

ROTHERHAM BOROUGH COUNCIL – REPORT TO MEMBERS

1.	Meeting	The Cabinet
2.	Date	18th December 2013
3.	Title	Revision of RMBC's Council Housing Allocations Policy
4.	Directorate	Neighbourhoods and Adult Services

5. Summary

RMBC's Allocations Policy was last substantially amended in January 2010, and it now needs to be revised again to take into account the new flexibilities and opportunities offered to social housing landlords by the Localism Act 2011, and to make the system as fair as possible. We also need to review the Allocation Policy because of the size of the Housing Register, the likelihood it will increase if we do nothing and to take account of the circumstances of local people and firmly base the Policy on addressing housing need.

The proposals contained in the report have been considered by Improving Places Select Commission, Cabinet Member for Safe and Attractive Neighbourhoods, various stakeholders, applicants and staff. The consultation period has spanned over 1 year; the 3 key messages that people told us they would like to see change are:

1. Council houses should be for people in housing need
2. Rotherham Council homes should be for local people
3. Council tenants with breaches in their tenancy shouldn't be given another Council home

A summary of the feedback has been incorporated into Appendix 1 and the draft version of the Allocation Policy (See Appendix 2) now requires approval from Cabinet Member, Cabinet and full Council for formal adoption in June 2014. If the proposed policy is approved we will write to all applicants to explain the changes during March 2014.

6. Recommendations

That Cabinet:

- **AGREES THE AMENDMENTS IN THE ALLOCATION POLICY DETAILED IN SECTIONS 7.2, 7.3 and 7.4**
- **AGREES TO ADOPT THE REVISED ALLOCATION POLICY DETAILED IN APPENDIX 2**

7. Proposals and details

7.1 Reasons for revising the Allocations Policy

The Localism Act 2011 seeks to devolve responsibility back to councils, allowing more decisions about housing to be taken locally. In the case of allocating housing, this means local authority landlords are able to apply locally determined criteria to their housing registers and no longer have to operate open registers, with the expectation from central government that social housing should be offered to those people in housing need.

The Council's Housing Register currently contains 25,314 applicants, and the vast majority of these are adequately housed, placed in the General group and do not currently need a Council house, although they may aspire to live in a Council home in the future. The main problems this causes are as follows:

- It is an expensive and inefficient use of Council resources to provide administration for such a large list
- People with no housing need are allocated social housing, such as owner occupiers or existing tenants who are adequately housed, which means those with a real housing need have to wait longer, causing frustration and anger with the Council
- People who have registered an application for future use and then become in housing need are unwilling to be assessed for a priority group for fear of giving up their General date
- We have an inaccurate picture of need and demand in Rotherham as nearly 20,000 of the people on the register do not bid for properties, and therefore do not currently need a Council home, although they may aspire to live in a Council home in the future
- The number of applicants is likely to increase throughout the recession and beyond, as will the cost of carrying out annual reviews and administration

This report proposes that we change the current Allocations Policy and process in order to address these problems, to take into account the new flexibilities offered in the Localism Act 2011, and to make the system as fair as possible. In order to ensure households who may no longer qualify for social housing in Rotherham, either because they have not lived in the area long enough, or because they cannot demonstrate that they qualify for other reasons, we propose that we operate a housing options approach alongside the housing register. This will include help to access alternative housing in the private rented sector.

The Allocations Policy was last substantially updated in January 2010, with further minor amendments in February 2011, and RMBC's response to a Government Consultation on Allocation of Accommodation was reported to the Overview and Scrutiny Management Board in March 2012.

Consultation

When there is a "major change of policy" on allocations RMBC has a statutory duty to consult other social landlords with whom it places people from its housing register. As the proposed policy is "an entirely new approach to the letting of accommodation" it is clearly a "major change of policy". Section 166A(13) of the Housing Act 1996 (inserted by the Localism Act 2011) states that before adopting an allocation scheme, or making an alteration to their scheme reflecting a major change of policy, a local housing authority in England must:

- (a) send a copy of the draft scheme, or proposed alteration, to every private registered provider of social housing and registered social landlord with which they have nomination arrangements
and
- (b) afford those persons a reasonable opportunity to comment on the proposals.

