



Committee and Date

Cabinet

19 October 2022

Item

Public

DRAFT HOUSING ALLOCATIONS POLICY & SCHEME

**Responsible
Officer**

Jane Trethewey, Assistant Director Homes and Communities & Laura Fisher, Head of Service - Housing, Resettlement and Independent Living

Email

jane.trethewey@shropshire.gov.uk
Laura.fisher@shropshire.gov.uk

1. Synopsis

- 1.1. Cabinet is requested to approve and adopt the draft allocations policy and scheme for allocations to Council owned stock and nominations to housing associations¹.

2. Executive Summary

- 2.1. The draft allocations policy and scheme aims to make best use of the flexibilities provided under the Housing Act 1996 to ensure social housing is allocated to those in the greatest need and support strategic housing priorities.
- 2.2. The draft policy has been subject to public consultation. Feedback has been considered, resulting in a number of amendments. A final draft allocations policy and scheme is now proposed.

3. Recommendations

- 3.1. Cabinet is asked to approve and adopt the draft policy and scheme, set out in Appendix I.

¹ Registered with the Regulator of Social Housing, known formally as Private Registered Providers

REPORT

4. Risk Assessment and Opportunities Appraisal

4.1. The initial review of the existing allocations policy and scheme identified three options for the future operation of the scheme:

- (i) Continue using choice-based lettings (CBL) and a common register, widening the policy and scheme to include all forms of affordable housing and encourage those housing associations operating in Shropshire who are not part of the existing scheme to take part.
- (ii) Continue using CBL, but move to having a housing register to allocate to council owned stock and nomination to housing association dwellings, this requires formal nomination agreements to be resurrected or drawn up with all the large housing associations operating in Shropshire; and
- (iii) Option (ii), but no longer to use CBL but to use direct lets for allocations to council owned stock and nominations to housing associations.

4.2. The risks associated with each option were considered to be:

- (i) By using an approach where each housing association uses their own policy and process for deciding which applicant is offered a property it can be difficult to ensure that those applicants in the highest need are able to access affordable housing.
- (ii) Although this option requires the need to introduce and monitor nomination agreements with all large housing associations who are registered with the Regulator of Social Housing, given that the definition of a nomination is when a person is allocated a housing association tenancy in line with the Council's allocation policy and scheme, the risk of those in the greatest need being overlooked for an offer of housing is minimised; and
- (iii) Applicants are familiar with the CBL model which can also be used to publicise new affordable and supported housing developments; therefore, it would be a risk not to continue with this model and further exploit its potential.

4.3. The initial review also considered future access to the housing register:

- (i) Continue with an open housing register, where the only ground for applicants to be disqualified for an allocation (and nomination) of social housing is due to unacceptable behaviour; and

- (ii) Introduce additional qualification criteria whereby applicants are required to have a local connection and to be unable to afford to meet their housing needs in the open market.

4.4. The risks associated with each consideration were identified as:

- (i) Given that social housing is such a scarce resource there is a risk that continuing with an open register would not ensure that those in the greatest housing need, especially those to whom the local authority has a duty to rehouse, are allocated accommodation; and
- (ii) There is the risk that there could be insufficient applicants for "difficult to let" properties in lower demand. However, should this situation arise, it should be considered in the landlord's asset management strategy and lead to an options appraisal as to whether to repurpose, remodel or redevelop these homes, to ensure that the housing offer meets current aspirations.

4.5. The resulting draft document set out the policy and scheme for: applications to the Housing Register; the allocation of Council owned housing stock; and nominations to housing associations. A choice based letting scheme would remain, however, the policy contained local connection and financial qualification criteria.

4.6. Following the public consultation, the feedback has resulted in the qualification criteria being amended: the local connection residency period has been increased to two years, although, as the Local Housing Authority, the Council will retain the discretion to dis-apply this in exceptional cases; and the gross household annual income threshold element of the financial qualification rising to £80,000 for those applicants who only wish to access low-cost home ownership dwellings.

4.7. In addition, due to concerns raised by housing associations relating to allocating "difficult to let" properties, those applicants not considered to be in housing need and applicants without a local connection will still be able to apply to join the register (therefore, no longer be disqualified) but will be placed in Band 7. In order to ensure that those in the greatest need are allocated accommodation, the Council will ensure robust monitoring of all allocations made under the policy.

4.6 Following consultation on the draft revised policy a further Equality, Social Inclusion and Health Impact Assessment (ESHIA) initial screening record has been completed; this is at Appendix II. This does not identify any issues with the draft policy and scheme. It has therefore not been necessary to amend the ESHIA, other than

to reflect the proposed changes to the qualification criteria, but this will be kept under review.

5. Financial Implications

- 5.1. The operation of the Council's allocation policy is currently funded by the General Fund, with STAR Housing and partner housing associations who advertise void properties paying the Council a fee for each advertisement. Given the proposed move to a Council housing register and nomination agreements, the existing funding arrangements will be reviewed as part of the implementation process. Any revised proposals will need to ensure that the Housing Revenue Account (HRA) only funds the allocation of dwellings held in the HRA.
- 5.2. The implement process itself will involve the re-registration of all existing applicants; at April 2022 this was just over 6,000 households. Therefore, will require additional resource whilst this process is being undertaken, but will be funded through existing budget allocations. The benefits of implementing the draft policy and scheme in terms of ensuring those in the greatest need are allocated affordable housing, will reduce budget pressures in other areas, in particular the cost to the Council of temporary accommodation provided to homeless households under the Interim Duty of the Housing Act 1996.

6. Climate Change Appraisal

- 6.1. It is acknowledged that the Policy is expected to have a 'no effect' outcome on the climate change impacts listed below:
 - energy and fuel consumption (buildings and/or travel)
 - renewable energy generation
 - carbon offsetting or mitigation, and
 - climate change adaptation.
- 6.2. There are no other anticipated environmental impacts associated with the recommendations in this report.

7. Background

- 7.1. As the local housing authority Shropshire Council must comply with Part VI of the Housing Act 1996 (as amended by the Localism Act 2011) when making allocations to local authority owned stock and nominations to Private Registered Provider (housing associations registered with the Regulator of Social Housing) accommodation.

- 7.2. Statutory guidance on social housing allocations for local authorities in England (January 2022) sets out how allocation schemes are to be framed. In summary the guidance covers:
- who is eligible for allocation, this relates to immigration status;
 - how local housing authorities can determine who can qualify for an allocation, this can relate to local connection, financial resources and unacceptable behaviour; and
 - the categories of persons that an allocation scheme must give “reasonable preference” to, this includes households who are homeless (not just those considered to be statutory homeless), overcrowded households, persons with medical and welfare needs, and those suffering from hardship.
- 7.3. The draft allocations policy seeks to ensure that those applicants in the greatest need are able to access social and affordable housing, this is especially significant given the current cost of living crisis. Moreover, the policy review has been influenced by the strategic need to:
- Prevent and tackle homelessness, including reducing the pressure on temporary accommodation;
 - Promote independent living and reduce admissions to residential care, by ensuring the best use of all tenures and types of social housing; and
 - Enable key workers on low incomes to access affordable housing.
- 7.4. To this end, the draft allocations policy and scheme is for applications to the Housing Register; the allocation of the housing stock owned by the Council and managed by STAR Housing; and nominations to Private Registered Providers for social and affordable rented and low-cost home ownership² properties and, in some circumstances, to private landlords. This is contained at Appendix I.
- 7.5. The CBL process will remain in place, with the intention that the majority of dwellings would continue to be advertised by STAR Housing and housing associations. However, formal nominations arrangements will be introduced, with all large housing associations being required to agree to nomination rights to 100% of allocations to new build homes, with nominations to re-lets and all existing stock be agreed on an individual basis.
- 7.6. Public consultation was undertaken over the period 9 May 2022 to 3 July 2022. Responses were received from a number of organisations and individuals, including housing associations, parish and town councils and elected Members. The consultation responses, contained in Appendix III, have resulted in a number of

