

**REPORT TO:** Executive Board

**DATE:** 10<sup>th</sup> July 2025

**REPORTING OFFICER:** Executive Director, Adults

**PORTFOLIO:** Housing and Environmental Sustainability

**SUBJECT:** Property Pool Plus Policy Amendments and future delivery options

**WARD(S)** Borough-wide

## **1.0 PURPOSE OF THE REPORT**

1.1 This report seeks approval for the implementation of several changes to the Property Pool Plus Housing Allocations Scheme and consideration of the future of the service.

1.2 The current Housing Allocations Scheme was implemented in January 2024. However, the sub-regional Contract Board which oversees the allocations scheme reviewed the policy and identified several changes, which are required to improve its effectiveness in meeting local housing need and responding to the increased demand on homelessness services and associated temporary accommodation. The contract for this service is due to expire in March 2026.

1.3 If approved the amended Allocations Scheme will support at least two of the objective aims.

- **To prioritise those with the greatest need.**
- **To deliver council services within the means of the council budget.**

1.4 This matter is a Key Decision as it affects all wards, and all households currently registered for rehousing via the scheme, and any household wishing to apply for an allocation of social housing through the scheme in the future.

## **2.0 RECOMMENDATION: That**

- 1) the report be noted; and**
- 2) approve the proposed changes to the Housing Allocations**

## **Scheme Policy (Property Pool Plus)**

### **3) The relevant Policy and Performance Boards to review PPP Housing Allocation Scheme during the current year.**

#### **3.0 SUPPORTING INFORMATION**

- 3.1 The Property Pool Plus (PPP) Housing Allocations Scheme is a jointly administered scheme across the five Local Authority areas of Halton, Knowsley, Liverpool, Sefton, and Wirral. The scheme has been in operation since July 2012. In 2019 the PPP partner councils commissioned an independent review of the scheme which resulted in the approval of a revised PPP allocations policy and upgraded IT system which was implemented in January 2024.
- 3.2 Halton Housing have maintained the housing register and allocations contract for a number of years. As the contract is due to cease in March 2026, it is necessary to consider the future validity of the administration of the scheme. Options that are being discussed for consideration are:
- LCR central allocations administration scheme – which may prove more cost effective
  - Bring Allocations administrations service back into the Local Authority
  - Continue to outsource the service.
- 3.3 The PPP scheme meets the requirements on the Local Authority to allocate social rented housing in accordance with statute, statutory guidance, and regulations and orders issued by the UK Parliament and the UK Government. The PPP scheme is a sub-regional scheme which enables people seeking social and affordable housing to register on-line. Applicants are required to meet a range of eligibility and qualification criteria relating to issues such as immigration status, local connection, previous tenancy conduct, acceptable behaviour, home ownership and savings. Applicants are required to provide a range of documents to verify the information provided on their registration form. Administering partners check applicants' eligibility and qualification to join PPP when they initially apply and when an allocation of a property is made.
- 3.4 Once accepted onto the scheme applicants are prioritised based on the urgency of their housing need using detailed criteria set out within the policy priority banding system. Statute stipulates that some applicants must be afforded a reasonable preference for rehousing, and that the local authority may frame the allocation scheme to give

additional preference to particular descriptions of people who fall within the statutory reasonable preference categories and have urgent housing needs. Under the PPP scheme Band A includes those applicants who have been determined to have an additional preference and Band B includes those with a reasonable preference. Applicants with no additional or reasonable preference are placed in Band C. Band D consists of applicants who have exhausted their right to refuse an allocation of social rented housing.

3.5 PPP operates on a Choice Based Lettings model whereby properties becoming available for letting are advertised on the scheme website for registered applicants to express an interest (bid), subject to meeting the property eligibility criteria e.g. property size. At the end of the property advertising cycle applications for each property are sorted into a shortlist order based on their level of priority for rehousing i.e. their priority band. Where two or more applicants have the same priority band, then the earliest band effective date receives preference. In situations where the priority band and band effective date are the same, then the earliest registration date would take preference, following this, those making a community contribution as defined in the scheme policy would take preference.