Therefore on 5th November 2013, a copy of the proposed policy will be sent to every RSL's with properties in Rotherham with whom RMBC places people from its housing register, giving them opportunity to comment by 30th November 2013

To ensure that we involved local residents in the proposed changes we implemented a consultation timetable which captured the views of local communities, elected members, applicants, tenants on the housing register, stakeholders and staff.

The consultation has spanned over 1 year and has been conducted through various methods such as information at roadshows, publishing surveys on the internet, conducting face to face surveys with applicants in the Property Shop and with Rotherham residents at the Rotherham Show, undertaking workshops with staff and elected members, delivering presentations to various stakeholders such as Rotherfed, Rotherham Older People Forum (ROPES) Area Assemblies, and Improving Places Select Commission.

The results have been clearly analysed, and are reflected in proposed changes to the Allocation Policy. See Appendix 1

An Equalities Impact Assessment has also been conducted and consideration of equalities issues has been considered and included into the proposed changes.

Taking the feedback from the consultation and the Equalities Impact Assessment into account each of the proposed changes is set out in 7.2 below.

7.2 Proposed changes

7.2.1 Operate a Local Connection Criteria; A person will qualify to go on the Housing Register if they have a local connection to Rotherham for a minimum of 3 years

The current Allocation Policy allows people who don't live in Rotherham to join the housing register. The vast majority of people who were involved in the consultation agreed that we should change the current policy and have a 3 year local connection rule, and this will ensure we have the same rules as Doncaster. There were concerns that people who couldn't access Doncaster's and other Local Authorities registers would come to Rotherham, which would mean local people in Rotherham having to wait longer. Although there is only Doncaster, in the South Yorkshire sub region who have considered a local connection policy, there are many other Local Authorities with new local connection allocation policies such as Northampton, North Yorkshire, York, Leicester, East Riding, all have varying local connection criteria but none have exceeded 5 years. The Department for Communities and Local Government are also in the process of publishing statutory guidance on social housing allocations and local connection, which will strongly encourage all local authorities to adopt at least a two year residency test as part of the qualification criteria.

The proposed new policy for Rotherham is that a person has a local connection where:

- They have lived for the last 3 years in Rotherham through their own choice.
- They are currently employed in Rotherham and have been for the last 3 years
- They have direct family who live in Rotherham and they have done so for the last three years. Direct family members include spouses, civil partners, parents, sons, daughters, brother and sisters.

The three year residence rule will not take account of time spent resident in the borough where applicants have been rehoused in temporary accommodation in Rotherham by another Local Authority in a bail hostel or other such accommodation, detained in the district under the Mental Health Act, receiving specialist hospital treatment, in occupation of a mobile home, caravan or motor caravan which is not placed on a residential site, in occupation of a holiday letting this includes a permanent building, hotel or bed and breakfast accommodation for the purposes of a holiday

The proposal is that there will be cases that will be exempt from the Local Connection Criteria, these are:

- Members of the Armed Forces and former personnel where the application is made within 5 years of discharge
- Bereaved spouses and civil partners of members of the Armed Forces leaving service family accommodation following the death of their spouse/partner.
- Relationship breakdown and divorcees of members of the Armed Forces where the application is made within 6 months from date of separation
- Serving or former members of the Armed Forces who need to move in urgent circumstances because of serious injury, medical condition or disability sustained as a result of their service irrespective of when this was.
- Homeless applicants accepted as owing a duty as defined in Part VII of the Housing Act 1996
- Applicants considered via the Witness Protection Scheme as agreed by the Housing Options Manager

7.2.2 Operate wider qualifying criteria. This will mean some applicants won't be accepted onto the Housing Register and some households will be removed from the current Housing Register who are currently in the General group.

Currently because of the way the policy works there are various examples of properties that have been let to applicants in the General group with no housing need in preference to those who have been in greater need.