² With the exception of Homes England grant funded shared ownership properties on non-exception sites

changes to the original draft. The consultation responses and relevant amendments to the policy are set out below:

- Request that the residency period increase from one year to three years – the draft policy has been amended to have a residency period of two years, on the basis that this is supported by central government policy recommendations.
- Concern from housing associations that the local connection and financial qualifications would result in “difficult to let” dwellings where there is low demand being impossible to let – in order to ensure that this situation does not arise bands one to six of the draft policy continue to only contain applicants who have a local connection to the Shropshire Council local authority area and who are in housing need, whereas band seven is now widened to contain those applicants who are considered to be able to meet their housing needs through the open market and those applicants without a local connection.
- Although there were requests to reduce the financial qualification in relation to household income, a number of responses asked for it to be raised – given that the policy covers all tenures of affordable housing, the financial threshold for a household, not to be considered in housing need, remains at a gross income of £50,000 per annum for rented accommodation, in the scenario where an applicant only wishes to access low-cost home ownership accommodation, the gross household income is raised to £80,000.
- A concern was raised that care leavers placed out of county would not have a local connection – the draft policy now states that where the Council is considered to be the corporate parent of a care leaver placed “out of county” this will establish a familial association, therefore a local connection.
- The original draft policy only allowed for council owned stock to be advertised as “Sensitive Lets”, following a request from a housing association for this to apply to all registered providers – the draft policy now allows all registered providers to potentially advertise dwellings as Sensitive Lets where appropriate.
- Feedback was received in relation to on the joint applications section in terms of it being too restrictive – to enable flexibility, the wording relating to joint applications has been amended to state that they can usually be made by couples or partners. Therefore, this does not prevent other forms of joint applications, but these will be subject to the discretion of the individual registered provider.
- Concerns were raised as to housing organisations recognising applicants’ specific needs when they bid for properties and are being considered for offers of accommodation – a statement setting this out is now included in the draft policy.

- The Council was asked to recognise the needs of prison leavers, so as to prevent homelessness and reducing re-offending – A specific category of “reducing re-offending” has been included in Band 2.
- A request was made to extend the review period in band 2 – given the limited housing stock the draft policy has been amended to increase the review period in band 2 from eight to twelve weeks.
- Feedback was received relating to the drafting of the policy and the need to define key workers – the draft policy now includes a contents page and a further appendix containing a definition of key workers.
- It was requested that the policy is subject to annual review – although it was always intended to regularly review the revised policy, the draft policy now states that it will be subject to an annual review.

7.7. In addition to the amendments set out in paragraph 7.6, in order to ensure clarity, officers proposed the following three amendments to the draft policy wording which are not considered to constitute a significant alteration of procedures:

- Clarification of the bedroom entitlement for divorced or separated parents / guardians – the draft policy now reads, “that unless it is stated in a legal document that residency is 50% for each parent / guardian, the other parent / guardian will not receive any bedroom entitlement for access visits”.
- So as not to raise expectations from those wishing to bid for dwellings, “direct lets”, this being when due to emergency or management issues void dwellings are directly allocated from the housing register, these should not be advertised – the wording in the draft policy has been amended to this effect.
- The number of refusals / failures to make contact applicants are allowed in a 12-month period before they are deferred has reduced from four to three.
- the draft policy now contains separate appeals and complaints sections.

8. Conclusions

8.1. The proposed draft policy seeks to ensure that the Council complies with the Housing Act and makes use of the flexibilities it provides, combined with an approach to ensure those in the greatest housing need are allocated social housing, be this existing or new build for rent or low-cost home ownership.

- 8.2. On the proviso that Cabinet agrees to approve and adopt the draft policy, subject to resources, it will be implemented in quarter 1 2023-24.

List of Background Papers

Shropshire Affordable Housing Allocation Policy and Scheme 2014

Cabinet Member

Portfolio Holder for Adult Social Care and Public Health

Portfolio Holder for Growth and Regeneration

Local Member

All

Appendices

Appendix I: Draft revised allocations policy

Appendix II: Equality, Social Inclusion and Health Impact Assessment

Appendix III: Summary of consultation feedback

Appendix I: Draft revised allocations policy

Allocations Policy and Scheme

Contents

	Page
Introduction	1
Aims of the Allocation Policy and Scheme	1
Eligibility	1
Qualification Criteria	2
Local Connection	2
Unacceptable Behaviour	3
Financial and Needs Assessment	4
Age of Applicants	5
Homeless Applicants	5
Transfer Applicants	5
Applying to the Housing Register	6
Verification	6
False Statements and Withholding Information	6
Worsening of Circumstances	7
Change of Circumstances	7
Statutory Requirements	8
The Banding System	9
Statement of Choice	9
How the Scheme Operates	9
Bedroom Entitlement	10
Access to Children	10
Fostering and Adoption	10
University / Full-time Study Away from Home	11
Overnight Carers	11
Supported Accommodation	11
Support / Care Packages	11
Advice and Assistance	12
Information about the Allocations Policy and Scheme	12
Local Lettings Plans and Policies	12
Letting Privately Rented Accommodation	13
Sensitive Lets	13
Direct Lets	13
Adapted Properties	13
Offers of Accommodation	13
Medical Assessment Procedure	14
Joint Applications	14
People in Prison	14
Pregnancy	15
Applications from Employees, Board Members, Councillors and their Relatives	15
Property Adverts	15
Equal Opportunities Statement	15
Appeals	15
Complaints	16
Monitoring and Review	16

Appendices

Appendix A: Bandings	17
Appendix B: Glossary and Definition of Terms	22
Appendix C: List of Information Required to Verify an Offer of Accommodation	24
Appendix D: Size and Type of Properties Eligibility Criteria	26
Appendix E: List of Local Lettings Plans and Policies	27
Appendix F: Key workers	28

1. Introduction

- 1.1 This Housing Allocation Policy and Scheme applies to the Shropshire Council unitary local authority area. References to Shropshire and the Council refer to the unitary local authority of Shropshire.
- 1.2 This document sets out Shropshire Council's Policy for applications to the Housing Register; the allocation of the housing stock owned by the Council, which is managed by its Arm's Length Management Organisation (ALMO), Shropshire Towns and Rural (STAR) Housing; and nominations to housing associations registered with the Regulator of Social Housing (for social and affordable rented and low cost home ownership³ properties) and to private landlords.
- 1.3 Officers act under delegated powers in accordance with this policy. All allocations and nominations are made from the Housing Register.

2. Aims of the Allocation Policy and Scheme

- 2.1 In Shropshire the demand for affordable housing exceeds available supply. Therefore, this housing allocation policy and scheme seeks to meet the following aims:
 - Ensure people in the greatest housing need have the greatest opportunity to access suitable housing that best meets their needs;
 - To prevent and relieve homelessness;
 - To make best use of the Council's and housing association stock;
 - To help the Council meet statutory and strategic aims;
 - To help contribute to the development of sustainable communities; and
 - To allow for the greatest degree of choice possible in the allocation of affordable housing.
- 2.2 Whilst this Policy is intended to be comprehensive, the Council recognises that it is not possible to cover every eventuality. In special cases with exceptional needs, the Head of Service - Housing, Resettlement and Independent Living has the discretion to award additional priority and approve offers of accommodation taking into consideration all factors relevant to the application.

3. Eligibility

- 3.1 Applicants ineligible under Government regulations will not be eligible to be accepted onto the Housing Register. Eligibility is a question of immigration status. The rules regarding eligibility are complex and subject to regular changes in immigration law. Applicants who are not British citizens can request further information from the Council before making an application.

³ With the exception of Homes England grant funded shared ownership properties on non-exception sites

3.2 Any applicant who has been excluded from the Housing Register on the grounds of ineligibility will be given written notice of the decision and the reasons for it and advise of their right of appeal (see section 40).

4. Qualification Criteria

4.1 The Council will usually only accept applications to the Housing Register who are in housing need. Housing need qualifying criteria is set out in Bands 1 to 6 in Appendix A. Applicants deemed not to be in housing need will be placed in Band 7.

