Duty'). The allocations team will always refer anyone who states they are a rough sleeper when applying for accommodation to our housing options team for advice and support referral and to consider making a homeless application.

We will need to distinguish those whose who may experience 'rough sleeping' on limited occasion (e.g. sleeping out for a single night before moving into a residential setting) from those for whom that is their only option as normal practice.

### Area of Policy Commented On

14(i) (v - viii) Reduced Preference

### Consultation Response

*This is fair. However, (vii) re: housing related debts should be seen in the context of the financial distress and whether the applicant has sought help to improve their finances. Reduced preference could worsen social problems, e.g. gambling addiction, job loss, victim of crime, etc.*

### Action / Response: Thank you for your feedback.

14.(i) (v - viii) We will amend 14 (i) to explain that we will consider context and any reduced preference decision will be subject to right of review. (Please see also associated comments at 9.3 (c) above).

## Section 21 - Making an Allocation

### Area of Policy Commented On

21.8 Quarterly Review of Allocations Quotas

### *Consultation Response*

*This question is inappropriate. Anybody outside of the Councils Housing Department would not have the required data or knowledge of the system to make a reasonable assessment of the proposed quotas.*

### **Action / Response: Noted.**

**21.8 - Quarterly Review of Allocations Quotas** - we do not consider this was inappropriate, but apologise if what we asked was not explained sufficiently. The question was seeking responses in principle about whether a split of 70:30 (between the higher and lower bands) seemed fair and proportionate. While we appreciate that this would be difficult for some to consider, we did feel that a number of agencies we work with and some internal colleagues especially may have a view they would wish to express.

## Section 22 - Refusals

### Area of Policy Commented On

22.2 Re-banding of applicants who refuse reasonable offers of accommodation

Applicants who refuse reasonable offers of accommodation may be re-banded (be given lower preference) as a result of their refusal; in the case of 3 offers being refused their application may be placed in abeyance for 12 months.

### Consultation Response

*With regard to Domestic Abuse/MARAC cases, it has been known previously that victims have turned down properties and as a result they have been removed from the housing list.*

*In situations of Domestic Abuse declining a property or not providing appropriate documentation may be perceived as the victim not wishing to move or not being co-operative. In reality, however, it often due to an inappropriate proposed new location or being unable to provide proofs due to the risk of the perpetrator discovering their intentions.*

*Has this been considered?*

### Action / Response: No changes proposed.

We are not aware of this being the case or of the individual cases being brought to our attention. We would like to investigate any recent cases if we can be advised of these.

We will ensure that individual cases are considered on their own merit taking account of all the circumstances, including the particularly sensitive issues around domestic abuse. We encourage applicants to bid for as many properties as possible, but applicants are not required to bid for all properties and can restrict bids to areas of choice. Sanctions will only be applied where a refusal is unreasonable and are subject to the applicants right to review.

Where bids are made on an applicants behalf by the housing options team (as part of discharging a homelessness duty) the applicant can ask the housing options team to review the suitability of an offer where they consider it is not reasonable to accept it.

### Area of Policy Commented On

22.2 Re-banding of applicants who refuse reasonable offers of accommodation

Applicants who refuse reasonable offers of accommodation may be re-banded (be given lower preference) as a result of their refusal; in the case of 3 offers being refused their application may be placed in abeyance for 12 months.

***Consultation Response***

*So long as reasonable, joint consultation is evidenced*

**Action / Response: Noted.**

We confirm that each case of refusal will be treated on its merits taking account of the applicant's reasons for refusal. Where appropriate we will liaise with our housing options team (about a homeless applicant) or other agencies as part of the decision making process. All such decisions are also subject to an applicant's right to request a review.

## Comments on Wider Sections / Aspects of the Policy

### Sections on Veterans

#### **Consultation Response:**

*Please see suggestions below. I would tend to reframe the Policy so that it reflects greater clarity in the areas that particularly affect Housing Options & Homelessness Services. Currently all HM Forces personnel are stated as being in a Band 1 plus category. I'm sure this does not happen in practice, however the Policy states that they will be Banded as such.*

#### **Action/Response: Thank you for your comments - see also below**

Section 13.4 (c) refers to circumstances where current or former members of the armed forces will be awarded Priority Band 1+ . Please see comments below in relation to this.