The pressure on Council and other affordable housing in Rotherham has never been greater, and the Council is responsible for helping those who are in the greatest need. There is a view that it is no longer possible or appropriate to allow people to move in to a Council house purely based on how long they have been waiting, if they have no actual need for Council housing. One of the possible approaches is to remove this group altogether from the housing register to ensure the register reflects current housing need, and not overall general demand / aspirations. We will move people who are in housing need from the General group into an appropriate 'current need' housing group.

The people who were consulted preferred this approach.

We therefore propose that in the new policy the following applicants won't qualify to join the housing register in the future and also we propose to cancel/close the following households in the current General group:

- Households living with family/friends/dependants who do not currently want to move home but have registered just in case they need to move in the future
- Households who are living in private rented homes who do not currently want to move home but have registered just in case they need to move in the future.
- Households subject to a relationship breakdown who no longer need to move home.
- Applicants who have previously been evicted from a Council or Housing Association secure tenancy in the last 5 years due to breaches of their tenancy conditions
- Current and Former Council Transfers with tenancy breaches that in the opinion of Council, affects the applicants suitability to be a tenant
- Home owners with no medical needs
- Households with savings over £16,000 with no housing need.
- Service Sector tenants living in tied accommodation, they will be able to re-apply and be considered in Band One when their employment ends and require alternative housing
- Applicants who live outside of the Borough with no local connection to Rotherham as per local connection criteria (See Section 2.2 of the Allocation Policy)

Of the 25,314 applicants on the Housing Register (in February 2013), approximately 19,000 are in the 'General' group. The vast majority of people in the General Group never bid, as there is a historical culture in Rotherham that people should put their name down in case they need a house in the future as their waiting time will qualify. Anecdotally, the types of circumstances of some people who are in the General category:

- People who are adequately housed, but expect to want a Council bungalow when they are older
- People who already own a home now but may wish to sell or rent this out and move into a Council house in the future. At the moment home owners of all age groups can bid on any property.
- Service tenants who live in tied accommodation who registers for the future when their employment ends
- People who feel that a Council house would be a good safety net in case their situation changes in the future e.g. if they lose their job
- People who are existing Council tenants who are adequately housed in the right size property with no medical need to move, but who aspire to move

Currently of the people in the General group who do bid, many are in some form of housing need, for example people living with family or friends who need to move on, or dependents who are ready to take on a tenancy, or people who have suffered a relationship breakdown. These people are often reluctant to move to a priority group due to the concept that their waiting time will enable them to get a Council home quicker.

Any changes to the Allocation Policy must be transparent and be communicated effectively and clearly.

We propose to write to all General group applicants to explain:

- The reasons why we are taking these actions
- That unless we hear from them within a certain time frame their application will be closed/ cancelled
- That if they do currently need to move to a Council home, they should contact Key Choices to update their circumstances. Their application will be changed to the relevant group and dated to reflect the date their circumstances changed and they will have a much better chance of getting a Council home as 90% of properties are made available to categories within the Register of Housing Need.

The recommended approach is to ensure the register contains households in housing need. However in some cases where there are households in housing need but have not made bids, these will be considered and re-dated to when their circumstances changed. (Possibly due to the fact that some applicants may have considered making a bid but were put off because of their lengthy queue position).

The preferred method as opposed to cancelling ineligible housing applications is to close the live application on the Abrisas ICT system. This means that the application will be removed from the Housing Register and won't be included in any statistic but the application is held on file. This can then be easily resurrected if the applicant later approaches in housing need (they will also retain the same application number) If the application is cancelled and the customer re-approaches then they will need to complete a full new application as their details will have been removed from the system. Housing Options will be provided to those households who do not qualify, for example advise to access accommodation in the private rented sector or home ownership.

7.2.3 Create a Transfer Register by moving the applications from Council tenants with no tenancy breaches in the last 2 years from the current General group into a Transfer Register

A Transfer Register will only contain applications from Council tenants with no housing need wanting to transfer to another Council home.