Local Connection

4.2 The Council will usually only accept applications to the Housing Register from an applicant with a local connection to the Shropshire Council area. Local connection means that the applicant or a person who might reasonably be expected to reside with them either:

- Is normally resident within the local authority area of Shropshire; or
- Has a local connection with the area by virtue of family association or secure employment.

4.3 Normally resident means resident in accommodation for a period of at least two years immediately prior to an application being made. This does not include being detained in prison or resident in a bail hostel. Persons occupying holiday or other temporary accommodation (for example, hospital or student housing) are not considered as normally resident unless they can demonstrate that this has been their sole or main home for a period of at least five years.

4.4 Family association normally means that the applicant has parents, grandparents, adult children, grandchildren, a brother or a sister currently living in Shropshire and has been normally resident within Shropshire for at least five years. In cases where the Council is considered to be the corporate parent of a care leaver placed "out of county", this will establish a familial association. In exceptional circumstances and where support is required family association may include extended family, each case will be determined on its own merits. Applicants will be required to provide proof of local connection by virtue of family association.

4.5 Secure employment means the employment or self-employment of the applicant or an adult member of the household for at least one year's duration and at least 20 hours per week. Where this employment has been for less than one year at the time of application or is on a zero-hour contract, evidence will be required to confirm the nature of the employment.

4.6 Local connection requirements will not apply to the following applicants:

- members of the Armed Forces and former Service personnel, where the application is made within five years of discharge;
- bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner;

- serving or former members of the Reserve Forces who need to move because of serious injury, medical condition or disability sustained as a result of their service;
- existing social housing tenants in England who have a reasonable preference because of a need to move to Shropshire to avoid hardship and if they work or have been offered work in Shropshire and have a genuine intention to take up that offer;
- persons who need to move from another local authority area to escape domestic abuse; and
- persons who need to move from another local authority area to escape other forms of violence or harm.

4.7 Not having a local connection to Shropshire Council will not preclude those applicants identified to be within the class of person set out in section 13.1 of this Policy from being on the Housing Register. Such applicants will be placed in Band 7 unless exceptional circumstances apply (see section 4.15).

Unacceptable Behaviour

4.8 Applicants will not be accepted on to the Housing Register where it is decided that the applicant, or a member of the household with whom the applicant would usually reside, has behaved unacceptably.

4.9 Examples of unacceptable behaviour could include:

- Significant⁴ rent or mortgage arrears or breach of tenancy obligations where no attempt is being made to repay the debt or remedy the breach;
- Cautioned or convicted of a nuisance, anti-social or violent offence;
- Subject to an injunction under the Anti-social Behaviour, Crime and Policing Act 2014 or an Anti-Social Behaviour Order (ASBO) or equivalent;
- Conduct likely to cause serious nuisance, annoyance or harassment to neighbours;
- Using accommodation or allowing it to be used for immoral or illegal purposes;
- Fraudulent or duplicitous behaviour to obtain accommodation;
- Serious damage to or neglect of a property by the tenant or other occupants; or
- Committing violent or anti-social behaviour, or domestic, racist or other abuse.

4.10 Cases will be considered on an individual basis. The following criteria will be applied in determining whether an applicant (this includes existing Council tenants) is excluded from being able to go on the Housing Register for re-housing because of their unacceptable behaviour:

⁴ For example, those with amounts exceeding £1,000 may be disqualified from the Housing Register until the amount has been reduced to below £1,000 or consecutive payments for 26 weeks have been made, unless there are agreed extenuating special circumstances.

- There must be reliable evidence of unacceptable behaviour;
- In normal circumstances the behaviour concerned should have occurred within the last two years. In cases of a more serious nature, for example those involving criminal prosecution, a longer timescale may be appropriate; and
- There must be reasonable grounds for believing that the behaviour could continue or be repeated. For example, the applicant may have issued threats or there might be a history of repeat offending.

4.11 The decision as to whether to exclude an applicant from the Housing Register on the basis of unacceptable behaviour, be this due to the applicant's behaviour or the behaviour of a member of the household with whom the applicant would usually reside, will be made by the Shropshire Council's Head of Service - Housing, Resettlement and Independent Living.

Financial and Needs Assessment

4.12 Applicants with a household income of more than £50,000 gross per annum or savings and assets (including equity in a property) of more than £200,000 or both will usually be considered as not being in housing need and will be placed in Band 7. In the scenario where an applicant **only** wishes to access low cost home ownership accommodation, the cap on household income will be raised to £80,000 gross per annum. Lump sums awarded to Armed Forces service personnel injured or disabled in action will be disregarded.

4.13 The financial assessment will have regard to the financial resources of the applicant and the cost and availability of alternative suitable accommodation. Such applicants who can demonstrate that they have health or support needs that they are unable to meet in the open market will be considered on their individual merits by the Head of Service - Housing, Resettlement and Independent Living. Examples include:

- an applicant who is eligible for a Disabled Facilities Grant (DFG) to fund major adaptations to their existing home, where it is more cost-effective for the authority to re-house the applicant in accommodation appropriate to their housing need;
- an older person is committed to paying for care or support costs in order to remain living independently; and
- an applicant who requires specific accommodation to meet their housing needs, for example, the needs of disabled dependent children, but this accommodation is not available in the private sector, other than that provided by STAR Housing or a housing association.

4.14 As with all other decisions made under this policy, any applicant who is deemed to have such resources as not to qualify to be placed in Bands 1 to 6 will have a right of appeal against that decision (section 40).

4.15 Where an application to the Housing Register would not otherwise be accepted on the grounds of failing to meet the qualification criteria, as the Local Housing Authority, the Council will retain the discretion in exceptional circumstances where it is considered necessary to dis-apply the qualification

criteria and / or place the applicant in any other Band as set out in this policy.

- 4.16 Any applicant who has been excluded from the Housing Register on the grounds of failing to meet the qualification criteria will be given written notice of the decision and the reasons for it and advised of their right of appeal (see section 40).

5. Age of Applicants

- 5.1 Applicants will normally be at least 18 years of age. In the case of 16 and 17 year olds applicants must be care leavers or homeless / threatened with homelessness, and not deemed to be a child in need following an investigation by Social Services under section 17 of the Children Act 1989⁵. Applicants under the age of 18 must have a recognised support package and financial guarantor or guardian before being accepted on to the register.

6. Homeless Applicants

- 6.1 Shropshire Council has a duty to secure suitable accommodation for homeless households who are eligible for assistance, in priority need, have a local connection and who are not intentionally homeless, in Council, other Registered Provider (housing associations registered by the Regulator of Social Housing) or suitable private rented accommodation. Discharge of the main homelessness duty to the private rented sector will be made in line with the Homelessness (Suitability of Accommodation) (England) Order 2012.
- 6.2 It is important that persons who are homeless or threatened with being made homeless seek advice from Shropshire Council, or their local council, at the earliest opportunity.

7. Transfer Applicants

- 7.1 Existing tenants of Shropshire Council will be subject to the provisions of the Allocation Policy. Tenants wishing to transfer will not normally be considered for re-housing until they have been resident in their present home for one year.

8. Applying to the Housing Register

- 8.1 Persons wishing to register must complete an Application Form. The application can either be completed using a paper application form or online through the Shropshire Council website. Paper applications can be printed from the website and are available by post from Shropshire Council's Customer Contact Points.
- 8.2 The Application will then be assessed by Shropshire Council. Applicants will receive a written response confirming whether their application has been accepted. If accepted, the applicant will be provided with written

⁵ In this instance an application will be made by Social Services on behalf of the child in need and a support package will be in place.

notification of the Band in which they have been placed and given a registration date.

- 8.3 Where an applicant is not satisfied with the way their application has been assessed or determined they have a right of appeal (see Section 40).

