

ANGUS COUNCIL

COMMUNITIES COMMITTEE – 1 OCTOBER 2024

REVISED COMMON ALLOCATION POLICY

REPORT BY ALISON SMITH, DIRECTOR OF VIBRANT COMMUNITIES & SUSTAINABLE GROWTH

1. ABSTRACT

- 1.1 This report seeks approval for the proposed revised Common Allocation Policy. The revised policy takes account of the requirements of key legislation; regulatory standards and statutory guidance; national policy developments; and the views of tenants, applicants, and other stakeholders.

2. ALIGNMENT TO THE COUNCIL PLAN AND COUNCIL POLICIES

2.1 Caring for our people

- Reduce inequalities in all our communities.
- Provide the best start in life for children.
- Create more opportunities for people to live well and achieve their personal goals.
- Improve physical, mental health and wellbeing.

2.2 Caring for our place

- Protect and enhance our natural and built environment
- Enable inclusive, empowered, resilient and safe communities across Angus

3. RECOMMENDATIONS

It is recommended that the Committee:

- (i) approves the revised Common Allocation Policy as detailed in Appendix 1;
- (ii) gives due regard and consideration to the consultation which has been undertaken with applicants, tenants, staff and other stakeholders in preparing the revised Common Allocation Policy; and
- (iii) notes an exemption was agreed, under delegated authority, by the Director of Vibrant Communities and Sustainable Growth to move the online application and choice-based letting system from Home Connections to NEC Software Solutions (Angus Council's current housing management system provider).

4. BACKGROUND

- 4.1 Angus operates a Common Housing Register (CHR). This is a single housing register, application process and allocation policy operating across Angus Council and three registered social landlords (RSLs): Hillcrest Homes; Caledonia Housing Association; and Blackwood Homes.

- 4.2 An allocation policy is one of a landlord's leading policies which sets out their aims and objectives when allocating properties. The outcomes of the policy must be compliant with a range of legislation, regulatory standards, and statutory guidance.

4.3 When reviewing the policy, we needed to consider: -

- The aim of the policy and the outcomes it seeks to achieve.
- What will and what will not be considered when allocating properties.
- The priority for housing that will be given to applicants depending on their housing needs and how we will give reasonable preference to the groups set out in legislation.
- Information about assessing and verifying applicants' needs.
- House size eligibility criteria.
- Exceptional circumstances flexibility to allow the participating landlords to allocate homes other than in accordance with the standard approach set out in the policy.
- Arrangements for suspending applicants from receiving offers.
- The appeals and complaints processes.
- Arrangements for monitoring and reviewing the policy.

4.4 The current Common Allocation Policy was approved by the Communities Committee in September 2017 (report 331/17 refers) and implemented in November 2020 alongside the introduction of Angus HomeFinder, an online housing application, property advert and bidding system.

4.5 The introduction of a Choice-Based Lettings (CBL) approach in 2020 was a considerable change from the traditional points-based allocation system that matched people to available properties. By introducing a CBL approach, the Common Housing Register Partners aimed to provide people with as much informed choice as possible about where they want to live. CBL makes the allocation process more transparent and makes more efficient use of housing stock, by reducing refusals and increasing satisfaction and tenancy sustainment. The use of online platforms and automated systems in CBL also aims to reduce the administrative burden of processing applications, streamline processes and simplify the application process as people can manage changes to their applications online.

4.6 Since CBL was introduced, we have seen applications increase from 1158 in 2020/21 to 3133 in 2023/24. The percentage of applicants who accept their first offer also increased from 72% to 84% in the first year of introducing CBL, with the percentage of offers refused reducing from 40.34% in 2020/21 to 22.97% in 2021/22. The percentage of tenancies sustained for more than a year has also increased from 88.5% in 2020/21 to 90.29% in 2023/24.

4.7 However we recognise that introducing CBL has also presented several challenges, particularly in relation to digital accessibility, people's understanding of the system and bidding process, managing expectations and balancing choice with meeting needs. As we review the policy, we will continue to ensure there are alternative options and support available for people who are digitally excluded, will make changes to the online system to ensure this is more user-friendly, and will undertake a review of resources as part of a wider service review to ensure the system runs smoothly and applications, advertisements and bids are managed effectively.

5. CURRENT POSITION

5.1 In line with the standard review cycle, a full review of the policy is required to ensure the policy continues to comply with all relevant legislation and statutory guidance, policy developments; meets the needs of applicants, tenants, landlords and other key stakeholders; and makes the best use of the properties available to allocate. The review also considered whether continuing a Choice Based Lettings approach is the right approach to deliver the overall objectives of the policy.

5.2 Tenants, applicants, and other stakeholders have participated in the review of the Common Allocation Policy. An initial survey was undertaken in Autumn 2022, inviting feedback on the existing policy from applicants; tenants from each of the CHR partner landlords; staff from Angus Council and partner landlords; elected members and support services. There were 123 responses, 28% identified themselves as a tenant of one of the CHR landlords, 21% identified

themselves as an applicant and 45% as a staff member. 72% of applicants or tenants who responded to the initial survey strongly agreed, agreed or neither agreed or disagreed with continuing a CBL approach to allocations.