3.6 Since the implementation of the policy in January 2024, there has been a reasonable settling in period, allowing time for the PPP Scheme Local Authorities to evaluate the new policy at scale. This has resulted in a recognition that some amendments need to be made to the policy including:

- **Three significant changes** which will have an impact on a substantial proportion of those applying for rehousing via the PPP scheme. Local Authorities are proposing these changes in direct response to the increased demand on the partner local authority homelessness services and associated temporary accommodation costs. If implemented, these changes will assist the local authorities to manage the increased demand on their homelessness services more efficiently.
- **Minor policy changes** which will have a limited impact on a minority of applicants, but which will improve the local authority's ability to administer the policy and meet housing need more effectively.
- **A range of wording changes** to improve clarity, and to correct identified errors and inconsistencies.

3.7 **Significant Changes.**

- 3.7.1 There are three significant policy changes being proposed, which will impact a considerable proportion of those currently on the housing register.
- 3.8 Increase to Band A for Local Authority commissioned homeless supported / hostel move on cases.
- 3.8.1 Since the current PPP policy was approved by the participating local authorities in 2022 the demand for social housing in the scheme area has increased as a direct result of an increased demand on Homelessness services. This has resulted in a steady increase in the proportion of property allocations to applicants in Band A, with fewer properties going to lower bands including those in Band B who are ready to move on from Local Authority commissioned homeless supported / hostel accommodation. In addition, the increase in priority to Band A for young people leaving the care of the local authority introduced in January 2024 has been a key driver in the increase in the proportion of properties going to Band A, with a significant proportion of allocations to Band A going to this group rather than other groups in Band A such as homeless cases. Although the impact of this change is beginning to ease as those care leavers who have been waiting for accommodation for a long time are being housed, the overall impact will be long term due to the increase in priority for this group.
- 3.9 Any reduction in allocations to Band B applicants moving on from LA commissioned hostel / supported homeless provision causes issues for the homelessness service. They are unable to refer new clients who need this provision due to a lack of availability, resulting in less appropriate accommodation options having to be used. Moving these applicants to independent accommodation will free up space to enable the Homeless Team to manage caseloads and associated temporary accommodation costs more effectively. This will also enable those who are ready for independence to move on with their lives without the restrictions that residence in supported accommodation places on them such as preventing take up of employment due to the reduction in benefits, and prohibitive costs of funding the accommodation independently.
- 3.10 Under the existing policy those who are ready to move on from short term supported / hostel accommodation are awarded Band B Reasonable Preference. For those whose accommodation is local authority contracted, this priority is backdated to the date the applicant moved into the short term supported / hostel

accommodation. The proposed change would see a proportion of these applicants who are currently included in the Band B provision for move on, having their priority increased to Band A Additional Preference. This change would only apply to those applicants who are ready to move on from local authority contracted / grant funded short term supported / hostel accommodation which is local authority homeless provision. All other move on cases would remain in Band B in line with the current arrangements.

3.11 Most applicants moving to Band A under this proposal would no longer benefit from a backdate to their band date, as they do currently in Band B. This would mean that the Band A priority would only be awarded from the date the applicant is assessed as being ready to move to independence.

3.12 Any young people meeting this new Band A criteria who are Section 17 child in need cases, will have their Band A backdated to the date they moved into the supported accommodation. This is to allow for situations where a young person may not qualify for PPP when they move into the supported accommodation due to being under 18 and not having a trustee in place. This change, together with the change to the qualification criteria for this group to allow individual local authority protocols to prevail, will facilitate local authority Housing and Children's Services to work closely together to plan the most appropriate pathway for young people accessing these services. As Care Leavers in Band A are awarded a Band backdate to their 16<sup>th</sup> birthday, they will still receive a higher priority than section 17 young people in local authority homeless / hostel provision who are awarded Band A.

3.13 The proposed changes to Band A will assist the local authority homelessness teams to better manage the demand on homelessness services and the associated temporary accommodation costs.