#### **Consultation Response:**

*This Policy observes the UK Guidance on improving access to Social Housing for those who have served in HM Armed Forces, of which states that the Council must not disqualify members of the Armed Forces from applying for accommodation on residency grounds. This extends to applications from former service personnel, where the application is made within five years of discharge from HM Armed Forces. (this means that local connection rules will not apply for the five year period).*

*The Regulatory provisions recognise the special position of members of the Armed Forces Service Personnel and their families, whose employment requires them to be mobile and who are likely to be particularly disadvantaged by local connection requirements.*

*In order to qualify under the UK Armed Forces Regulations, British Armed Forces Personnel must fall under one of the following categories-:*

- a. A Former member of the Regular Armed Forces*
- b. A Serving member of the Regular Armed Forces and suffering from a serious injury, illness or disability which is wholly or partly attributable to your service.*
- c. Serving or former members of the Reserve Armed Forces and suffering from a serious injury, illness or disability which is wholly or partly attributable to their service.*
- d. Bereaved spouse or civil partner of those serving in the Regular Forces where (i) the bereaved spouse or civil partner has recently ceased, or will cease to be entitled to reside in Ministry of Defence accommodation following the death of their Service spouse or civil partner, and (ii) the death was wholly or partly attributable to their service.*

*Where applicants fall into any of the above categories, they should complete our online housing application form. Their application will be assessed based on their current housing need and a Band will be awarded.*

*(Suggest) In order to award members of the Armed Forces, including spouses / civil partners, additional preference, differentiated by the urgency of their housing*

*need, applicants will be awarded (suggest) a Band higher than they would normally be awarded based on their housing need. Alternatively you can consider a backdate of 6 – 12 months as method of additional preference.*

*NOTE:- In all cases, additional preference will be granted on the basis of an Honourable Discharge from HM Armed Forces.*

*NOTE:- Our Policy should make clear that applicants who have been Dishonourably Discharged from HM Armed Forces, will not receive any additional preference, instead their application will be assessed subject to their individual circumstances.*

**Action/Response: Accepted. We will amend:**

Section 5, 'Eligibility and Qualification', 5.12 'Additional Preference Must be Given to', (a) to: "(a) Former members of the Armed Forces, excluding those who have been dishonourably discharged from the service;"

**And**

Section 9, 'The Council's Choice Based Lettings Scheme - Principles', 9.2 'The Council May Decide...', (b) (i) to: "(b) (i) Serving and former Armed Forces applicants as set out in para 5.7 above, excluding those former members who have been dishonourably discharged from the service".

**And**

Within each of Bands 1 - 3 within Section 13 - "Determining Priority Between Households - Priority Bands", we will add an additional bullet to reference that additional preference for eligible serving or former members of the armed forces will be placed in a band higher than the band which relates to their housing need.

For example, 13.5, 'Band 1':

"(i) Serving or Former Members of the Armed Forces eligible for additional preference, whose housing needs are one of the types listed under Band Two, paragraph 13.6 (a) - (h)"

We will delete 13.6, (d) as this will no longer be relevant.

Band One+ categories relating to armed forces personnel will be amended slightly. 13.4(c) to read: "Members of the Armed and Reserve Forces, whose housing needs are one of the types listed under Band One and are eligible for additional preference. This will normally include:" with the first bullet point (i) amended to: "Former members of the Armed Forces whose housing needs fall into one of the additional preference categories listed in paragraph 12.1 above".

This will also ensure we reflect the change to exclude those dishonourably discharged.

## Strengthen Direct Offers

### **Consultation Response:**

*There may cases where the Council will need to make a direct offer on behalf of an applicant to a property where -:*

- the applicant has not made any bids for accommodation within two months.*
- Applicants who are homeless, in priority need with children and residing in temporary accommodation, where they have not successfully bid for accommodation within a reasonable but limited period of time (two months).*
- We require the ability to fulfil duties in line with the Homelessness Reduction Act 2017.*
- There are adverse financial impacts upon the Council by not making a direct offer.*

### **Action/Response: We will amend 22.1 and add 22.1.1 as follows:**

22.1 "There may be occasions where the Council will need to consider making one reasonable direct offer of a property to an applicant. This includes:

- Applicants who have not been actively bidding for a property over a two month period who have been accepted as homeless by the Council, existing tenants with arrears who are eligible for a transfer, applicants who have otherwise been given additional preference or are in Band One Plus
- Applicants who are homeless, in priority need with children and residing in temporary accommodation, where they have expressed interest but have not successfully bid for accommodation within a two month period
- Cases where we require the ability to fulfil duties in line with the Homelessness Reduction Act 2017
- Exceptional circumstances at any time where the Head of Service determines that there would be adverse financial impacts upon the Council if a direct offer were not to be made (to one or more applicants)
- Other exceptional cases where an applicant's needs (in relation to specific types, features or locations of accommodation) are such that there is limited reasonable likelihood of alternative suitable accommodation being available to offer within the next six months

This does not imply a guarantee of an offer of accommodation to applicants in the above or other categories within any defined period. Applicants within one of the above categories will be reviewed periodically and a decision made as to whether a direct offer is appropriate. If it is, the applicant will be considered for a direct offer when further properties become available. The timing of the offer will be based on property availability and suitability, contact with the customer in the period after the decision and balancing the number and type of direct offers made with consideration of other applicants who would not subsequently be able to express interest in the vacancy.

