

## Introduction

This paper is a summary of the responses received during the consultation period Wednesday 2nd January to Tuesday 26th March 2013.

The responses have been collated by the Housing Strategy & Enabling Officer, Cheltenham Borough Council on behalf of the local authorities in Gloucestershire.

Letters were sent to housing waiting list applicants and registered providers who are Gloucestershire Homeseeker partners, explaining the changes to the Gloucestershire Homeseeker Allocations Policy as a result of the Welfare Reform Act and the Localism Act.

A copy of the letter can be found in Appendix A in this document

A copy of the proposed changes can be found in Appendix B in this document

All responses are listed in Appendix C in this document.

## Responses

The responses in this paper are that of 42 individuals and 1 registered provider [who stated that they have no comments on the changes] from across the Gloucestershire authorities.

The responses from the 42 individuals is summarised below in table 1:

Table 1: Summary

<b>Response Type</b>	<b>Number</b>
No comment	8
Agree with all changes	6
Other	28

Overleaf, table 2 sets out the proposed changes alongside the number of respondents who agreed or disagreed in some way to that change and commentary about the concerns of respondents.

Table 2: Number of comments/concerns against each proposed change

	Name of change	Disagree with particular changes/ negative response/ concern expressed	Agree with particular changes/ positive response	Main points	Policy Amended/not amended
1	Bedroom eligibility	10	0	The greatest concerns were that of bedroom entitlement, mostly for children but also need for carers and couples who may in future wish to have separate bedrooms.	This change brings the policy into line with the changes introduced to the Benefit rules under the Welfare Reform Act. As a result, the proposed change to the Policy will ensure that tenants who secure a property do not then subsequently find the property to be unaffordable.  The Policy has NOT been amended as a result of the comments
2	Visiting children	7	1	Respondents who were negative about this change were those who were in small [bedsits] accommodation who were concerned about not having a property big enough to have their child/ren to stay - "part-time care" and for children to have access to both parents.	This change brings the policy into line with the changes introduced to the Benefit rules under the Welfare Reform Act. As a result, the proposed change to the Policy will ensure that tenants who secure a property do not then subsequently find the property to be unaffordable.  The Policy has NOT been amended as a result of the comments.
3	Owner occupiers	3	3	Some support but respondents were concerned about how this will affect families, separated families and people are in negative equity.	Owner occupiers will not be offered social housing except where there is a proven social or medical need that they are not able to resolve through the sale or adaptation of their own property.  The Policy has NOT been amended as a result of the comments.

4	Armed Forces	1	3	One respondent felt that there was not enough detail to comment fully on this change.	<p>This change brings the policy into line with the Allocation of Accommodation: Guidance for Local Housing Authorities in England July 2012 which sets out specific proposals concerning ex-service personnel.</p> <p>The Policy has NOT been amended as a result of the comments.</p>
5	Armed Forces discharge	6	3	Respondents questioned why [immediate] discharge was part of the criteria and how appropriate was local connection to this criteria also.	<p>This change brings the policy into line with the Allocation of Accommodation: Guidance for Local Housing Authorities in England July 2012 which sets out specific proposals concerning ex-service personnel.</p> <p>The Policy has NOT been amended as a result of the comments.</p>
6	Foster carers	2	0	Concern for foster carers in social housing	<p>This change brings the policy into line with the changes introduced to the Benefit rules under the Welfare Reform Act. As a result, the proposed change to the Policy will ensure that foster carers will be awarded an extra bedroom.</p> <p>The Policy has NOT been amended as a result of the comments</p>
7	Carers	4	2	Many respondents requested to more about the assessment and what would be required.	<p>This change brings the policy into line with the changes introduced to the Benefit rules under the Welfare Reform Act. It is therefore proposed to change the policy relating to bedroom need in line with Housing Benefit calculations.</p> <p>The Policy has NOT been amended as a result of the comments.</p>

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8	Multiple column criteria	4	0	Many respondents were unclear on the proposals and questions asked.	Criteria removed following recent case law allowing authorities discretion to remove. The Policy has NOT been amended as a result of the comments.
9	Social housing transfers	1	1	One respondent agreed with this change based on case-by-case assessments with another concerned about how a household would be deemed unable to afford their property.	This change brings the policy into line with the changes introduced to the Benefit rules under the Welfare Reform Act. Where a social housing tenant's rent is proven to be unaffordable due to under occupation deductions for those receiving housing benefit introduced from 1 <sup>st</sup> April'13.  The Policy has NOT been amended as a result of the comments.
10	Eligibility	5	0	There was negative feeling around the change in that respondents felt this should be being done anyway.	This is current practice for Gloucester City. All applications need to be checked for eligibility on application to ensure correct housing need banding applied.  The Policy has NOT been amended as a result of the comments.
11	History of ASB or rent arrears	3	5	A strong response to ASB and rent arrears and respondents wanting complete exclusion from Gloucestershire Homeseeker in some cases. One respondent wanted to understand however, how long the non-qualifying period would be.	This change brings the policy into line with the Allocation of Accommodation: Guidance for Local Housing Authorities in England July 2012.  The Policy has NOT been amended as a result of the comments.
12	Maximum income	6	2	Several comments relating to the need for social housing if a household has a joint income of £60k suggesting it should be reduced.	An applicant will not be accepted for social housing where their financial resources are sufficient to resolve their housing need in the district of choice. This will be determined on an individual basis.