3.14 Amendments to the Discretion criteria

3.14.1 The discretion criteria set out in the current policy is limited in scope and only covers certain groups of people including:

- Providing protection to people who need to move away from another local authority area, to escape violence, harm, or intimidation.
- In circumstances where an applicant needs to move due to a serious offence (equal to MAPPA level 2 or 3), as defined by the Serious Crime Act 2007, Part 1, Schedule 1, there will be joint

working with the Police, Probation Services, Adult Care Services, health professionals, registered providers, and other bodies, to manage any risk to the community.

- In circumstances where a member of the Armed Forces community has been disadvantaged in respect of their ability to access suitable housing through their own or their family member's service in the Regular Armed Forces or Reserve Forces.

3.15 Since the current policy was implemented in January 2024 local authorities have already identified cases that have an exceptional urgent welfare need and require intervention to assist with rehousing more quickly than can be facilitated via the policy. This has resulted in the recommendation to add an additional point to those listed above to allow for intervention in these exceptional welfare cases via a direct offer of accommodation. Additionally, the criteria have been amended to make clear that where discretion is applied this should only be in situations that are exceptional in nature and where the consequences of not applying discretion have been considered. To ensure that discretion is applied consistently across the sub-region, a discretion register will be introduced once the policy is approved.

3.16 The discretion criteria have also been amended to allow local authorities to vary their policy to implement a period where a proportion of lettings will be offered via direct lettings to key groups. This flexibility allowing local authorities to implement a period of direct lettings will enable them to respond to crisis situations such as the recent extreme demand on homelessness services and associated temporary accommodation costs. Another example would be the housing crisis experienced during the COVID pandemic.

3.17 A further point has been added to the discretion criteria to allow local authorities the flexibility to implement pilot trials of new ways of working to inform future service delivery and potential scheme improvements to meet local housing need. Any variation to the scheme being proposed, either in the form of a pilot trial or a period of direct lettings, will only be implemented following approval via a separate decision by the individual local authority, with full details of the variation published on the PPP website. Any variation will also take account of the local authority's Housing Strategy and Tenancy Strategy.

### 3.18 Cross Boundary Moves

3.18.1 Since the new policy was implemented in January 2024 some of the

local authorities have experienced a significant increase in the proportion of properties in their area being allocated to applicants who are not current residents in that local authority area. This is due to the removal of the previous 5% cross boundary mobility cap. To maintain a balanced approach giving existing residents of a local authority a reasonable chance of securing accommodation in their area, it is proposed that the 5% cross boundary mobility cap is reintroduced.

- **Each local authority** will monitor the proportion of all their properties advertised through the scheme which are allocated to applicants living outside that local authority area. This will include all applicants who are not living in the allocating local authority area, regardless of whether they can demonstrate a local connection to that local authority area as detailed in section 3.2.8. of the policy.
- **If the number of allocations to non-resident applicants** exceeds 5% net in any 12-month period, then that local authority may choose to implement an allocations approach whereby properties will be advertised giving preference to residents in that local authority area. Where this is implemented, it will be monitored on a quarterly basis and either removed / or continued as required, to maintain a maximum of 5% net inward migration. Where properties are advertised giving preference to local authority residents under this provision, exemptions will be afforded to the following groups:
- **Members of the Armed Forces** Community who are exempt from local connection criteria as defined in section 3.2.14.
- **Persons who are victims of domestic abuse or threats of domestic abuse**, or escaping domestic abuse or harm, will be exempt from local connection requirements, as will those who have sought a place of safety in a refuge or other form of temporary accommodation in the local authority area.
- **Care leavers** – persons aged up to age 25, who are owed a duty under the Children Act 1989, section 23C, by one of the scheme partner local authorities.

### 3.19 Minor changes

- 3.19.1 There are several minor changes identified that will improve the Policy in terms of the local authority's ability to administer the policy and meet housing need more effectively. These are detailed in the following points.