9. Verification

- 9.1 On completing the Application Form applicants give permission for Shropshire Council to verify (check) the information that they have provided or will re-provide prior to any offer being made or any change of circumstance. This includes permission to contact other Council departments, for example Council Tax and Social Services, and other people or organisations such as previous and current landlords, the UK Border Agency and the police. Applicants will not be made an offer of accommodation until all information requested has been provided and verified. Appendix C lists the information applicants are required to submit to verify their housing application at both application and offer stage.
- 9.2 Shropshire Council may share information as appropriate where this is legally required and when providing nominations to housing associations and private landlords.

10. False Statements and Withholding Information

- 10.1 Ensuring all the information provided is true and accurate is the responsibility of the applicant. Verification checks will be undertaken at the point of offer to confirm the information on the application form is correct and up to date.
- 10.2 It is a criminal offence for applicants knowingly or recklessly to give false information; or to knowingly withhold information. It can carry a fine and in separate civil proceedings can lead to the loss of any accommodation let as a result of Shropshire Council relying on that false information.
- 10.3 Applicants are required to sign paper applications and certify online applications confirming the details they have given are correct to the best of their knowledge.
- 10.4 This Scheme falls within the provisions of Part VI of the Housing Act 1996. Section 171 of the Act states:
- (1) A person commits an offence if, in connection with the exercise by a local housing authority of their functions under this Part:
 - (a) they knowingly or recklessly make a statement which is false in material particular, or
 - (b) they knowingly withhold information which the authority has reasonably required them to give in connection with the exercise of those functions.
 - (2) A person guilty of an offence under this section is liable on summary conviction to a fine not exceeding level 5 on the standard scale.

10.5 Consequently, where Section 171 applies, Shropshire Council may bring a prosecution which if successful could result in a fine of an unlimited amount.

10.6 Where false information is found to have been given, the applicant may also be disqualified from the Housing Register on the grounds of unacceptable behaviour. Where false information has resulted in the applicant obtaining accommodation, the relevant Landlord may bring possession proceedings for recovery of the property.

11. Worsening of Circumstances

11.1 Applicants must not deliberately worsen their circumstances in order to obtain greater preference on the Housing Register. If an applicant is found to have deliberately worsened their circumstances they will either be placed in the Band corresponding to their circumstances at the time of their original application or may be disqualified from the Housing Register on the grounds of unacceptable behaviour.

11.2 Examples of deliberate worsening of circumstances might include:

- Selling a property that is affordable and suitable for an applicant's needs;
- Disposing or gifting assets, including property;
- Moving from a secure Assured Tenancy to insecure, overcrowded accommodation, where there is no good reason for this move; and
- Where there is evidence that it was reasonable for an applicant to have remained in their original accommodation.

11.3 Where an applicant has little or no control over their move to alternative accommodation, this will not be considered as a deliberate worsening of circumstances.

12. Change in Circumstances

12.1 If an applicant's circumstances change Shropshire Council must be informed straight away or as soon as is reasonably practicable. Examples of changes include change of address or change in family size.

12.2 If an applicant's circumstances change they may cease to be eligible for inclusion on the Housing Register, and their application will be disqualified. They will be informed if this is the case and advised of any right of appeal (see Section 40).

13. Statutory Requirements

13.1 Under the Housing Act 1996 Shropshire Council has to ensure that when allocating and nominating to housing accommodation **reasonable preference** is given to the following groups:

- people who are homeless within the meaning of Part 7 of the Housing Act 1996 (including those who are intentionally homeless and those not in priority need);

- people who are owed a duty by any housing authority under the Housing Act 1996 sections 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3);
- people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions;
- people who need to move on medical or welfare grounds, including grounds relating to a disability; and
- people who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship (to themselves or to others).

13.2 The Housing Act 1996 also requires that housing authorities must give **additional preference** to the following categories of applicants who fall within one or more of the reasonable preference categories and who have urgent housing needs:

- former members of the Armed Forces⁶
- serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service;
- bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner; and
- serving or former members of the Reserve Forces who need to move because of serious injury, medical condition or disability sustained as a result of their service.

13.3 Those applicants who are in the above categories and are placed in Bands 1 to 6 and are considered to have urgent housing needs will be given additional priority so that they are considered for re-housing ahead of other applicants in their respective Band.

14. The Banding System

14.1 The Allocations Policy is based on seven Bands with specific qualifying criteria (see Appendix A for more details). Each applicant's housing need and other circumstances are assessed on the information provided and the applicant is placed in the **highest** Band their circumstances allow. Within each Band applicants are ranked in date order from when they were registered into that Band.

15. Statement of Choice

15.1 Shropshire Council is committed to offering the greatest choice possible in the allocation of affordable housing in the county, whilst ensuring that housing is allocated to those with the greatest need.

⁶ Usually where the application is made within five years of discharge.

- 15.2 There will be certain situations where choice cannot be offered in the allocation of housing, such as when the Council needs to make a direct let as a matter of urgency. These circumstances are detailed within the scheme.
- 15.3 With the exception of these limited circumstances, housing will only be allocated to applicants who apply for a specific property, and all applicants have the opportunity to bid for properties they are entitled to be considered for, having regard to household size and other eligibility criteria.

16. How the Scheme Operates

- 16.1 All properties managed by STAR Housing that become available for letting and all housing association properties where the Council has nomination rights will be advertised through choice-based lettings. Housing associations and private landlords are able to advertise other properties where nomination rights do not apply. The scheme operates on a weekly property cycle from a Wednesday to the following Tuesday. The exact rent, service charge, for sale price, tenancy type and length of tenancy will be clearly advertised on the property details.
- 16.2 Those applicants who have been accepted onto the Housing Register can then bid (apply) for properties that are advertised. Applicants **are** able to apply for one property each cycle. When the bidding period has closed the advertised property will be offered to the bidder in the highest Band for whom the property is suitable and who has been within that Band for the longest period of time, unless otherwise provided by this Policy.
- 16.3 In the event that the bidder does not want to accept the property then it will be offered to the bidder in the same Band who has been waiting the second longest and then so on. Only when bidders in the highest Band have been considered, will ~~the~~ those in the next highest Band be offered the property.
- 16.4 When a property is allocated, notification will be given on the Shropshire Council website identifying the Band of the successful applicant and their registration date.

17. Bedroom Entitlement

- 17.1 Where possible, adverts will show the number of bedrooms available and number of people they are suitable for to enable eligibility to be exactly matched, for example, three bedroom five persons. Adverts will also show if any restrictions apply to the type of household that can apply.
- 17.2 Those applying for properties should ensure their income, including housing and welfare benefits, is sufficient to fully cover all the rent and charges associated with the accommodation.
- 17.3 The number of bedrooms required for each household is calculated in accordance with age, sex, marital status composition and the relationship of the members to one another. A separate bedroom is required for each married or cohabitating couple, for any other person aged 16 years or over,

for each pair of children aged 0 to 15 years of the same sex, and for each pair of children under 10 years of the same or opposite sex. If that is not possible, he or she is counted as requiring a separate bedroom, as is any unpaired child under the age of 10 years. Additional bedroom/s required because of a medical condition/s will be considered as part of the medical assessment procedure.

17.4 Appendix D gives examples of what size and type of property an applicant can usually expect to be offered, therefore, should bid for.

18. Access to Children

18.1 In the case of divorced or separated parents / guardians, a child will typically be expected to reside with one parent / guardian as their main residence. Unless it is stated in a legal document that residency is 50% for each parent / guardian, the other parent / guardian will not receive any bedroom entitlement for access visits.

19. Fostering and Adoption

19.1 Where a household has formal evidence that, subject to a suitable property becoming available, approval would be given to foster or adopt a child or children, subject to confirmation from a Social Worker, each child would usually be entitled to a separate bedroom. Verification of fostering and/or adoption arrangements will be carried out at point of offer of accommodation.

20. University / Full-time Study Away from Home

20.1 Household members studying away from home in full-time courses will be considered in bedroom entitlement unless they are the main applicant.

21. Overnight Carers

21.1 Where a household has formal evidence that an overnight carer or team of carers is needed three or more nights per normal week, a carer shall be included in the bedroom eligibility calculation.