- 5.3 Feedback from the initial survey was used to inform the revised draft policy. Further consultation was undertaken with applicants and tenants on the draft policy in May and June 2024. This involved attendance at six community and tenants' groups to discuss and invite feedback on the proposed changes. Four focus group sessions were also held for applicants and tenants and a survey on the Angus Engage website was shared via social media, email and through tenants' groups. We received 52 responses from this round of consultation.
- 5.4 The responses received during the second round of consultation were mixed, with many neutral responses. 42% agreed that the draft policy was simple, fair and open, while 42% disagreed. 37% agreed the draft policy met local needs and preferences and 42% disagreed. Key themes arising from this consultation which informed further changes and the final draft revised Common Allocation Policy, include:
- A need for increased priority for people who are homeless or at risk of homelessness, experiencing domestic abuse or harassment.
 - Ensuring people with housing needs resulting from their mental health are considered equally to people with housing needs resulting from their physical health.
 - Removing any barriers for people who wish to complete an application for housing.
 - A need to simplify application categories.
 - Agreement to extend suspension timeframes in certain circumstances.
 - Ensuring people with equal shared care of children have the same bedroom entitlement as other families with children.
 - Ensuring the policy supports children and young people who are care experienced.

A summary of the key themes and issues arising from both consultations and our responses is published on [Engage Angus](#) and attached as Appendix 2.

6. PROPOSALS

- 6.1 The revised Common Allocation Policy addresses the feedback received from both consultations and seeks to make finding a home as simple, fair, and open as possible, ensure priority for housing is given to people in greatest housing need and ensure the CHR partners make the best use of their housing stock.
- 6.2 To ensure we give priority for housing to people in greatest housing need, meet statutory reasonable preference requirements and national policy outcomes for homelessness, domestic abuse and care experienced children and young people, we have proposed changes to the priority bandings, as set out in Appendix 2.
- 6.3 Other key proposed changes include:
- Revised application categories to simplify the identification of transfer applicants and new housing register applicants. This will support CHR partners to make the best use of stock by creating allocation chains.
 - Review of application suspension timeframes, in certain circumstances, from six months to 12 months, in line with neighbouring local authorities.
 - Revised house size eligibility criteria.
- 6.4 In addition to the proposed amendments to the Common Allocation Policy, an exemption was agreed under delegated authority by the Director of Vibrant Communities and Sustainable Growth to move the online application and CBL system from Home Connections to NEC Software Solutions (Angus Council's current housing management system provider). The exemption was agreed under the basis that moving to NEC is necessary for the technical compatibility with the existing housing management system. An options appraisal was undertaken (appendix 3) and

demonstrates NEC Software Solutions is required to provide a better, more integrated solution for customers and staff.

- 6.5 Committee are asked to approve the revised Common Allocation Policy as detailed in Appendix 1. If the Policy is approved by committee members and our partner RSL boards, we will implement the proposed changes and new system by 31 March 2025.

7. FINANCIAL IMPLICATIONS

- 7.1 The build and implementation costs for a CBL module on NEC Software Solutions are still to be confirmed by NEC. There will be additional annual support and maintenance costs of approximately £2,438 per annum. These costs will be met by Angus Council's Housing Revenue Account and CHR partners.

8. RISK MANAGEMENT

- 8.1 Failure to approve the revised Common Allocations Policy and revised priority bandings may result in the Council and its RSL partners being unable to increase lets to homeless households and fulfil their statutory requirements under homeless legislation.

9. ENVIRONMENTAL IMPLICATIONS

- 9.1 There are no direct environmental implications arising from the recommendations of this report.

10. EQUALITY IMPACT ASSESSMENT, HUMAN RIGHTS AND FAIRER SCOTLAND DUTY

- 10.1 An Equality Impact Assessment has been carried out and is attached (appendix 5).

11. CHILDRENS RIGHTS AND WELLBEING IMPACT ASSESSMENT

- 11.1 A Childrens Rights and Wellbeing Impact Assessment has been carried out within the EIA.

12. CONSULTATION

- 12.1 In the preparation of this revised draft Common Allocation Policy engagement and consultation exercises were carried out with tenants, applicants, staff and other stakeholders prior to the revised draft being prepared and once a revised draft was produced. Consultation has also been undertaken with the Director of Finance and the Director of Legal, Governance and Change.

NOTE: The background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (other than any containing confidential or exempt information) which were relied on to any material extent in preparing the above report are:

- Report No 331/17 - Revised Common Allocation Policy

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List of Appendices: Appendix 1 Common Allocations Policy Draft
Appendix 2 Consultation Report
Appendix 3 Table of Priority Bandings
Appendix 4 Choice Based Lettings Information and Communications
Technology (ICT) Options Appraisal
Appendix 5 Equality Impact Assessment