### 3.20 Qualification - Section 17 Child in need cases

- 3.20.1 The existing qualification criteria does not extend to persons defined as a child in need as a result of a statutory assessment under the Children Act 1989 section 17.
- 3.20.2 The existing policy includes a stipulation that any protocol agreed between the local authority's Housing Services and Children's Services will be taken into consideration when making qualification decisions about care leavers, but this does not currently extend to child in need applicants who are not care leavers.
- 3.20.3 The policy changes proposed will extend this provision to incorporate Section 17 children in need applicants who are not care leavers.
- 3.20.4 The changes will enable local authority Housing Services and Children's Services to set up joint protocols to better manage and respond to the housing needs of young people accessing these services.
- 3.21 Qualification – Unacceptable behaviour.
- 3.21.1 The existing policy includes scope to disqualify applicants who are unsuitable to be a tenant due to unacceptable behaviour which includes reference to causing annoyance or nuisance to staff carrying out housing management functions.
- 3.21.2 The proposed changes expand this criteria to include applicants where they, or any member of their household, has displayed abusive or threatening behaviour towards members of staff involved in the administration of the PPP Scheme.
- 3.21.3 It is not anticipated that this will impact many applicants but there have been incidents in the past where there has been abusive or threatening behaviour toward PPP staff which is considered serious enough to make an applicant unsuitable to be a tenant.
- 3.21.4 This change will allow local authorities to disqualify such applicants until such time as they can demonstrate improved behaviour.
- 3.22 Qualification – Local connection.
- 3.22.1 The proposed changes recommend that the policy criteria for local connection are expanded to make clear that those who have been newly granted refugee status and are owed a statutory homeless duty by one of the Scheme local authorities, as well as those placed in the area under the 'Homes for Ukraine Scheme' are exempt from the local connection criteria.
- 3.22.2 This is in line with current processes and local authority statutory responsibilities to assist applicants in these situations.



### 3.23 Qualification - Care Leavers.

- 3.23.1 The existing policy includes criteria relating to care leavers who are placed out of the borough but are owed a duty by one of the local authority areas under the Children Act.
- 3.23.2 The existing policy wording allows for a continued local connection to the area up to age 21, or 25 if they are pursuing a programme of education agreed in their pathway plan.
- 3.23.3 The criteria have been extended to age 25 regardless of education status. This change is in line with the local authority statutory parenting responsibility.

### 3.24 Qualification – Savings exemption.

- 3.24.1 Two new disregards to the qualification criteria for the savings threshold are being proposed for:
- ***Those who are ready to be discharged from hospital / residential care but are unable to do so because their current home is unsuitable for their needs to the extent that they would be at risk in the property, and where other potential short term and long-term solutions such as adaptations, have been considered but deemed unfeasible. This brings the criteria in line with the existing disregards to the homeownership qualification criteria and recognises the urgent housing need of this group and the need to move them quickly to free up space in hospitals / residential care.***
  - ***Applications which include a household member who is severely disabled and requires rehousing to a substantially adapted property, and where adaptations to the owned property have been assessed by the LA's department responsible for adaptations but deemed unfeasible, and where the equity available in the owned property together with any savings are insufficient to source a suitable adapted / adaptable property in the area. This change takes account of the barriers in accessing substantially adapted accommodation for those who need this type of accommodation.***

### 3.25 Qualification – Homeownership exemption.

- 3.25.1 Two new disregards to the homeownership criteria for:
- ***Households that include a person with disabilities who needs a move to a substantially adapted property in line with the savings***

*disregard.*

- ***Those who cannot return to their property due to safety concerns e.g. Ukrainian Refugees who own a property in Ukraine.***

3.26 Qualification – Domestic abuse victims.

3.26.1 Additional disregard for tenancy related debt added to the qualification criteria for victims of domestic abuse.

3.26.2 This change is in line with the Domestic Abuse Act 2021 and recognises the need to remove barriers to rehousing for these applicants due to the urgency of their housing need.

3.27 Qualification – Armed Forces

3.27.1 Removal of the five-year time limit on the disregard to local connection criteria for those who have served in the Regular Armed Forces.

3.27.2 This is to incorporate the December 2024 amendment to the Allocation of Housing Statutory Guidance for the qualification criteria for Armed Forces.