Currently Council tenants with tenancy breaches are allowed to transfer to another Council home, any unauthorised repairs are subsequently recharged to this tenant. Overwhelmingly the majority of people who were involved in the consultation agreed that Council tenants who have any breaches in their tenancy condition should not be allowed to transfer to another Council house, but thought that we should reward the good tenants and allow them to move. This supports the existing Local Lettings Policy for new build homes, where preference is given to existing Council tenants with a good tenancy record for the last 2 years. Council tenants in housing need eg people wanting to downsize due to bedroom tax, or people with medical issues where their current property isn't suitable will be placed in one the priority groups

7.2.4 Create a Register of Housing Need with 3 groups

The current Register contains over 25,000 applicants, the vast majority of whom do not need a Council house at present. By creating separate groups we can have a clear picture of who is in housing need, and which applicants would like a home in the future. When quoting housing need figures, we will quote the number of people on the Register, which we anticipate would be under 10,000 under the new proposed system.

The proposed 3 new groups to the Register of Housing Need as follows:

- **Current Priority Plus group rename to Band One or High Need**
- **Current Priority group rename to Band Two or Medium Need,**
- **Merge the current General Plus and General groups and rename to Band Three or Low Need**

We currently maintain an open Housing Register and anybody can apply for a Council house. Once an application is received the person is awarded into one of categories:

Current Need Category	Definition
Priority Plus (P+)	Households who require immediate housing and are considered for all vacant Council properties
Priority (P)	People who experience urgent housing need and require moving due to specific circumstances
General Plus (G+)	Applicants who are entitled to reasonable preference on a non-urgent basis
General (G)	Applicants who have no reasonable preference entitlement/priority need

The names of the categories are not as clear and descriptive as they could be. Use of the term 'priority' suggests the Council sees some groups of people as having more importance than others. It would be more logical and simpler to define the categories into Bands 1 to 3 and have a Transfer band to reward good Council tenants with no tenancy breaches

7.3 Make changes to the advertised quota

7.3.1 Advertising Quota – The proposal is to retain the current rule that all vacant dwelling are offered to Band One (previously Priority Plus) ahead of other bands, retain the percentage of properties advertised to Band Two 50% (previously known as Priority group), but include a quota in Band Three of 40% (previously General Plus and General) and include a new proposed Transfer Band with a 10%. quota

Currently the Council operates a choice-based lettings (CBL) system. All vacant properties are advertised in the Key Choices Letting Scheme; 50% of properties are advertised as giving preference to bidders from the 'Priority' Group and 50% to the combined General groups (30% General Plus and 20% General). This is computer generated to ensure a fair distribution of properties between the categories. Any applicant can bid for any property – and the property will be offered to the person in the appropriate group with the longest waiting time. Households in the Priority Plus Group require immediate housing, and will be considered first for all properties, ahead of any other group.

The proposed change would increase the number of properties that are currently allocated to people in Band Three in housing need. The reason why this quota has been increased as opposed to Band Two is due to the fact that we have merged together a large volume of applicants from the General Plus and the people in housing need from the General Band which means that Band Three will contain an extremely high volume of applications in housing need compared to less applications in Band Two. However it is recommended that the quotas are reviewed annually, see table below.

Old group	Old quota	New Band	New quota
Priority Plus	100%	Band One	100%
Priority	50%	Band Two	50%
General Plus	30%	Merged to Band Three	40%
General	20%		
		Separate Transfer Band	10%

The bidding process will remain unchanged, where all applicants can bid for any advertised group, and where there are multiple bidders within a group, preference will be given according to length of waiting time.

The properties will continue to be offered on a quota basis, which will assist in creating sustainable and balanced communities. It will also ensure that those people living in unsuitable housing, which include children living in flats, non-statutory homeless households etc are able to access Council housing. If the properties were not advertised on a quota basis and were only allocated to Urgent group people first ahead of others, those in the Unsuitably Housed group would have very little opportunity to access Council housing as they would always be placed last in the shortlists.