22.1.1 Only one direct offer will normally be made to any applicant in one of the above categories. Where the offer is refused and if on review (including a statutory review where the offer was made under an accepted homelessness duty) the offer is deemed to be acceptable, the applicant will lose priority status and be placed in Band 4 for a period of 12 months. "

We will also amend 14.1 (i), bullets (iii) and (iv) re refusals.

## Welfare and Medical Panels / Medical Needs Assessments:

### **Consultation Response:**

*Can we articulate within the Policy that Welfare / Medical panels will have a multi-disciplined membership to ensure fairness / equity and oversight with expeditious decision making. (perhaps further discussion about panel membership and oversight would be helpful)*

### **Action/Response: We have made improvements to both panels.**

The medical needs panel is formed of clinical experts from the NHS to ensure fairness.

The social (welfare) needs panel is made up of at least 2 of three senior members of the tenancy services team.

For both panels we have now set dates for the calendar year to ensure timely decisions are made. Both panels seek supporting evidence from professionals and/or support agencies to inform decisions and have the ability to request further information or to speak directly to agencies where required.

We do not therefore consider further changes are required in format but we will publish more details about this and the calendar, alongside the revised allocations policy once approved. We are also improving the assessment forms and individual customer correspondence about the assessments and panels. Collectively we hope this will help to ensure this is clearer and provides greater transparency.

### **Consultation Response:**

*Cases in which a couple or family who have one or more applicant with mental health conditions and are attempting to find a starter home or council property, need to be given much higher priority. Given that the cost of living is rising, more and more couples are finding it necessary to have both people working. However, many mental health conditions make this impossible and so severely restrict ability to afford private rental properties, especially if pets are also present as this makes the selection of suitable properties extremely limited. A stable calm and affordable home is conducive to improving mental health and reducing stress, and many young people are living at home with parents as a direct result of Covid when they should have their own property. Young people with mental health issues are being discriminated against in favour of families who have the means to afford a house and therefore should be given more help*

### **Action/Response: Thank you for this feedback.**

Medical needs assessments are undertaken independently by our medical needs panel which is made up of clinical experts from the NHS. They can independently award higher priority for applicants with both mental and physical conditions that are affected by their current housing circumstances and which would be resolved or eased by rehousing.

We will however take on board your comments in relation to clearer information for applicants about the medical needs assessment process.



**Prevention Duty:-**

*Re-visit this as being in Band 2.*

*Suggest-: Prevention cases are placed into Band 3 to start and increased to Band 2 after 28 days. This would require additional monitoring and administration. (perhaps further discussion on this as a banding suggestion).*

**Action/Response: No change proposed at this time.**

We appreciate the meaning behind this, but given the current supply and demand challenges we expect that if this was changed, all such applicants would be affected and simply be held for 28 days before being placed in Band 2. We don't consider the benefits outweigh the additional administration which would require review from both allocations and housing options teams.

## Applicants with outstanding debts:-

### **Consultation Response:**

*Re-visit the 12 months consistent payment arrangement / waiting time in Band 4.*

*This arrangement is a long time for people who are in a Homeless situation.*

*Suggest:- 6 months as a maximum payment arrangement time for 'Homeless applicants' before they can be re-considered for a higher banding.*

*A taper system of time depending on the amount of debt owed. (perhaps further discussion on this would be helpful.)*

### **Action/Response: Thank you for this feedback.**

**We will amend 14.1(i), bullet (vii)** to “*An applicant who has a housing-related debt with their current or former landlord and has a housing need will be placed in Band 4 to reflect their reduced preference. Regular repayments must have been made for a minimum period of 13 weeks*”

**We will also revisit the debt limits** as part of an applicant's right to review, in conjunction with our exclusion panel procedure review.

## **Other comments about the Policy / Consultation:**

### ***Consultation Response:***

*Difficult to answer many of these questions if you don't have the expertise or experience especially on the grades etc.*

### **Action/Response: Noted.**

Thank you for this comment. We have committed to providing an easy-to-understand document for applicants and others to explain what the key aspects of the revised policy mean to applicants and will be providing more and clearer information to applicants to support this as part of our housing application procedures and processes.

