

Summary of Main Changes

1. Prioritising households in most need:

- The Housing Allocations Policy (HAP) introduces a new 'Emergency Need' category. Households in this category will be afforded the highest priority, as social housing has been deemed as the only viable option for them. All other housing allocations will be made utilising a Choice Based Lettings (CBL) system, which exists now, wherein households are prioritised in either Band A, B, C or D according to their level of housing need. This provides greater flexibility than a purely CBL system, particularly in situations where there is an urgent need to provide assistance.
- The HAP will remove eligibility for the Housing Register to those who do not reside in the district. There will be a number of exemptions to this, including those who can evidence a need to either provide care and support to a family member or receive it; additional exemptions include care leavers, those requiring specialist hospital treatment and those who work in the district but are not resident. There are currently around 500 households on the register who are not Rother residents and whose only local connection to the area is through a family member; it would significantly reduce the number of households on the register as well increase the chances for those remaining if these were removed.
- The HAP will ensure that allocations are made to applicants with an identified housing need; all households currently in Band D – on the basis that they have no identified housing need - will be removed. There are around 180 clients who have no other housing need other than a preference for sheltered accommodation. This change means that applicants who are adequately housed and have no housing need will be removed, in line with the strategic aims of the HAP. The change will also reduce the number of clients on the Housing Register and therefore increase the chances for those remaining on it. Band D will remain for those who have refused a final offer of accommodation and also for those who the Council have determined have worsened their own circumstances. Such applicants will remain in the band for a six month period.
- The HAP will amend the current savings and income threshold to ensure that only applicants who do not have the resources to resolve their own housing situation are permitted to join the Housing Register. Instead of a fixed income threshold, household incomes will be assessed to establish whether it is reasonable for them to afford alternative accommodation in the private rented sector. As a guide, spending less than 32% of one's income in rent / mortgage payments would exclude a household from being eligible.
- The HAP will reduce the permitted savings threshold (currently £24,000) in line with capital sums for Universal Credit purposes, which is currently £16,000. The Council will disregard disability payments for former members of the armed forces following discharge, Disability Living Allowance (DLA) payments, Personal Independent Payments (PIP) and applicants with significant mobility issues, so this does not adversely affect their opportunity to find suitable accommodation.
- The HAP will amend the criteria at which point former social housing or housing related debt owed to the Council prevents access to the housing register; this is to be reduced to £600.
- The HAP, as a result of new bands, has also banded some things in a different way to the current policy; every significant band change and band

reason was discussed in the consultation questionnaire respondents were asked to complete. The key priorities in terms of the policy's aims were also discussed in full and support for these was also sought.

2. Reduce TA use and prevent homelessness

- The HAP will award priority to those at risk of homelessness and to whom the Council would owe a main homelessness duty if their homelessness was not successfully prevented. To qualify for the priority, applicants would have to be fully engaged with the Council and be completing the tasks outlined within their Personalised Housing Plan (PHP), which is designed to support applicants to secure alternative accommodation in the private rented sector. The change would also prevent vulnerable households, including those with children, from the detrimental psychological and emotional impact of becoming homeless and being placed into emergency accommodation.
- The current HAP awards households that are accepted as homeless and in TA the highest priority. It is felt that this approach can sometimes incentivise homelessness as a route to social housing. The HAP introduces a lower level of priority for accepted homeless households in TA (Band B). Placing clients in a lower band may increase the length of time it will take them to be rehoused into social housing; however, experience in other local authorities is that the measure reduces the number in TA overall, as becoming homeless is removed as an expedited route to accessing social housing.
- The HAP will enable the Council to award the Emergency Band after six months, provided the applicant is fully engaging with support and has exhausted all other options to secure accommodation in the private rented sector, for example. This will continue to allow the Council to secure social housing for those in TA, if required.
- The HAP introduces a priority for households who make their own TA arrangements rather than accessing TA. This would apply to applicants who received an outright possession order or eviction notice through no fault of their own. The household would also have to be fully engaged with the Council and be completing the tasks outlined within their PHP. The change will incentivise households to make their own temporary housing arrangements and reduce the Council's costs on TA, storage and removals. It would also prevent vulnerable households, including those with children, from the detrimental psychological and emotional impact of being placed into emergency accommodation. The Council will undertake rigorous checks to ensure that the safety of households is always prioritised and will not encourage any accommodation arrangements to be made where any safeguarding concerns exist.
- The HAP introduces a higher priority for those threatened with homelessness where it has been determined that this is through no fault of their own, to allow more preventative options and the opportunity to secure social housing at an earlier point to try and prevent a need to move into TA.

3. Support for former rough sleepers

- The Council has secured funding for accommodation through the Next Steps Accommodation Program (NSAP) and Rough Sleeper Accommodation Program (RSAP). The Council now operates a Housing First scheme, providing supported accommodation to former rough

sleepers. Under the terms of the funding, clients are only able to reside in the accommodation for a maximum of two years. It is therefore necessary to award an Emergency Band need to clients who have demonstrated they have the independent living skills to move into independent accommodation, so that vacancies can be created within the Housing First scheme.

4. Encourage clients to accept private rented accommodation

- During a recent service review from the Department for Levelling Up, Housing and Communities (DLUHC), they suggested that the Council could do better at incentivising homeless households to accept housing offers in the private rented sector. The new HAP will allow such households to retain a Band C following their accepting a private rented accommodation offer.

5. Reduced priority for non-co-operation

- Following the introduction of the Homeless Reduction Act (2017), there is a statutory requirement for applicants to take the necessary, agreed steps, in their PHP to resolve their housing situation. Where applicants deliberately refuse to co-operate with their PHP, then their priority on the Housing Register could be reduced to Band D for six months. Clients, who are vulnerable to the extent it is not reasonable to expect them to co-operate, would not be affected. The new measure will encourage clients to take the reasonable steps as set out in their PHP which could prioritise other types of housing, such as the private rented sector or supported accommodation. It will penalise those who deliberately refuse to actively engage in resolving their homelessness.

6. Medical priority and unsatisfactory housing conditions

- The Council is required by law to award reasonable preference to people with medical needs that make their current accommodation unsuitable. In addition, local authorities must provide reasonable preference to those in unsatisfactory housing conditions due to overcrowding, or significant disrepair, for example. The HAP does not propose to make significant changes to these categories.

7. Auto bidding for homeless applicants

- The HAP will introduce auto bidding for all homeless applicants to ensure that accommodation opportunities are being maximised. The suitability, including affordability of accommodation, is fully considered prior to any offer being made to a household.

8. Priority date changed

- The HAP currently awards successful applicants a priority date which, in most circumstances, will represent the date they were placed into their priority band. Available properties will be allocated to the bidder in the highest band of priority with the earliest priority date. This will continue, however the priority date for homeless applicants owed the main housing duty (s193(2)) will be the date they initially presented to the Council and were owed either the prevention or relief duty (whichever is the earliest).

9. **Ability to develop local lettings plans**

- The Council wishes to retain the ability to develop Local Letting Plans. Local Lettings Plans allow the Council to consider direct lets to respond to local conditions. It means we can consider balancing local communities or prioritising people with strong local connections to fit into the community. A direct let is where bidding is by-passed and we make an offer directly to applicants that meet the plan's criteria. These are often developed at the point the development is going through the planning process. The HAP proposes allowing those who have family connections only to Rother to be placed in Band D, so they can be considered for any such schemes should they arise.