The properties will initially be offered to the Band One, and then to the advertised group, where there are no suitable bidders from band 1, the next group in the sequence will be selected and so on. Properties will be advertised and the shortlist will be sorted as follows:

Advertised to Band Two (50%): Band One, Band Two, then Band Three, then Transfers

Advertised to Band Three (40%): Band One, Band Three then Transfer Band

If it is decided that 10% of properties should be advertised to Transfers, the process would be:

Advertised to Transfer (10%): Band One, then Transfers, then Band Two, then Band Three

7.4 Within the Register of Housing Need categories, make the following amendments:

7.4.1 The proposal is to re-date the following households currently in the General group who have made a bid in the last 12 months to the date the household became in housing need (which should coincide with the earliest bidding date) and place in the appropriate band:

Existing	New Band
Priority Plus	Retain all applications and rename to Band One

Priority	Retain all applications and rename to Band Two
General Plus	Retain all applications and merge to Band Three
General	Remove some applications and merge the remaining applications to Band Three
General	Retain Council tenants in the current general group with no tenancy breaches in last 2 years and move to the new Transfer Band

Move and re-date the following categories from the General group as follows:

Move to Band Three

- Households living with family / friends / dependants, and who are ready to live independently but cannot afford other housing options such as private rented or owner occupation,
- Households who are subject to a relationship breakdown
- Households living in private rented homes but are struggling to afford the rent, this would be determined by affordability checks analysing income and expenditure.

Move to Band Two

- Households with medical need who choose to stay in the general group
- Homeless households who choose to stay in the general group

Move to the Transfer Band

- Council tenants with no tenancy breaches in the last 2 years.

Any other household currently in the general group in housing need will be moved to the appropriate Band.

The recommended approach is to re-date the applications to reflect the date when they became in housing need, this will ensure all applications in Band Three or the transfer Band have no long standing housing register dates. However in some cases where there are households in housing need but have not made bids, these will be considered and re-dated to when their circumstances changed. (Possibly due to the fact that some applicants may have considered making a bid but were put off because of their lengthy queue position)

7.4.3 Add Armed Forces provision into Band One

The Localism Act 2011, Regulation 2 amends section 166A(3) of the Housing Act so that local housing authorities in England must frame their Allocation Scheme to give additional preference to Members of the Armed Forces personnel and their partners in urgent housing need who were / are serving in the regular Forces at any time preceding their application. This also applies to bereaved spouses or civil partners where they cease to be entitled to occupy Ministry of Defence accommodation.

It is proposed that Emergency status in the current Allocation Policy be applied to those serving in the regular forces and is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person's service, and Former Members of the Armed Forces and bereaved spouses or civil partners in Urgent Housing Need. This will be applied to partners and spouses if they have recently ceased, or will cease to be entitled, to reside in accommodation provided by the Ministry of Defence following the death of that person's spouse or civil partner who has served in the regular forces.

7.4.4 Review applications with rent arrears and cumulative debt as per the Council's Rent Policy

A new rent arrears policy is being developed separately. This will apply to applicants with cumulative outstanding debt to the Council, Housing Associations or Private Landlords that are based in Rotherham. Outstanding debt will include rechargeable repairs/ damages, rent in advance loans, furnished or district heating charges, and money owed to Key Choices Property Management. The proposed new policy for allocation is for the policy eligibility rules to change from the current provision that applicants will be eligible to move following 13 weeks consecutive payments of a minimum of £2.50 per week to reducing the total debt by 25%

7.4.5 Make changes to policy and procedures in order to more effectively manage the Housing Register and encourage behaviour change:

7.4.6 Once an applicant has refused two offers their application should be cancelled

Under the current policy, the bidder with the longest waiting time within the specified category will be offered the property. If the person accepts the offer they move in and their details are removed from the Housing Register. If they refuse the offer, the property is offered to the person with the second longest waiting time and so on. If a person refuses the offer of a property they have bid on they are allowed to remain in the category and bid for further properties.

Under the new proposals once an applicant has refused two offers their application would be cancelled. The main reason for this proposed change is to prevent people from repeatedly bidding for properties they are not seriously interested in (thus reducing the administrative burden), and to ensure that only people who are in genuine housing need can remain on the Register of Housing Need.