22. Supported Accommodation

22.1 Applicants can indicate whether they want to be considered for supported accommodation on the application form but will usually be offered one only if they meet the following criteria:

- Older persons' sheltered or independent living accommodation – applicants aged 55 or over with support needs. Applicants will be expected to sign-up to a support package.
- Older persons' extra care sheltered accommodation – applicants aged 55 or over with support and/or care needs. Applicants require a referral from a social care manager to be considered for this type of housing. Applicants will be expected to sign-up to a support and care package.
- Other supported housing - applicants must meet the requirements set out in each scheme's eligibility criteria. Applicants will usually require a

referral from a social care manager to be considered for this type of housing. Applicants will be expected to sign-up to a support and / or care package as appropriate.

22.2 Bungalows will usually only be offered to applicants who have poor health and/or a disability who require accommodation on one level.

22.3 Other properties may be designated, for a limited period of time, for applicants who fall into a particular age category to ensure the continued sustainability of a particular block or area of housing. These may be subject to local lettings policies (see below).

23. Support / Care Packages

23.1 Some applicants (such as care leavers, and people with serious mental illness, dementia, or learning disabilities) will only be eligible for an offer of accommodation once it is confirmed that they have a recognised support/care package in place. This support/care package need not be provided through Social Services, but could include other forms of support, for example from family or friends. The support/care package will be reconfirmed before an offer of accommodation is made to ensure that applicants are supported to live successfully in their new home.

24. Advice and Assistance

24.1 Shropshire Council is unable to provide personal appointments. However, staff are able to signpost applicants to other sources of advice and assistance including those of dedicated teams and organisations throughout Shropshire. In particular, assistance will be provided to anyone who may have difficulty participating due to disability, learning disability, illness, age, not speaking English as a first language, or any other reason that might make it harder for them to fully participate within the scheme. Where applicants are unable to submit bids themselves an assisted bidding process can be offered.

25. Information about the Allocation Policy and Scheme

25.1 Anyone who wishes is entitled to a free summary of the Allocation Policy and Scheme, which can be obtained from Shropshire Council. A copy of this document is available to be downloaded from the Shropshire Council website.

25.2 Applicants to the Housing Register are also entitled to request details of information that has been used to assess their application. Requests must be submitting in writing.

25.3 When each property advertised has been successfully allocated, the banding and registration date of the successful applicant will be made available on the website. This information should be sufficient for applicants to determine their prospects of success in obtaining housing, and to estimate how long they are likely to have to wait to obtain such housing.

26. Local Lettings Plans and Policies

26.1 Local Letting Plans are usually introduced to:

- Balance communities to achieve sustainable neighbourhoods;
- Deliver specific local strategic outcomes; and
- Due to planning conditions.

26.2 Affordable housing dwellings may be subject to special planning conditions or legal restrictions applied through Section 106 of the Town and Country Planning Act 1990 (as amended) specifying local occupancy or employment conditions on who is able to live in the accommodation. These conditions are usually found in rural settlements and aim to ensure that applicants on the Housing Register who have a local connection with a specific parish or defined area are given priority for rehousing, over and above those who do not have that connection. Each Section 106 document will set out the specific detail of the Local Lettings Policy.

26.3 Where a Local Letting Plan or Policy is in place, priority will normally be given to applicants who directly meet the criteria of the Plan. Details of each Local Letting Plan or Policy will be available on request from the Council. Advertisements for properties included in the Local Letting Plan will specify the required criteria.

27. Letting Privately Rented Accommodation

27.1 Private landlords (this does not include housing associations registered with the Regulator of Social Housing) who offer affordable housing to households on the Housing Register may use additional criteria when selecting prospective tenants. The use of a Private Landlord's Letting Plan must be agreed with Shropshire Council and referred to in the property advertisement. The Plan must also be available to applicants on request.

28. Sensitive Lets

28.1 There may be circumstances where properties will be identified for Sensitive Let. This means specific criteria will be applied to individual properties to achieve wider objectives. Where a Sensitive Let is identified, priority may be given to applicants who directly meet the required criteria. Advertisements for properties defined as Sensitive Lets will specify the required criteria.

29. Direct Lets

29.1 Shropshire Council and its ALMO, STAR Housing, may from time to time need to make a Direct Let of a property to an applicant in exceptional or urgent circumstances, for example to facilitate or maintain essential support arrangements, or for an applicant who has very specific housing requirements.

30. Adapted Properties

30.1 Properties which have been adapted to meet the needs of people with disabilities will be identified when advertised. In order to ensure best use of stock, priority will normally be given to the applicants requiring the adaptations provided.

31. Offers of Accommodation

31.1 Applicants have a responsibility to ensure their contact details are up to date including, change of address, contact telephone numbers and email addresses. Shropshire Council publishes a list of supporting information required at point of offer which applicants are expected to have available immediately for verification. In most instances offers of accommodation will be made by telephone and applicants will be given three working days to respond. If applicants do not respond within this timescale, the offer may be withdrawn.

31.2 Where the offer of accommodation is to an applicant where a statutory homeless duty is owed by Shropshire Council, they will be given three working days for applicants to respond. If no response is received the Landlord will notify the Housing Options Team and agree whether to withdraw the offer.

31.3 Those applicants, with the exception of those with a homeless duty, who have refused or have failed to make contact on four or more occasions within a twelve-month period when suitable offers of accommodation have been made through the Allocation Scheme, will be deferred and therefore be declined further offers for a period of up to six months. The Council will write to the applicant and inform them of the reason as to why they have been deferred.

31.4 Landlords will make formal offers of accommodation in writing, either by letter or email.

32. Medical Assessment Procedure

32.1 Shropshire Council will assess and verify medical need/s which are directly affected by the applicant's accommodation and where a move to more suitable accommodation is needed.

32.2 Information is taken from the application with any supporting evidence to determine if there is a medical need and the level of this need. In exceptional circumstances, an independent medical assessment may be sought.

33. Joint Applications

33.1 Joint applications can usually be made by:

- A married couple;
- A civil partnership couple; and

- Partners (including same sex couples)⁷.

33.2 Where a sole application becomes a joint application, the original or earliest registration date of the two will apply. Should the parties of the joint application then wish to separate their applications, the respective dates at which they each separately registered will then apply.

34. People in Prison

34.1 Applications will be accepted from those currently in prison provided eligibility and qualification criteria are met. Shropshire Council works with a range of agencies to prepare people for release from prison and to prevent homelessness. While preparation for release may begin sometime prior to release, applicants should be mindful that bids made one month or more before the release date will not normally be considered.

34.2 Upon release an update application will be required and if applicable liaison with any support workers and agencies.

34.3 Emergency cases will be referred to Shropshire Council's Housing Options Team.

35. Pregnancy

35.1 Where a household member is pregnant, the pregnancy will only be considered once a medical certificate such as a MATB1 is received. Until the birth and the sex of the child or children can be confirmed the bedroom entitlement assumption will be set at the minimum number according to the above criteria.

36. Applications from Employees, Board Members, Councillors and their Relatives

36.1 Applications are monitored carefully to ensure that all allocations are made in line with this policy and no favour is given to those with close links to Shropshire Council, STAR Housing or housing associations with housing stock in Shropshire.

37. Property Adverts

37.1 Available properties are published each week. The scheme operates on a weekly property cycle from a Wednesday to the following Tuesday with applicants able to bid (apply) for one property each cycle.

37.2 Those applicants with email addresses will be sent a weekly link to available properties. Those applicants who have no internet access, who cannot access the internet elsewhere and do not have anyone who is able to bid on their behalf, can request that the Council undertakes bidding on their behalf.

⁷ This does not include friends.

38. Equal Opportunities Statement

38.1 Shropshire Council believes that it is a fundamental right for everyone to be treated fairly, with respect and dignity; in the implementation of this policy it will ensure that this right is promoted and upheld. This includes the need to ensure that applicants' specific needs are recognised when they bid for properties and are being considered for offers of accommodation.

39. Appeals

39.1 Any applicant to Shropshire Council's Housing Register has a right to make an appeal if they disagree with a decision made by the Council, such as disqualifying them from registration, **or** the banding awarded.