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					The Policy has been amended as a result of the comments
13	Homelessness	1	4	Support for using the private sector to house [families] in emergency/homelessness need.	<p>The Homelessness (suitability of accommodation) England Order 2012, Section 148 &amp; 149 of the Localism Act 2011, came into force on the 9<sup>th</sup> November 2012; local authorities now have the power to end the main homelessness duty with a private rented sector offer with or without the applicant's consent.</p> <p>The Policy has been amended as a result of the comments</p>
	<b>Total</b>	<b>53</b>	<b>24</b>		

**Appendix a – Letter to applicants**

2nd January 2013

Dear

We are writing to you to explain the changes that we are proposing to make to the Gloucestershire Homeseeker Policy as a result of the Welfare Reform Act and the Localism Act. We have also made a few changes to simplify the banding table and make it easier to understand. The full policy will be updated on the web site once the consultation period has ended and the changes have been approved by the 6 partner local authorities. The IT system will then have to be upgraded and tested. We expect to be ready to start using the new policy in the Summer 2013.

We are asking you to read through the changes on the 2nd page of this letter and if you have any comments to either write them in the boxes and post that page back to us (at the address overleaf) or visit the Gloucestershire Homeseeker website and follow the consultation link on the homepage, in order to leave your comments electronically. The website address is [www.gloshomeseeker.co.uk](http://www.gloshomeseeker.co.uk). The banding table has also been updated and shows how priority will be awarded in the revised policy.

The consultation period is running from Wednesday 2nd January 2013 for 12 weeks and so will close at the end of Tuesday 26th March 2013, so all comments need to be received by then.

Please return your form to:

We would also like to make you aware of a new service Glos Homeseeker is now providing: the ability to view properties & place your bids through your TV. The service is called DigiTV and all the information about how to use the service can be found on our website. If you do not have access to the Internet, you can visit one of the free for public use PCs around the County (at most libraries and all Council Offices) or call your local Housing Options team who will be happy to talk you through the steps.

Yours sincerely

## Appendix B – Proposed changes to Gloucestershire Homeseeker Allocations Policy

1. Bedroom Eligibility – We propose to change the ages for bedroom eligibility from 8 and 18 to 10 and 16.
2. Visiting Children – we are proposing to remove the following section: Where an applicant has part-time access to a dependent child or children and seeks an additional bedroom, consideration will be given to the individual circumstances. This may include whether there is a court order or formal custody agreement, whether the applicant is the payee for child benefit payments, the number of children and if the children stay with the applicant for 50% or more of the week.
3. Owner Occupiers will not be offered social housing except where there is a proven social or medical need that they are not able to solve through the sale or adaptation of their own property
4. Armed Forces – Local Connection will be given to the following:
  - Those who are currently serving in the regular forces or who were serving in the regular forces at any time in the five years preceding their application for an allocation of social housing
  - Bereaved spouses or civil partners of those serving in the regular forces where (i) the bereaved spouse or civil partner has recently ceased, or will cease to be entitled, to reside in Ministry of Defence accommodation following the death of the their service spouse or civil partner, and (ii) the death was wholly or partly attributable to their service.
  - Existing or former members of the reserve forces who are suffering from a serious injury, illness, or disability which is wholly or partly attributable to their service
5. On discharge members of the Armed Forces with Priority need, will be Gold band for 6 months from Discharge date. Those with Non Priority Need will be given Silver from Discharge date. If it is an immediate discharge then they will be getting the priority for a shorter time.  
Repeat application up to 5 years from discharge - Priority Need or Unintentional Homeless applicants will get Gold band again for 6 months from Notice being received and Non Priority Need or Intentional Homeless will get Silver priority backdated for 6 months from Notice being received.
6. Foster Carers – Once their application has been approved by the Foster Panel we will consider their extra bedroom requirements on a case by case basis.
7. Carers - We will award the extra bedroom once they have been assessed.
8. Multiple Criteria Column – This is the last column on the band table (overleaf) and we will be removing this from the table completely.
9. Transfers of existing social housing tenants who are Suspended because of rent arrears will be considered as an exception on an individual basis if demonstrable that they cannot afford to stay in their current tenancy as a result of the Welfare Reform Act changes.
10. Eligibility to be on the Housing Register will be checked at point of application and again before any offer is made in case eligibility has been lost in the intervening period.
11. Those with a significant history of Anti-Social Behaviour or Rent Arrears will be non qualifying instead of being Suspended.

12. Those with a combined gross income above £60k will be non-qualifying. This figure will change in line with current rules for Home buy/low cost ownership options
13. Homelessness -Local Authorities are now allowed to discharge duty into the private sector so Gloucestershire Homeseeker policy wording will be updated to reflect this position.