7.4.7 Once a person has decided and agreed to have major adaptations work that meet their long-term needs their application should be cancelled.

The main reason for this proposed change is to prevent people who have requested and have been assessed for major adaptation work that meet their long-term needs and then utilise their live application to move following the installation of major adaptations, most of which have incurred costs to the Council of over £1000. It is proposed that during the application for adaptations the customer is advised of their housing options, one of which is to transfer to an adapted home or where the customer prefers to remain in their own home and have the adaptations fitted that meet their long-term needs that any previous housing application should be cancelled. Where adaptations are fitted to assist the household with daily living, pending a move, the application will remain live.

7.4.8 Once an application has been cancelled for any reason, the applicant should not be allowed to re-enter the Housing Register for 24 months, unless their circumstances change

The current Allocation Policy sets out circumstances when an application will be cancelled, for example where a tenant has been evicted, where an applicant is granted a new tenancy by the Council, or where a tenant has accepted a mutual exchange. When a person is evicted for breach of tenancy conditions, their live application is cancelled, but they can apply to re-register a new application immediately. Some people who have committed serious breaches are excluded from registration for a set period of time, others are allowed to re-register.

Under the new proposals once an application has been cancelled for any reason, the applicant would not be allowed to re-enter the Housing Register for 24 months, unless their circumstances change. The reasons for this proposed change are that it will:

- Ensure consistency
- Prevent people who have been evicted from a tenancy from repeatedly moving around

- Reduce void and administration costs
- Restrict new tenants from registering an application within the first 24 months of their new tenancy
- Assist in creating settled communities and improving community cohesion within estates.

We will ensure officers use their discretion in cases where people's circumstances change.

7.4.9 Once an applicant that has been accepted as statutory homeless refuses one suitable private sector offer, or one Council or RSL offer, they will be moved down to the Band Three. On acceptance of a private rented offer their application should be cancelled.

The Council now has the power (through the Localism Act 2011) to discharge its statutory duty to homeless people by making an offer of a suitable *private sector* property. Implementing this change will ensure that homeless applicant have broadly similar opportunities to other applicants.

A private rented sector offer made under homelessness legislation is intended for a long term settled move. In order to discharge the homelessness duty the private rented sector offer has to be on a 12 months tenancy. This means that both the landlord and tenant have made a commitment for a 12 month period. If the housing application wasn't cancelled when rehoused the tenant could move before the 12 month period ended and they would still be liable for rent payments to the Private Landlord. Even though the application is cancelled the person will be protected for 2 years if they become homeless as the Council will have a duty to offer alternative housing under homelessness legislation, irrespective of whether they are in priority need as long as they didn't become homeless intentionally.

7.4.10 Encourage all new tenants to sign a direct debit or standing order form to pay their rent, and have the right not to offer a property to customers who cannot afford to take on a tenancy.

When Universal Credit is implemented tenants will receive all their benefit payment via a bank account. The direct debit or standing order for rent payments will not only facilitate easier payment methods for the customers but will also reduce the risk of uncollected rent.

Currently applicants are provided with advice and information regarding affordability at the "Its Your Move" meeting. To avoid people who cannot clearly afford to take on a tenancy the affordability check will be undertaken earlier in the process for example when the applicant first registers. If an affordability check determines that a customer would struggle to afford the tenancy, the officer would try to encourage the applicant to re-consider and wait until their circumstances change. However if the applicant insists that they can afford the tenancy and wishes to take it on there is no provision in the current Allocation Policy for officers to refuse to make an offer on that basis.

Unless we find new more efficient ways to collect rent, there is a possibility that using existing rent collection ratios there would be a need for over 30 additional rents staff to allow for the effects of Universal Credit.

7.4.11. Following the initial mail-out, stop all annual reviews as the resources spent on this costly administration would be better deployed on advice services to people on the full range of housing options in Rotherham

This was recommended by the people who were consulted.