### ***Consultation Response:***

*I've gone through the 57 pages of the housing allocation policy review over the weekend I will attempt to make a response.*

*The first issue I feel must be addressed is the wordiness of the policy itself, for anyone who is not familiar with reading policy documents it's a daunting and overwhelming task. In addition to this people who have difficulties with reading, writing, or understanding written text or those with dyslexia or other learning difficulties or disabilities would not be able to understand the policies, I feel the housing policy is not inclusive as it does not take into consideration a significant portion of our residents who are vulnerable and in need of housing support. The document should be available in alternative formats for example an easy read version, voice document, braille and large print, I was unable to find any of these options, please direct to these formats if they are already existed. I would also be interested if we provide any policies in other languages besides English.*

*Representing the residents of my ward, I feel unable to direct them to the housing policy allocation review for the reasons given. I appreciate the need to cover so many aspects of social housing within the policy wording, but the length of text will only deter the residents from engaging in the process and works against the councils commitment to social inclusion.*

### **Action/Response: Noted - thank you for these comments.**

We appreciate that the main policy document is complex and lengthy because of the statutory guidance we have to follow and the range and depth of policy information which needs to be included.

We have committed to providing an easy-to-understand document for applicants and others to explain what the key aspects of the revised policy means and will be providing more and clearer information to applicants to support this as part of our housing application procedures and processes. We are also increasing applicant surgeries so that we can assist applicants with queries or who need our help.

We can provide large print or other formats for applicants on request of key information in line with wider Council policy. We also work closely with partner agencies and will liaise with support staff from a range of providers who work with

individual applicants, who are sometimes best placed to help provide information or support applicants with their queries.

**Consultation Response:**

*Initial observations are that the policy review documents are not easy to locate on the Council's website and even whether tenants or service users being given direct links or hard copies of the information, if they are easy to find. As it's a request for feedback, would anyone bother? If the target audience includes tenants/prospective tenants (i.e. members of the public) the collection of different documents is not well explained or the documents themselves that easy to read and understand. 5.2f (allocations which are excluded) on the Consultation Response Table for example is gobbledey gook! Plus it hints at officers being able to move the goalposts to suit, but without any kind of transparency in their reasoning? Amended wording definitely needed in my view. In general terms as well, my initial impression is that the new policy is designed to create more stringent conditions (obstacles?) to deter applicants and reduce the waiting list. I appreciate that the demand for council houses has to be managed, and probably therefore, some gateway assessment has to be done, but the issues lie with a lack of available housing and the council could be considered to not being open and transparent about the scale of the problem. Specifically though, and as an example – where there are three offers refused, (22.2)it would seem the applicant is being penalised for the lack of choice available. Not their fault surely if the housing stock is low. Also, what constitutes a “reasonable offer”? Reasonable to whom? Then there is the requirement to have 2 year residency within the district (Section 11.1(a)) – is that 2 years immediately prior to the application or at any time? I'm thinking of persons who may have been brought up in the area but left for all kinds of reasons, college, jobs, prison, gap year etc and have now returned to the district, possibly to a known support network of family and friends. As an aside – my personal view is that people should not have obstacles put in their way when they want to “repatriate” – especially the younger generation, they are the life blood that keeps communities ticking over. Regarding service standards (6 et seq)– and I'm sure this is a given anyway for most council officers, but it doesn't say so – include officers being overtly non-judgmental and having an awareness of whether an applicant is looking for a “forever” home, not everyone aspires to owning their own home and are happy to be lifelong tenants; and if a person is looking for a forever home, whether that would profoundly affect them accepting an offer, again three offers being refused puts an application in abeyance for twelve months. A compromise in requirements would be inefficient in the long run and the applicant would soon be looking to transfer. Which brings me on to transfers(9.2(a). Is it fair to have to have lived in a property 12 months? The time span on the application for a transfer could be considered in relation to the amount of time/compromise/necessity in accepting the current property. Arrears (9.3c) – considering the current cost of living crisis and disastrous financial situations a lot of people are finding themselves in, I would not like to see arrears as a “deal-breaker” in isolation, but a consideration as part of a much more wholistic approach. In fact, the application process in its entirety should, in my view, be “wholistic” – weighing up all the circumstances for the applicant, although for the most part it probably is.(s12 reasonable and additional preference covers that??) If it is generally known that there is a housing shortage, then folk will work out for themselves the likelihood of being offered a property – much like they do now I*

*guess – and if possible work out some other options. Not ideal, but realistic and more importantly – more honest if that’s the right word to use. We have a housing problem – like a lot of places in the country and we can’t just sweep it under the carpet, which appears to be the upshot of 20.7 Housing register review – the waiting list can be temporarily closed to ensure housing needs are met????*

**Action/Response:**

**Thank you for this feedback.**

We have committed to providing an easy-to-understand document for applicants and others to explain what the key aspects of the revised policy mean to applicants and will be providing more and clearer information to applicants to support this as part of our housing application procedures and processes. We expect that this will help remove the barriers you have expressed in accessing information and understanding how applications can be made and will be managed.

