

**REPORT TO:** Executive Board

**DATE:** 14 June 2018

**REPORTING OFFICER:** Strategic Director - People

**PORTFOLIO:** Physical Environment

**SUBJECT:** Amendment to Housing Allocations Policy

### 1.0 PURPOSE OF REPORT

This Report presents to Executive Board a revised policy, to illustrate the minimal amendment to the Council's Housing Allocations Policy, Property Pool Plus (PPP).

The amendment to the Policy is in response to new legislation introduced by Government, in relation to Homelessness and Rough Sleeping. The policy changes are required to ensure they reflect and comply with the legal changes within the Homelessness Reduction Act 2017.

### 2.0 RECOMMENDATION: That

- 1) the report be noted;
- 2) subject to the unanimous agreement of the Local Authorities participating within the Sub Regional Property Pool Plus Scheme, the Board agrees to amend the Council's Housing Allocations Policy, to include the additional sub-banding, which will ensure that additional priority is awarded to those registered under Homelessness Prevention and/or Relief, in accordance with the Homelessness Reduction Act 2017; and
- 3) the Board approves the undertaking of a policy review for the purpose of further amending the Housing Allocations Policy, to take account of provisions within the Localism Act 2012, the Homelessness Reduction Act 2017 and the Housing Allocations Code of Guidance.

### 3.0 SUPPORTING INFORMATION

- 3.1 The Council's Housing Allocations Policy was approved by Board on the 3rd March 2011 and implemented with effect from the 9th July 2012 when the new Choice Based Lettings scheme 'Property Pool Plus' went live in Halton. It is a policy which is common to the other local authorities participating in the sub regional scheme.
- 3.2 In 2017 the Local Authorities were made aware of the Homelessness Reduction Act 2017, and notified of the administration changes within the Act, that would impact upon service delivery. Local Authorities were notified that as part of the Government's commitment to reduce homelessness and eliminate rough sleeping, the new regulations would be implemented April 2018.

- 3.3 The Homelessness Reduction Act was implemented in April 2018, and will undoubtedly, have an impact upon future housing allocations and priority preference. Due to the identified changes, it is necessary for Local Authorities to make subsequent policy and service changes, to ensure they are fully equipped to deliver and comply with legal statutory duty requirements.
- 3.4 The changes in legislation cannot and will not be effective in isolation. To truly be effective, these new duties need to be underpinned by a renewed departmental Government strategy and policies, to ensure suitable accommodation is available in areas where it is needed, to prevent homelessness, and that Councils have the resources required to respond adequately and compassionately.
- 3.5 The new duties identified place additional pressure upon Housing and Homelessness services to prevent and relieve homelessness. The Housing Solutions Team have been applying some of the identified measures for some time, which have proven very successful. However, the role of the team has changed significantly, with additional pressure to facilitate and promote positive move on and sustainability for vulnerable clients.
- 3.6 In order for the Policy to be effective and give preference to local residents, it must ensure that it is transparent, thus awarding priority banding that can be evidenced if challenged. The PPP scheme offers choice to clients sourcing social housing, with preference of area, based upon local connection, which will not be affected, e.g., if a client presenting as homeless within another LCR area and requesting Halton, they would have to demonstrate a local connection to the area. If they had no local connection, they could still register via the scheme, but would be awarded low priority banding.
- 3.7 The policy will offer additional priority to clients presenting as homeless, who are registered under prevention / relief criteria, e.g., a client presenting as homeless, would be offered temporary accommodation and registered under relief. This would allow the officer 56 days to explore all housing options to resolve homelessness. Prior to the policy changes, the client would not be awarded priority banding until after the homelessness decision making process was completed. However, in accordance with new legislation and policy proposals, the client would be placed in priority sub bands with immediate effect, thus allowing them to source accommodation via the PPP housing register and resolve homelessness situation.
- 3.8 The regulations require that, where Local Authorities decide to use the prevention and/or relief powers as a qualifying criterion (i.e. to join the housing register), they must apply the following criteria in accordance with legislative guidance, to ensure vulnerable homelessness clients qualify for social housing allocations
- The Act places new duties on Local Authorities to relieve and prevent homelessness for all families and single people, regardless of priority need, who are eligible for assistance and threatened with homelessness.
  - A change in the allocated time period for which a Local Authority should treat someone as threatened with homelessness has been extended from 28 days to 56 days.

