

**Cambridgeshire and West Suffolk Home-Link partnership**

**Note for Regional Housing Board - Lettings Policy Update**

**Introduction**

The Cambridgeshire and West Suffolk Home-Link Partnership has undertaken a full review of the Lettings Policy. The last major policy review and consultation took place in 2012. Some minor policy amendments were approved in 2018 to incorporate changes in legislation relating to the Homeless Reduction Act and also to ensure compliance with GDPR regulations.

The 2020 review was undertaken by a group of housing staff from local authorities and RSLs across the Home-Link partnership. They have looked through the policy line by line and discussed whether the aims of the policy remain relevant and whether the policy continues to meet its stated objectives. This includes detailed discussion around the employment related local connection criteria and the current system of banding.

The review found that the objectives remain relevant and appropriate and that, subject to minor amendments, the revised policy is able to continue meeting these objectives.  Therefore, the overall policy remains largely unchanged, although there are some minor wording changes to aid clarification, some changes to incorporate legislative updates and greater detail in relation to the employment criteria. Further detail on these amendments and points of clarification which are set out below.

**Purpose of the Lettings Policy**

The overall aims of the policy remain unchanged and seek:

1. To meet the legal requirements for the allocation of social housing as set out in the Housing Act 1996 (as amended);
2. To assist applicants in the highest assessed need;
3. To let properties in a fair and transparent way and provide a consistent lettings process;
4. To make best use of housing stock;
5. To ensure that applicants are not unlawfully discriminated against, whether directly or indirectly;
6. To support vulnerable applicants;
7. To provide increased choice and information to applicants;
8. To provide information and feedback on homes that are let through the Home-Link scheme;
9. To improve mobility across the Cambridgeshire and West Suffolk; and
10. To promote social inclusion and help achieve sustainable communities.

As at 31st March 2020 there were 13,271 households registered and waiting for social housing in the Cambridgeshire and West Suffolk Sub-Region.

The draft policy explains who can apply for social housing, the criteria used to prioritise and assess applications and how these properties are nominated.

The policy must comply with the requirements outlined in Part 6 of the 1996 Housing Act. This includes offering ‘reasonable preference’ to certain categories of people when allocating properties and these legal requirements therefore cannot be changed.

**What is changing?**

The majority of the changes to the policy relate to wording changes to make it clearer what the policy actually means and to ensure it is applied consistently across partners. In addition, the policy incorporates changes to the definition of local connection and sets out greater clarity as to what is meant in relation to employment requirements.

However, some changes to the banding criteria were agreed in 2018 in response to the Homeless Reduction Act. Limited consultation took place on the understanding that the amendments would be reviewed and more widely consulted on as part of the 2020 full policy review. Priority bands have been considered in detail and no substantial changes have been made to the 2018 amendments as partners believe them to work as effectively as possible.

**The main changes under consideration are:**

* **Armed Forces - Ex Partners/Spouses**

We propose to give ex-partners/spouses of armed forces personnel the same priority we give their former partners where they must move out of a Ministry of Defence property due to a relationship breakdown. This change is to ensure the partnership is compliant with the requirements of the Military Covenant. Section 2.4 of the Lettings Policy refers.

* **Multiple Applications**

We have clarified the wording around multiple applications to explain that an applicant can have only one active application on the housing register at any time where they are the applicant or joint applicant. However, they may be considered on other applications where they are eligible to be considered as part of another applicant’s household, for example where living with a parent and included as part of their application). Section 2.5.1 of the Lettings Policy refers.

* **Local connection and work requirements:**

The work requirement has changed to clarify the criteria about the type and nature of qualifying work, including where the work is located.

These changes are detailed in Section 3.4.2.

* **Banding**

Changes to the banding elements of the policy were introduced in 2018 in relation to the Homeless Reduction Act. The 2018 changes reflected the fact that new Homeless Prevention and Homeless Relief duties were introduced and needed to be incorporated into the Lettings Policy.

However, the amendments did not change the fundamental principles of the policy. In particular, the partnership continue to agree that it is a fairer and better use of scarce housing resource to provide a higher priority to those who are owed a main homeless duty rather than those whose housing options were still being explored and assessed at the Prevention and Relief stages.

The 2020 review does not seek to change the existing principles but seeks to further clarify some of the wording introduced in 2018.

In addition, we have further clarified the wording to make it clear that, where a person is owed a homeless prevention or homeless relief duty and is placed in temporary accommodation, they will be awarded a Band B but no additional priority for accommodation related factors.

Further detail on the banding criteria is set out in Section 4, particularly in parts 4.7 and 4.8.

The revised policy also offers greater clarity in circumstances where an applicant has sufficient financial capital or other means to find a housing solution outside of the register. The revised wording makes it clearer that, in this situation, an assessment of ‘sufficient financial means’ will override the needs assessment band but is subject to review if an applicant’s circumstances change.

**Consultation and feedback**

The policy has received external legal scrutiny. Overall the partnership received good feedback in relation to the draft and some minor wording changes were also suggested. These have been discussed by Home-Link Management Board and incorporated into the final draft in readiness for consultation.

Advice has been sought in relation to the appropriate length and breadth of the consultation. In response to this an eight week consultation will commence on 23rd October 2020 and end on 18th December 2020. South Cambridgeshire District Council will host the survey on behalf of all partners, but each partner will be responsible for arranging local publicity and briefing members.

As part of the consultation respondents will have the opportunity to comment on the policy objectives as well as the specific changes that have been proposed.

Home-Link Management Board will meet in January 2021 to approve a final version of the policy, incorporating any pertinent points from the consultation period. Regional Housing Board are invited to respond to the consultation and to indicate any further updates that are required.

**Heather Wood, Chair of Home-Link Management Board, October 2020**