In reference to refusals, we will ensure transparency in the decisions made - to help inform applicants and enable them to request a review if they consider the decision is unfair. We do not consider the changes unfair to people who unreasonably refuse offers - where they can show that the offer was not reasonable and they have a good reason for refusal, no sanction will be applied. It is not possible to define all circumstances that are reasonable or not as we will consider each application on its own merit - we will however provide some further applicant information to assist further.

In reference to rent arrears, this will be looked at for each individual case and the effort the applicant has gone to resolve the issue (e.g. are they making efforts to pay) is key rather than just having a debt itself. Applicants again have a right of review if they consider they have been unfairly excluded or their application not fairly considered.

The waiting list being temporarily closed is a reserved option, which would only be used in exceptional circumstances at the discretion of the Head of Housing. This ensures the reasons for using it are sound, thought through and for a limited period to help ensure we assist applicants in the best way possible. Closing the waiting list would not affect the council’s legal duty to help those found to be homeless.

***Consultation Response:***

*Very clear and will work well with our Policy.*

**Action/Response:**

**Thank you for this feedback.**

**Consultation Response:**

*Summary, please consider houses that are empty in Cannock Chase, mindful some are not council houses.2. Please consider individuals that are homeless that are offered properties outside our area but feel they are not safe leaving the area, some i have come across have been suicidal due to not fitting the criteria for a property, is this fair. 3. Veterans that have problems finding properties or allocated them. 4. Damp, mouldy properties that are not healthy for residents, i believe there may be future compensation claims and that are nationwide reported on TV. 5. Customer service, follow ups with concerned residents. Please listen to residents as some are very concerned no one cares but are scared to report this. Thank you*

**Action/Response:**

**Thank you for this feedback.**

Your point 1 - the potential purchase of empty homes on sale for use by the Council is a strategic decision outside the remit of this policy review.

Your point 2 - we are not aware of the cases referred to and would be grateful for further information. We do consider applicants from outside the district and those having the most serious circumstances (who are accepted as homeless) are given priority. Those with lower needs are given a lower priority.

Your point 3 - we have agreed to increase the priority of current and former members of the armed forces (see detail in our earlier response on the comments under 'section on veterans').

Your point 4 - poor property condition is a housing need which we consider under this policy. Repair and maintenance of council homes is a key priority for the service, but is outside the remit of this policy review.

Your point 5 - We have committed to providing an easy-to-understand document for applicants and others to explain what the key aspects of the revised policy mean to applicants and will be providing more and clearer information to applicants to support this as part of our housing application procedures and processes. Applicants with any concerns about how their application has been treated are encouraged to let us know - either informally if they have a query or formally to request a review where a decision has been made that they consider is not in line with policy or unfair.

**Consultation Response:**

*The respondent generally made positive comments about the changes proposed, but also made some comments on specific areas. These are set out above.*

*Overall, they said: "This consultation was not particularly user friendly – it was rather difficult to understand and grasp even with an existing knowledge base gained through being a Councillor. I do not feel that this consultation enabled the public to easily contribute or express their opinions."*

**Action / Response:**

**Thank you for your response to the whole consultation document.** We appreciate you taking time to respond in such a comprehensive way and we are pleased that, on the whole you considered the changes were fair and thought through. We have responded to each of those areas where you had more substantive comments about the text or the approach below.

We take on board comments about the consultation and user-friendliness. This is very difficult to achieve for the wide audience in relation to a policy which, by its nature has to include legal and technical language. Nonetheless we are producing user friendly and easy to read information for applicants and others, which should help explain key issues and which we can use as a basis for further and future consultation and discussion with applicants, colleagues and others.

### **Survey Summary Results:**

The survey returns were too low for the results to be considered robust. However, all of those who responded supported all of the proposed key changes and said 'Yes' when asked if the changes were clear and they understood them.

Only 1 respondent said that they disagreed with some aspects of the proposed policy, others provided positive comments or other feedback. Those comments and our response to them are reflected above.