- The provision represents a shift in focus to early intervention, with the aim to promote early interaction and a more proactive approach.
- A new duty to prevent homelessness for all eligible applicants threatened with homelessness, regardless of priority need. This further extends the help to people not in priority need, with pressure placed on Local Authorities to support them to resolve the housing/homelessness issues.
- A new duty to relieve homelessness for all applicants regardless of priority need. This will place additional pressure on Local Authorities to accommodate all applicants, pending the homelessness decision making. Furthermore, a homelessness decision cannot be made during the 56 day period and can only be issued on 57th day.

3.9 The PPP Policy needs to be amended to reflect the national changes in legislation. The PPP sub banding within Bands A and B, will address the homelessness prevention and relief criteria, thus, giving priority to those clients in greatest need to access suitable housing options. The banding change will also reduce the impact upon temporary accommodation services and promote positive move on and sustainability.

3.10 Further changes to the Policy are being considered as a consequence of new freedoms contained in the Localism Act 2011 and HRA 2017. Additionally, changes are necessary to clarify and improve the existing Policy have also come to light since the introduction of the HRA. It is therefore proposed that the Sub Regional Local Authorities collaborate on a common consultation exercise, to seek views and explore the options to address and deliver a comprehensive allocations scheme, with the inclusion of a homelessness prevention and relief category within the banding scheme.

3.11 It is necessary for a full Policy review to be undertaken to address the needs of all clients and to ensure that the priority categories and criteria is fully compliant with national trends and legislation. The Registered Social Landlords have commissioned consultants to undertake a review of social housing allocations, and agreed the report will be submitted available mid-August 2018.

The sub regional Local Authorities are proposing that the Policy review will be undertaken later in the year. The purpose of the review will be to address the findings of the RSL report and identify the substantial policy changes to the PPP Allocations process.

3.12 A similar recommendation is to be presented to the Cabinets of the other partner authorities, and the Management Team is requested to agree this change subject to the unanimous agreement of all authorities.

3.13 Subject to Board agreeing to the policy review, it is anticipated that it would commence later in the year, with results and recommendations coming back to Board in the Spring 2019.

#### 4.0 **POLICY IMPLICATIONS**

4.1 The practical impact of the sub banding will increase volume within Banding A and B and the subsequent sub banding. The amendments are minimal, but necessary to meet the requirements of the HRA and meet the homelessness requirements.

For this reason it is not proposed to undertake formal consultation for this specific Policy change, but to simply inform applicants on the Property Pool Plus register when the change is agreed and comes in to effect.

**5.0 FINANCIAL IMPLICATIONS**

5.1 There are no financial implications for the small amendment changes. Also the Policy Review will be funded from the MHCLG Housing First Programme, therefore, no additional financial implications to the Local Authority.

**6.0 IMPLICATIONS FOR THE COUNCIL'S PRIORITIES**

6.1 **Children & Young People in Halton Borough Council**  
None at this stage

6.2 **Employment, Learning & Skills in Halton**  
None at this stage

6.3 **A Healthy Halton**  
None at this stage

6.4 **A Safer Halton**  
None at this stage

7.0 **RISK ANALYSIS**  
None at this stage

8.0 **EQUALITY AND DIVERSITY ISSUES**  
None at this stage

**9.0 LIST OF BACKGROUND PAPERS UNDER SECTION 100D OF THE LOCAL GOVERNMENT ACT 1972**

<b>Document</b>	<b>Place of Inspection</b>	<b>Contact Officer</b>
PPP Housing Allocations Policy.	Runcorn Town Hall	Principal Manager Homelessness