3.28 Prioritisation Band A – Care Leavers.

3.28.1 The Band A criteria for care leavers has been updated to reflect the original intention in the existing policy to award Band A, including a backdate to the 16<sup>th</sup> birthday for those leaving the care of the local authority for the first time, at the point they are ready for independence. The existing policy does not make this clear.

3.28.2 The proposed amendments provide further clarity and explicitly stipulates that if a care leaver up to age 25 needs to be rehoused again following their initial move to independence, then they can be awarded Band A, but only if there is a recognised housing need, and the applicant is actively engaging with the Local Authority Care Leaver Teams, and that team is supportive of a move.

3.28.3 The proposed change also makes clear that if Band A is awarded for a subsequent move, then a backdate to the 16<sup>th</sup> birthday will not be applied. This change brings the policy in line with the original intention, whilst still recognising the local authorities' corporate parenting responsibility for care leavers up to age 25.

3.29 Kinship Carers.

3.29.1 The Band A criteria for those approved by the local authority who need to move to a larger property has been extended to include long term kinship arrangements in line with statutory requirements.

### 3.30 Prioritisation Band D – Failure to bid.

3.30.1 The criteria in Band D for those who have failed to bid on more than three properties in a rolling 12-month period has been removed. This is due to the complexity of implementing this within the IT system, as well as the administrative burden of implementing something which penalises applicants who may make an informed choice not to bid for properties that they have no realistic chance of being offered.

3.30.2 This element of the policy has never been implemented and will not adversely impact any applicants.

### 3.31 Clarification and Corrections.

3.31.1 Following implementation of the current policy it has become apparent that there are sections of the policy that need clarification, to ensure the wording is explicit and adequately detailed to fully describe the way the policy is applied in practice.

3.31.2 In addition to the above there are a small number of changes being proposed to make the policy easier to read and understand for all those accessing it. The proposed amendments for clarification purposes do not change the meaning of the policy or the way it is applied currently.

There are a small number of changes which are corrections e.g. incorrect references, spelling, punctuation etc.

These proposed changes for correction purposes do not change the meaning of the policy or the way in which it is applied currently.

### 3.32 Engagement / Consultation.

3.32.1 The existing PPP Allocations scheme which was implemented in January 2024 was the subject of a full public consultation prior to implementation. The proposed recommendations are for changes to be made to the existing scheme.

3.32.2 In line with current statutory guidance and legal requirements a consultation exercise was undertaken in relation to the proposals which extended to registered providers of social housing who the local authority has nominations agreements with, other partner organisations, and scheme applicants.

3.32.3 The consultation ran for a 28-day period from Monday 20<sup>th</sup> January 2025 to Sunday 16<sup>th</sup> February 2025. The responses to each proposal present a mix of those in favour and those opposed to the change. The local authority's original considerations when devising the policy

changes included a strong rationale for each change, as detailed in the consultation.

### 3.33 Policy Impact

- 3.33.1 As stated above, the amendments to the policy are aimed to ensure that vulnerable households are awarded the priority banding to enable them to access secure social housing.
- 3.33.2 The main changes to the policy are banding priorities, with many client groups being awarded Band A, which identifies the level of housing needs and offers priority housing status.
- 3.33.3 The policy changes will have a vast impact upon Band A, which will result in a further increase in the number of clients registered in that banding. Although, this will give clients a higher priority when allocating available properties, it will also further minimise property allocations to those clients within the lower PPP bandings.

## 4.0 **POLICY IMPLICATIONS**

- 4.1 The social housing allocations scheme is a core service and the outlined amendments to the Allocations Policy and Procedures for Property Pool Plus will reflect the latest legislation changes.
- 4.2 LAs must adhere to the law regarding the allocation of Social Rented Housing, as set out in the Housing Act 1996, Part 6 Allocation of Housing Accommodation. Every local housing authority in England must have a scheme (their “allocation scheme”) for determining priorities and as to the procedure to be followed, in allocating housing accommodation. For this purpose, “procedure” includes all aspects of the allocation process, including the persons or descriptions of persons by whom decisions are taken.”