7.5 Next steps

- Send a copy of the proposed policy to every RSL's with properties in Rotherham , giving them opportunity to comment. (Send out 5th November 13, comments back by 30th November 13)
- Submit the final report (with revised Allocations Policy appended) for formal sign-off, to Cabinet and Full Council in December 2013/January 2014

- Produce a new Summary Guide to the Allocation Policy in February/March 2014
- Make changes to the ICT – which will take 5 to 6 months
- Write to all people on the Housing Register within one month of formal approval for adoption to notify them of the new policy which will commence in mid to late summer.

8. Finance

Implementation of the changes proposed in this report will help us to house homeless people more expediently and therefore reduce the cost to the Council of temporary accommodation.

It currently costs the Council approximately £10K per annum to send out annual letters to people in the General housing group, i.e. those who do not currently require housing. This would be straightforward revenue saving if we stop providing administration to people who are not currently in housing need.

Although the removal of administration for the General group will result in some internal changes to staff workloads this will not have an impact on staffing budgets but will enable the service to adequately deal with the increase in demand for support and advice currently being experienced.

Following the completion of the revised Allocation Policy, a summary booklet will be amended and issued to existing and new applicants. This will incur a one-off cost of around £1.20 per applicant, which includes postage.

Most of the changes needed to the ICT system can be undertaken in-house at no extra cost, however there may be some more complex changes required which will incur a cost of £140 per day. This is envisaged to take no more than 5 days. The costs will cover amendments to the Housing Register and choice based letting module rules which ensure applicants are placed in the correct bidding queue position.

Changes to the Allocations Policy will need to be effectively communicated to staff. This training will be undertaken in-house by the Housing Options Manager.

9. Risks and uncertainties

Risk 1: If we continue to operate a single, open Housing Register with the General group being able to access 20% of all properties, the number of applicants is likely to balloon, and to the detriment of families who are struggling to find a decent home at an affordable rent level. Rotherham may also see an increase in applications from residents of neighbouring local authority areas who are considering applying local connection criteria to their housing registers. By making the changes proposed in this report we will effectively manage people's expectations, without excluding anyone from the register.

Risk 2: The main risk associated with reducing the number of properties we make available to people in the General group is that of increased dissatisfaction with the Council, but we will mitigate this by ensuring a careful and robust communication strategy.

Risk 3: Rotherham has a strong focus on encouraging and supporting sustainable communities and by reducing the percentage of properties that go to people who do not need rehousing, and are not bidding, this may lead to a greater number of tenancies being issued to households who are in need of housing. However, it should be noted that households in housing need are not always deemed to be vulnerable people, and the proposed changes do still ensure that a proportion of properties go to the Unsuitably Housed (and possibly General) groups, enabling us to continue to achieve a degree of balance.

10. Policy and Performance Agenda Implications

Ensuring the Council's Housing Allocation Policy is as fair as possible will contribute to two of the priorities of Rotherham Partnership's Community Strategy: *Ensure the best start in life for children and families*, and *Support those that are vulnerable within our communities*.

It also contributes to four of the ten commitments within our new Housing Strategy:

- Commitment 1: We will deliver Council housing that meets people's needs
- Commitment 2: We will increase and improve the supply of affordable rented housing
- Commitment 6: We will help people to access the support they need
- Commitment 7: We will help people in Rotherham's most disadvantaged communities

11. Background papers and consultation

Background papers

- RMBC's Housing Allocations Policy, December 2008 (updated February 2011)
- RMBC's Response to Government Consultations; Allocation of Accommodation and Social Housing Fraud, Overview and Scrutiny Management Board, 23rd March 2012
- Laying the Foundations: A Housing Strategy for England. CLG, November 2011
- Localism Act 2011
- Discharge of Homelessness Statutory Duty, Cabinet, 18 July 2012

Consultation

Consultation was carried out during summer 2012 as part of the wider housing strategy consultation, and a consultation timetable has been implemented during 2013. We recorded a diverse range of opinions – initially some thought we should continue to maintain an open Housing Register, however more recently the majority of people thought we should prioritise Council housing for those in need.

Once the proposed changes have been agreed we will implement a robust communication strategy to ensure all housing applicants are aware of the changes and how they will benefit.

12. Contact details

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