39.2 For decisions made by Shropshire Council the applicant should appeal / complain in writing to the Head of Service - Housing, Resettlement and Independent Living. An applicant can also appoint an advocate and, once appointed, Shropshire Council will deal directly with that advocate.

39.3 There are two stages to the appeals ~~complaints~~ process:

Stage 1

The appeal must be made in writing within 21 calendar days of the date of the decision letter, stating the grounds for the appeal. The appeal will be considered by the Head of Service - Housing, Resettlement and Independent Living or nominated representative, and a decision will normally be given within 21 calendar days. In complex cases it may not be possible to give a decision in 21 days and may take longer. Where this is the case the applicant will be notified in writing prior to expiry of the 21 day period.

Stage 2

If the applicant is unhappy with the decision made by the Head of Service - Housing, Resettlement and Independent Living they may request that a further review be carried out by the Director of People or their nominated representative. This request must be made in writing within 7 days. Again, a decision will normally be given in 21 days, subject to extension where necessary.

39.4 If still unhappy with the outcome of the appeal, the applicant may make a complaint to the Local Government and Social Care Ombudsman.

39.5 Where an offer of accommodation has been made to discharge the main homelessness duty, this will be subject to a different review process.

40. Complaints

40.1 Complaints about the policy should be made in the first instance to the Head of Service - Housing, Resettlement and Independent Living.

40.2 A copy of the full complaints procedure is available from Shropshire Council.

41. Monitoring and Review

41.1 Shropshire Council monitors all allocations and reports this in a 'Quarterly Monitoring and Statistics Report' which is published and available to download from the Shropshire Council website.

41.2 This policy and scheme will be subject to annual review, seeking to ensure it reflects changes in legislation and meets its aims.

Appendix A: Bandings

All qualifying applicants will be allocated to one of the following Bands according to their particular circumstances. Subject to exceptional circumstances as set out in section 4.15, applicants in Bands 1 to 6 will require a local connection.

Band 1:

Band 1A

Homeless households who are owed the main duty and are currently accommodated in emergency accommodation and other emergency cases:

- Households who are homeless and are owed the main duty including when they have become homeless or the Relief Duty has come to an end and they have been assessed as being eligible for assistance, unintentionally homeless, in priority need and have local connection and are currently accommodated in emergency accommodation provided by the Council⁸.
- Other households in emergency housing need where the authority has a statutory duty to provide housing.

Band 1B

Homeless households who are owed the main duty and where Council tenants need to move due to major works or demolition:

- Households who are homeless and are owed the main duty including when they have become homeless or the Relief Duty has come to an end and they have been assessed as being eligible for assistance, unintentionally homeless, in priority need and have local connection.
- Where Shropshire Council require tenants to move to alternative accommodation to allow major works to be undertaken (such as modernisation or demolition).

Where households are homeless and owed the main duty Shropshire Council's Housing Options Team will bid on applicants' behalf for each suitable property that becomes available. When a successful bid is made for a property the applicant will be notified of this and, subject to rights of review under Part VII of the Housing Act 1996 (as amended), this will constitute an offer of housing under Part VI as a discharge of the Council's homelessness duty.

Band 2:

Homeless households who are owed the Relief Duty, urgent medical need, hospital discharge; care leavers, serious disrepair, persons who are fleeing domestic abuse or other forms of violence or harm and reducing re-offending:

- Applicants who are homeless and are owed the Relief Duty and would be owed or likely to be owed the Main duty when the Relief Duty came to an end, because they are or are likely to be in priority need and unintentionally homeless.

⁸ This includes care leavers, where the Council is considered to be the corporate parent (so may have been placed "out of county"), who are owed the main homelessness duty and are accommodated in emergency temporary accommodation provided by the Council.

- Urgent medical need where the applicant's (or member of their household who is moving with them) condition is currently directly affected by their accommodation and an urgent move is needed to have a positive effect on their medical condition, or where as a result of their condition their current accommodation is not suitable to their needs. An investigation will be carried out. For Urgent Medical Need it is generally expected that the property cannot reasonably be occupied as the applicant is either unable to use or has serious difficulty using an essential part of the property, for example, the WC.
- Applicants who have been released from hospital and cannot return to the property. Severity of medical illness does not determine the housing banding. Medical evidence will be required.
- Where a young person who has been looked after, fostered or accommodated by Shropshire Council, is engaging with the support provided, and there will be a duty to rehouse accepted by Shropshire Council within six months of the young person being ready for independent living.
- Serious disrepair refers to the condition of the current accommodation. This will apply where the Council has deemed the applicant's home to have the presence of Category 1 Hazards, Bands A - C under the Housing Health & Safety Rating System and these Hazards cannot be resolved or reduced to a Category 2 Hazard with six months.
- Applicants who are fleeing domestic abuse or other forms of violence or harm. All applications will be taken seriously and will be fully assessed in conjunction with partner agencies and landlords.
- Reducing re-offending – applicants due to be released from prison where a personal housing plan has been undertaken and a support package is in place.

Unless specified otherwise in this policy, Band 2 will normally be valid for 12 weeks from date of award. If accommodation has not been secured in this period there will be a review carried out. If no suitable properties have become available during the period time in Band 2 will be extended for a further period, usually six weeks. If the applicant has been bidding for suitable properties but has not been successful, the status may be extended. If however, the applicant has failed to bid for properties, or has been bidding for unsuitable properties, the reasons for this will be determined and if there are valid reasons the time in Band 2 may be extended, but where there are insufficient reasons, the Band will be withdrawn and the applicant will be reassessed accordingly.

Band 3:

Resettlement, homelessness prevention, serious medical need, use and occupation, over-crowding, under-occupation and members of the armed forces to be discharged within six months:

- Resettlement - applicants have been assessed as ready to move from hostel or other temporary supported accommodation into settled accommodation. Where appropriate, arrangements will be made for tenancy support.

- Applicants who are threatened with homelessness and are owed the Prevention Duty and would be likely to be owed the Main duty if both the Prevention Duty and any Relief Duty that followed on were to end unsuccessfully and they would be, or would likely to be, found to be in priority need and unintentionally homeless.
- Serious medical need will apply where the applicant's (or member of their household who is moving with them) condition is currently directly affected by their accommodation and a move is needed to have a positive effect on their condition, or where as a result of their condition their current accommodation is detrimental to health and wellbeing. An investigation will be carried out.
- Use and occupation - following the death of the tenant, occupiers of Registered Provider⁹ dwellings who either do not have succession rights or a non-statutory succession cannot be granted as the current property would be under-occupied or considered unsuitable. Following notice served by a tenant and an assignment cannot be granted to the remaining occupants.
- Overcrowding – assessments will be based on the bedroom entitlement at Appendix D. Lodgers will not be included in the assessment.
- Under-occupation by one or more bedrooms by a tenant of a Registered Provider¹⁰ where the property is in Shropshire.
- Where a member of the British Armed Forces is going to be discharged within 6 months or has been discharged but been unsuccessful in finding permanent suitable accommodation. If part of a couple separating, this criterion would not apply to their ex-partner's application. Those that have been dishonourably discharged will be considered individually based upon the circumstances and reasons for the discharge.

⁹ In the case of a private registered provider (housing association) there will usually be an agreement between the PRP and the Council that the resulting void dwelling will be subject to nomination rights.

¹⁰ In the case of a private registered provider (housing association) there will usually be an agreement between the PRP and the Council that the resulting void dwelling will be subject to nomination rights.

Band 4:

Need to give or receive support, moderate medical need, disrepair, overcrowding, excessive travel and homelessness:

- Give or receive support from close family members and / or move closer to local facilities. Where not having a move would result in serious detriment.
- Moderate medical need where the applicant's (or member of their household who is moving with them) condition is currently directly affected by their accommodation and a move is needed to have a positive effect on their condition, or where as a result of their condition their current accommodation is not suitable to their needs
- Disrepair where the Council has deemed the applicant's home to have the Presence of Category 2 Hazards, Band D under the Housing Health & Safety Rating System.
- Overcrowding where there is a need for one additional bedroom – assessments will be based on the bedroom entitlement at Appendix D. Lodgers will not be included in the assessment.
- Excessive travel, where applicants in, or due to be in, permanent full-time employment (20+ hours per week) are subject to excessive travel (over 1 hour each way).
- Homeless is where the Council accepts a household is homeless but to whom it does not owe a duty to secure settled accommodation because they are not considered to be in priority need or because they are intentionally homeless.