## 5.0 **FINANCIAL IMPLICATIONS**

- 5.1 There are no resource implications arising from the recommendations of this report. There are existing revenue budgets in place to fund the operation of an allocations service, which is currently performed by Halton Housing. There is an existing revenue budget to fund the annual operation of an IT system.

## 6.0 **IMPLICATIONS FOR THE COUNCIL’S PRIORITIES**

- 6.1 **Improving Health, Promoting Wellbeing and Supporting Greater Independence**  
Facilitate a choice-based lettings process to promote access to suitable social housing, to promote stability, thus improving health and wellbeing, resulting in greater independence.

- 6.2 **Building a Strong, Sustainable Local Economy**  
Facilitate sustainable economic prosperity and resilient communities with the provision of suitable secure tenancies with social landlord's supports community stability.
- 6.3 **Supporting Children, Young People and Families**  
Many vulnerable people rely on accessing social housing for a home to live in and providing access to a stable home supports community wealth building on providing sustainable and resilient communities. The opportunity to have a settled affordable accommodation also offers stability for employment and enables people to thrive, particularly those with vulnerabilities, children and care experienced young people.
- 6.4 **Tackling Inequality and Helping Those Who Are Most In Need**  
The proposed policy changes will tackle inequality and identifies that those most in need will be awarded high priority banding to secure social housing.
- 6.5 **Working Towards a Greener Future**  
Valuing and Appreciating Halton and Our Community. The policy reflects the process to allow clients to secure social housing, therefore promote community stability within the Borough.
- 6.6 **Valuing and Appreciating Halton and Our Community**  
None.

## **7.0 RISK ANALYSIS**

- 7.1 The Local Authority has a public law duty to accept applications from any member of the public, for an allocation of social rented housing. The Allocations Scheme must meet all relevant statutory and legal requirements. Failure to operate such an allocation system will mean the Council is in breach of this duty.

## **8.0 EQUALITY AND DIVERSITY ISSUES**

- 8.1 Halton Council has a legal requirement to make sure its policies, and the way it carries out its work, do not discriminate against anyone.
- 8.2 An Equality Impact Assessment is a tool to help the Council services identify steps they can take to ensure equality for anyone who might be affected by a particular policy, decision, or activity.
- 8.3 A comprehensive Equality Impact Assessment was undertaken in relation to the recommendations for changes to be made to the PPP Scheme Policy.

## **9.0 CLIMATE CHANGE IMPLICATIONS**

- 9.1 There are no environmental, biodiversity or climate change implications arising from these recommendations.

### **KEY DECISION ON THE FORWARD PLAN**

## **10.0 REASONS FOR DECISION**

- 10.1 To ensure that the Allocations Policy is in line with current legislation, case law, good practice, and meets local priorities it is necessary to periodically update and review the current iteration. The existing scheme has been in operation since January 2024.
- 10.2 The changes being proposed fall into three categories: three significant changes to assist the participating local authorities to respond more effectively to the demand for social housing; minor policy changes that will impact a relatively small number of applicants; minor changes to improve clarity.

## **11.0 ALTERNATIVE OPTIONS CONSIDERED AND REJECTED**

- 11.1 The option to continue to operate the current scheme policy without change has been considered but discounted due to the need for the Council to improve its ability to meet housing need in the area and to respond to the increased demand on homelessness services and associated temporary accommodation pressures.

## **12.0 IMPLEMENTATION DATE**

- 12.1 The Property Pool Plus (PPP) Housing Allocations Scheme is a jointly administered scheme across the five Local Authority areas of Halton, Knowsley, Liverpool, Sefton and Wirral.

Each Local Authority will seek approval from their respective Management Boards, with a view that the policy will be implemented July/August 2025.

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

- 13.1
- | <b>Document</b>  | <b>Place of Inspection</b> | <b>Contact Officer</b>                              |
|--|----------------------------|---|
| Property Pool Plus Allocations Policy<br><br>Housing Allocations Policy can be found on Property Pool Website<br><a href="https://www.propertypoolplus.org.uk">https://www.propertypoolplus.org.uk</a> | Runcorn Town Hall          | Patricia Preston,<br>Principal Homelessness Manager |