The Housing Board for Cambridgeshire, Peterborough, and West Suffolk meeting,

14 August 2020 via Microsoft Teams

Questions on CPCA Allocations

Emily Mulvaney of CPCA discussed the updated document £100k Homes Allocations Policy and Guidance. Two stage process, eligibility, and assessment of priority via point scoring table. The document provides guidance which covers these processes, changes and updates to the policy, data protection and review of decisions and complaints. The Board provided the comments below:

1. Jon Collen, Huntingdonshire:
   1. Be careful with definitions in the event of any challenges, ensure scenarios are thought through and all eventualities are covered in the policy, e.g. overcrowding policy, who can live in a one bed property, etc.
2. Helen Reed, Cambridge City:
   1. Income levels being dealt with separately, but are you looking at different income levels across the sub region? Access to capital, and if people have large savings, would they still be eligible? Has there been a Quality Impact Assessment been carried out? In terms of not wanting to be discriminatory.  
      **Emily answered:** Still to be ironed out, but yes would be relevant to look at different income levels across the sub region. Access to capital, unsure on how to test access to capital and how that is evidenced. Equality impact assessment - pre document to that has been done, not at full document stage yet.   
      Suzanne Hemingway, Chair, suggested an offline conversation with Allocations staff in terms of practical details. Emily will pick up with Charles Clay, Housing Options and Allocations Manager and Julie Fletcher, both of South Cambs.
3. Nigel Howlett, CHS:
   1. People who have carried out ASB in the last 6 years will not be included? Need to be clear what that means.
   2. Equalities, definitions of key workers - why are NHS staff included but not care staff, why are school teachers included but not pre-school teachers. Public sector staff seem to be included, but not other sectors who provide a similar service, could look at that.   
      **Emily answered:** Key worker and close family guidance has been taken from central government guidance but might need small changes.  
      Suzanne Hemingway added that the national definition is out of step with national mood, it has been seen under the Coronavirus pandemic that care workers are key workers, need a broader definition. Care workers are often on low incomes.
   3. Definition of close family, defined as spouse or civil partner, this would disadvantage people who do not have formal relationships like that. Joint applications – the score of the highest applicant will be taken for each listed criteria, potentially unfair for single people who only have one person, whereas if you take the best score for each (of the couple) rather than the best scoring individual in the couple, provides an advantage for couples.  
      **Emily answered:** Criteria for joint applications, perhaps better for a complete points assessment on both of them and to take the average, to not discriminate against single people (Housing Board suggested perhaps highest, or highest need).
4. Peter Campbell, South Cambs:
   1. Point score table – unclear, is that one set of points per section, or several points within a section, needs to be clearer.
   2. Armed forces, point about people who have been discharged in the past twelve months. The guidance elsewhere is that it should include people who have been discharged in the past five years. Would make sense to include that.
   3. There is some good guidance in the code of guidance for allocation of social housing, it makes sense to adopt some of the same definitions.
   4. No need to have the part about children if it is talking about one bedroom properties only.
   5. If you look at capital or equity in general, that might be more useful than excluding people who own part of a house.
   6. Process issue, asking for proof towards the end of the process rather than at the beginning, there is case law about that, the way it affects social housing allocations. if you let people go through the process without asking for the evidence, you are raising their expectations, only to be let down at the end when the information could be checked.
   7. Definition of work is 16 hours. There is also case law where people have put a definition of number of hours worked, which has fallen foul of equality standards, i.e. if you put specific hours in, it disadvantages people with disabilities and women in particular.
   8. Concept of rounding up, why should 6 months and a day count as one year, it is not. Why does it not include complete years, which is much more understandable.
5. Julie Fletcher, South Cambs:
   1. Greater emphasis and weight given to local connection, rather than work. Too much weight on local connection and should be more around employment and where people work, and travel to work. How far away you work rather than what type of work you do. Prioritising in terms of radius and scoring points that way. For example, someone living and working in Cambridge City would score higher than someone working in the City but having to travel a long distance to get to work.
   2. Income limit, have you thought what that might be, and have you given thought to scoring prioritisation in terms of affordability?   
      **Emily answered:** Would make sense to look at national guidance regards shared ownership - currently £80k which seems very high but will reach out to Local Authorities for more details.
6. Cristina Strood, Cambridgeshire Police:
   1. Section on high risk offenders, is that being looked at as a complete exclusion? Perhaps discuss that with the National Probation Service in terms of checks and balances and managing risks.
   2. Victims of domestic abuse, is there any particular links there too?
7. Heather Wood, South Cambs:
   1. Definition of key workers above, agree.
   2. Points about high risk offenders, how would that be developed and who are you planning to work with?
   3. Reviews and appeals, need to get that right, put a lot of thought into it, and have as robust a process as possible. What are the plans for that, and can people get a chance to comment on it? As it would be a well-used part of the policy, potentially.
8. Dan Horn, Fenland:
   1. Criteria, and inability to afford the open market ownership, and maximum income limit. Length of time on list, circumstances could change during that time.   
      **Emily answered:** Partially why we have asked for evidence nearer to the end. Getting evidence, as close to the property being completed, as possible.