Band 5:

Sharing essential facilities, forced to live apart, above ground floor flat with child or pregnant, and key workers:

- Sharing essential facilities such as bathroom, toilet or kitchen with a separate household¹¹.
- Family forced to live apart, where the family that has previously lived together find themselves in circumstances where it is impractical to reside in the same house due to financial, work or other commitments.
- The applicant has a child under ten or is pregnant and lives in a first floor flat or above.
- The applicant is considered by the Council to be a key worker.

Band 6:

Following a financial and need assessment, applicant is considered to be in housing need.

¹¹ Where the households sharing essential facilities are parents and their adult children this does not apply

Band 7:

Applicant is either not considered to be in housing need and/or does not have a local connection

- Following a financial and need assessment, applicant is not considered to be in housing need.
- Applicant is not deemed to have a local connection (and where there are no exceptional circumstances as set out in section 4.15).

Appendix B:

Glossary and Definition of Terms

Affordable Housing	Affordable housing comprises social and affordable rented accommodation and low-cost home ownership products [see NPPF]
Affordable Rent	Rent which is to 80% of local open market gross rent.
Allocation	Selecting a person to be a council tenant or nominating a person to be a housing association tenant.
Bidding for a Property	The applicant's way of expressing an interest in being re-housed in that property
Choice-Based Lettings	More commonly known as CBL. A process used to advertise available properties and asking applicants to choose for themselves the properties they would like to be considered for.
Community Benefit	An allocation used to promote the best interests of the local community, detailing how the eligibility for a property departs from the standard criteria within the Allocation Policy.
Direct Let	Used in urgent situations where the Council directly allocates or nominates to a property.
Housing Register	The list of all those registered with Shropshire Council for affordable housing.
Key worker	Someone whose role provides an essential service deemed crucial to the economy and wellbeing of society.
Local Letting Plans	Specifies how the qualification and eligibility for a property departs from the standard criteria within the Allocation Policy.
Main Duty	Where a homeless household is found by the local housing authority to be eligible for assistance, homeless but not intentionally so, in priority need and with a local connection they are owed the main duty of an offer of suitable accommodation.

Nomination	When a person is allocated a housing association tenancy in line with the Council's allocation policy and scheme.
Prevention Duty	If a homeless household is eligible for assistance and threatened with homelessness within 56 days, the local housing authority is required to work with them to prevent them becoming homeless.
Registered Providers	Housing organisations that are registered with the Regulator of Social Housing. Local authorities who own social housing stock are Registered Providers. Private Registered Providers are usually called Housing Associations.
Relief Duty	If a homeless household is eligible for assistance and is homeless, regardless of priority need, the local authority is required to take reasonable steps assist the household to obtain accommodation, this duty could last for up to 56 days.
Sensitive Let	Used for specific properties in the best interests of the local community.
Section 21 Notice	A formal document giving two months' notice on an Assured Shorthold Tenancy to vacate a property.
Section 106 Agreement	Some properties may be restricted under agreements pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended), imposing conditions on who is eligible to be allocated / nominated, such as including a local connection requirement to a specific parish or area.
Shared Ownership	Where a person buys a proportion of a new home and pays rent on the remaining portion.
Statutory Homeless	A term that refers to people or families to whom a local housing authority has a duty to make an offer of suitable accommodation – this could be a council or housing association property or a twelve-month tenancy of private rented accommodation.

Appendix C: List of Information Required to Verify an Offer of Accommodation

Please note that this is not an exhaustive list.

Local Connection

A copy of one of the following documents either from the applicant or from the close relative must be provided:

- Council tax bill
- Employment or contract of employment details
- Tenancy agreement

Without the documentation shown above, your local connection will not be verified.

Identification

- Passport sized photograph of applicant
- Original or certified copy of birth certificate or passport for applicant and for each household member included on the applicant's application
- Where applicable, proof of name change via Deed Poll
- Where applicable, original or certified copy of Marriage certificate

Housing

- A copy of Tenancy agreement
- A copy of Licence agreement
- A letter from friend or relative confirming the applicant's living arrangements - (letter should state date when the applicant moved in and number of bedrooms to which they have access)
- A current valuation of the applicant's home
- A copy of the applicant's latest mortgage statement
- Confirmation of Tied accommodation

Income

A copy of award letter or bank statements showing the following amounts:

- Employment Support Allowance
- Income Support
- Child Benefit (award letter only)
- Child Tax Credit
- Working Tax Credit
- Incapacity benefit
- DLA
- Carer's allowance
- Pension credit

- State Pension
- Occupational Pension
- Rent income
- Personal Independence Payment (PIP)
- Council tax benefits
- Universal credit
- Child support payments
- Last 3 months or 5 weeks of payslips for each employment
- A copy of self-employed accounts

Assets

- Independent property valuation
- Current, saving and investments bank accounts
- Premium bonds

Appendix D: Size and Type of Properties Eligibility Criteria

It is expected that for working age applicants the size of property for which they are entitled is in line with the DWP bedroom standard, however if applicants can demonstrate that they are able to pay rent with or without recourse to Housing Benefit, they may be considered for a property with an additional bedroom, this being subject to availability.

If a person named on an application as being part of the household is aged 16 or over they are classed as a person who is not a child and, therefore, as needing their own bedroom.

Households will usually be able to choose the floor level on which they want to live (depending on property type) unless there is an assessed need for a particular floor level. For example, if priority for ground floor accommodation is recommended on medical grounds.

The criteria listed below will usually be used when deciding what property is suitable for a household.

Household	Properties usually considered suitable
Single person of working age ¹²	Room in shared house, bedsit or 1 bedroom flat
Single person over working age	Bedsit, 1 or 2 bedroom flat or bungalow
Couple both of working age	1 bedroom flat
Couple with one or both over working age	1 or 2 bedroom flat or bungalow
Pregnant woman with no other children	1 or 2 bedroom flat, maisonette or house
Family with one child	2 bedroom flat, maisonette or house
Family with two children aged under 10	2 bedroom flat, maisonette or house
Family with two children aged under 16 of the same sex	2 bedroom flat, maisonette or house
Family with two children of different sex, where one or both children are aged 10 or over	3 bedroom flat, maisonette or house
Family with three children	3 bedroom flat, maisonette or house
Family with four children	3 or 4 ¹³ bedroom flat, maisonette or house
Family with five or more children	4 or 5 ¹⁴ bedroom house
Household needing 2 bedrooms where all are adults	2 bedroom flat or maisonette

¹² Working age includes anyone who is under the State Pension Credit age at the time

¹³ Depending on age and sex of children

¹⁴ Depending on age and sex of children

Appendix E: List of Local Lettings Plans and Policies

Hanley Lane, Bayston Hill
Oak Meadow, Bishops Castle
Chapel Close, Bomere Heath
Rastick Close, Bridgnorth
Tasley Area, Bridgnorth
Wenlock Rise, Bridgnorth
Love Lane, Cleobury
Shrewsbury Road, Cockshut
Brook Close, Condover
The Leasowes, Ford
Bearcroft, Hinstock
Warren Court, Market Drayton
Orchid Meadow, Minsterley
Callaughton Lane, Much Wenlock
Castle Fields, Oswestry
Plas Ffynnon Way, Oswestry
Willow Gate, Castle Street, Oswestry
Wingate Way, Park Hall, Oswestry
Thomas Beddoes, Shifnal
Battlefields, Shrewsbury
Sweetlake Meadow, Shrewsbury
White Lodge, The Mount, Shrewsbury
Bower Farm, St Martins
Church Farm, Tilstock
Round Meadow, Wem
Saxon Fields, Wem
Pipegate, Woore

Appendix F: Key workers

Health and Social care

Includes doctors, nurses, midwives, paramedics, social workers, care workers, and other frontline health and social care staff including volunteers; the support and specialist staff required to maintain the UK's health and social care sector; those working as part of the health and social care supply chain, including producers and distributors of medicines and medical and personal protective equipment.