**Appendix C – All responses**

No Comments
No Comments will wait to hear where are
Agree with all changes
Agree with all changes
Bedroom Eligibility-unfair as girls start puberty very early. Multiple need what happens if in band? Checking eligibility at point of entry-should be done already. Combined gross income above £60,000-why would you need social housing if you earn this amount of money?
Visiting children should not be allowed a bedroom. Armed forces should only be given preference if homeless, not if they have money. People should be excluded for anti social behaviour. People earning £60,000 should not be allowed to register with all that money. Homeless people should be put into the private sector when housing is short
Agree with all changes
Does not apply to me I have applied for properties but never get one
Agree with all changes but length of residency for local connection too short needs to be at least 5years
Agree with changes but need to address length of time people are resident for local connection
Welcome especially 5 Armed Forces
Agrees with 3,4,5 and 11
Unhappy about 2 because he can't have his children visit in his bedsit
Agrees with 11 and 12. Thinks 13 should be in Emergency band. Banding table all homeless and all medical should be in Gold.
Disagrees with 5 and 6. Likes the £60k income limit
Agrees with 3,4,7,11,12,13
No comments
Disagrees with 1- Girls younger than 10 should not share with boys- mature earlier.
Agrees with 3
No comments
asks how 13 affects their own situation
Disagrees with 3 if family has separated and 5
Didn't think layout clear, disagrees with 2 and 8, need more detail on 4, how long will 11 apply, 13 doesn't understand
Disagrees with 1- Girls younger than 10 should not share with boys- mature earlier.
Doesn't affect him
Doesn't affect her
Disagreeing with ages of children sharing bedrooms
Agrees people coming out of forces should be given priority
Future bedroom need as a couple and how they will be able to have separate rooms
Question "Which Lord and Master dictates these changes?"
Disagreeing with ages of children sharing bedrooms
Disagreeing with ages of children sharing bedrooms
Need for extra bedroom as adults as mother & daughter, daughter providing care.
Daughter's ex-husband forcing sale of the house
Owner occupiers question "what if the person has been left by a partner with children and cannot afford their mortgage and house is in negative equity.
Disagrees with income level stating it should be at £40K.
Agrees with ASB and rent arrears history = non-qualifying
Agrees with visiting children
Agrees with owner occupiers
Multiple column criteria question "Does this mean bronze"

Question regarding change of banding and what band the household will be in once these changes are in place
Against owner occupiers stated "We doubt that we qualify now"
No comments over than "See my letter dated 30/12/12" with regards to Carers, Transfers, Eligibility, ASB rent arrears history, Income and Homelessness. NOTE: no letter attached to provide detail
No comments
No. 1 - Bedroom Eligibility - Is this in line with Housing Benefit?
No. 2 - Visiting Children - So no consideration given to part time care?
No. 7 - Carers - What assessment?
No. 8 - Multiple Criteria Column - Just removed or have med/multi combo?
No. 10 - Eligibility checked - Just eligibility or bed need, banding as well?
No. 1 - Bedroom Eligibility - I do not agree, young girls need privacy.
No. 2 - Visiting Children - Each case should be looked at individually.
No. 4 - Armed Forces - As long as there is a strong Local Connection, otherwise other areas should be offered first.
No. 5 - On discharge - Local connection should apply also.
No. 9 - Suspending rent arrears - Case by case assessment agreed.
No. 7 - Carers - Further confirmation of the assessment, what is it?
No. 9 - rent arrears suspension - What constitutes being unable to pay?
No. 11 - Non-qualifying - What does this mean for the client?
No. 13 - Homelessness - How will this work in practice? I.e. between local and private.
No. 7 - Carers - This is important
No. 8 - Multiple Criteria Column - Should keep this.
No. 2 - Visiting Children - So what are we doing with people with access and hard to let above ground floor.
No. 5 - Armed Forces - why would immediate discharge make a difference?
No. 6 - Foster Carers - Ok for private or owner, not ok for social as it won't be approved
No. 7 - Carers - What would be required?
No. 8 - Multiple Criteria Column - Need a tool for prevention. If multiple added to medical e.g. medical / multiple results then that could work but definitely need something.
No. 11 - Non-qualifying - Does this over ride change 9?
No. 12 - Income - Does this include equity.
No. 10 - Eligibility checked - I hope I will be able to stay on the housing register, the bronze category I was on seems to have been deleted altogether, as my circumstances may change.
No. 1 - Bedroom Eligibility - Does this need to be from 1/4 in line with Housing Benefit.
No. 2 - Visiting Children - Disagree totally. Changes to access laws in 2013. Both parents should have the chance to play a positive role in their children's lives when it is safe and in their best interest.
No. 5 - Armed Forces - Too late may as well make homeless when duty accepted.
No. 10 - Eligibility being checked - By whom?
No. 11 - Non qualifying - what level or R/A significant?
No. 12 - Income - Will everyone who applies be asked to supply wage slips?
No. 12 - Income - Where the ceiling for eligibility is set at a joint income of £55K, at more than twice the national average wage this seems excessively high to me.