Education and childcare

Includes childcare, support and teaching staff, social workers and specialist education professionals.

Key public services

Includes those essential to the running of the justice system, religious staff, charities and workers delivering key frontline services, those responsible for the management of the deceased, and journalists and broadcasters who are providing public service broadcasting.

Local and national government

Only includes those administrative occupations essential to the effective delivery of essential public services, such as the payment of benefits, including in government agencies and arm's length bodies.

Food and other necessary goods

Includes those involved in food production, processing, distribution, sale and delivery, as well as those essential to the provision of other key goods (for example, hygienic and veterinary medicines).

Public safety and national security

Includes police and support staff, Ministry of Defence civilians, contractor and armed forces personnel (those critical to the delivery of key defence and national security outputs), fire and rescue service employees (including support staff), National Crime Agency staff, those maintaining border security, prison and probation staff and other national security roles, including those overseas.

Transport

Includes those who keep the air, water, road and rail passenger and freight transport modes operating, including those working on transport systems through which supply chains pass.

Utilities, communication and financial services

Includes staff needed for essential financial services provision (including but not limited to workers in banks, building societies and financial market infrastructure), the oil, gas, electricity and water sectors (including sewerage), information technology and data infrastructure sector and primary industry supplies, as well as key staff working in the civil nuclear, chemicals, telecommunications (including but not limited to network operations, field engineering, call centre staff, IT and data infrastructure, 999 and 111 critical services), postal services and delivery, payments providers and waste disposal sectors.

Appendix II: Equality, Social Inclusion and Health Impact Assessment (ESHIA)

Initial Screening Record

A. Summary Sheet on Accountability and Actions

Name of proposed service change
<i>Revised housing allocations policy and scheme</i>

Name of lead officer carrying out the screening
Melanie Holland

Decision, review, and monitoring

Decision	Yes	No
Initial (part one) ESHIA Only?	✓	
Proceed to Full ESHIA or HIA (part two) Report?		✓

If completion of an initial or Part One assessment is an appropriate and proportionate action at this stage, please use the boxes above. If a Full or Part Two report is required, please move on to full report stage once you have completed this initial screening assessment as a record of the considerations which you have given to this matter.

Actions to mitigate negative impact or enhance positive impact of the service change in terms of equality, social inclusion, and health considerations
The proposed changes to the housing allocations policy and scheme seek to ensure that all forms of social housing, this includes supported housing and low-cost home ownership

products, are allocated to those persons in the greatest housing need. Therefore, seeking to ensure equality of opportunity and social equality is promoted through access to suitable housing to allow people to be able to participate in society and to ensure the provision of suitable housing for people's health and support needs will improve people's quality of life and reduce admissions to hospital and residential care. By having a policy which covers allocations and nominations to all forms of social housing and introducing local connection and financial assessment qualification criteria for Bands 1 to 6, this should result in not just housing been allocated to those in greatest housing need, but also provide strong evidence of need and demand, which will greatly assist the Council and its partners to enhance the positive impact of the policy change through the enabling and delivery of additional social housing.

Actions to review and monitor the impact of the service change in terms of equality, social inclusion, and health considerations

The draft policy and scheme has been subject to public consultation which has resulted in changes to seek to better ensure social inclusion; if the final policy and scheme is agreed, part of the implementation process will involve contacting all existing applicants to advise them of the policy changes. Applicants who are no longer qualify for an allocation or feel that they have less priority than previously have a right of appeal. Following the implementation of the revised policy it will be subject to robust continuous monitoring, both in terms of allocations of Council owned stock and housing association compliance with nomination agreements, to ensure that those applicants in the greatest housing need are being allocated social housing and to seek to maximise positive outcomes across all Protected Characteristic groupings. In addition, as a minimum, there will be quarterly monitoring of housing demand as evidenced by the housing register, in terms of first choice parish and type and size of property. This data will be used to inform development and asset management plans, so as to ensure that new and existing social housing meets need and reflects aspirations.

Associated ESHIAs

An initial ESHIA was undertaken on the draft revised policy for consultation in March 2022.

Actions to mitigate negative impact, enhance positive impact, and review and monitor overall impacts in terms of any other considerations. This includes climate change considerations

Climate change

As the housing allocations policy and scheme is purely concerned with allocations and nominations for existing social housing stock a climate change appraisal is not relevant.

Health and well being


Being able to access an affordable dwelling which meets a household's needs is essential to health and well-being. For example, this could be an allocation of a flat in an extra care sheltered scheme to an older person with disabilities, allowing them to be able to continue to have "their own front door" and live independently instead of moving into residential care or potentially being admitted to hospital due to a fall. Or instead providing a house which is affordable, of good quality and has security of tenure to a family threatened with homelessness, allowing them to create a home for their children and reducing the worry of a no fault eviction or being able to afford an increase in rent.

Economic and societal/wider community

By ensuring that those in the greatest housing need are allocated social housing, the benefits are not limited to improving the individual health and wellbeing of those allocated housing but can be much wider. For example, the provision of affordable housing can result in some being able to escape the "benefits trap" and take a job as a

care assistant. Moreover, enabling someone with learning disabilities or autism to choose to live independently in supported housing, is essential to ensuring an inclusive society.

Scrutiny at Part One screening stage

People involved	Signatures	Date
<i>Lead officer carrying out the screening</i>		18 August 2022
<i>Any internal service area support*</i>		
<i>Any external support**</i>		

***This refers to other officers within the service area**

****This refers to support external to the service but within the Council, e.g., the Rurality and Equalities Specialist, the Feedback and Insight Team, performance data specialists, Climate Change specialists, and Public Health colleagues**

Sign off at Part One screening stage

Name	Signatures	Date
<i>Lead officer's name</i>		

Accountable officer's name

****This may either be the Head of Service or the lead officer***

B. Detailed Screening Assessment

Aims of the service change and description

The Council's existing allocation policy and scheme, "Shropshire Affordable Housing Allocation Policy and Scheme" was launched in 2014. This is a common housing register which uses choice-based lettings (CBL) to allocate all Council owned stock (managed by its Arm's Length Management Organisation, STAR Housing) and void dwellings from partner Private Registered Providers. However, since 2014 there has been a sharp increase in housing costs in the private sector, resulting in all forms of social housing, including supported accommodation and local cost home ownership products becoming a very scarce and important resource. It is now become vital that the Council ensures that those applicants in the greatest need are allocated social and affordable housing which in recent years, due to the increase in housing costs in the private sector, has become a very important resource. Moreover, the policy review has been influenced by the strategic need to:

- Prevent and tackle homelessness, including reducing the pressure on temporary accommodation;
- Promote independent living and reduce admissions to residential care, by ensuring the best use of all tenures and types of social housing; and
- Enable key workers on low incomes to be able to access affordable housing.

It is therefore proposed to move to a situation where the Council's policy is for allocations to the Housing Register; the allocation of the housing stock owned by the Council, which is managed by its Arm's Length Management Organisation (ALMO), Shropshire Towns and Rural (STAR) Housing; and nominations to housing associations registered with the Regulator of Social Housing (for social and affordable rented and low cost home ownership¹⁵ properties).

The CBL process would remain in place, but formal nominations arrangements would be introduced, with all large Private Registered Providers to require to agree to nomination rights to 100% of allocations to new build housing, with nominations to re-lets and all existing stock be agreed on an individual basis. It should be noted that the Housing Act 1996 refers to the need for Private Registered Providers to co-operate with local housing authorities to offer housing to people in priority need and who are homeless. In addition, Housing Corporation Regulatory Circular, 02/03 Regulation, February 2003 refers to nomination agreements between local authorities and housing associations (Private Registered Providers) and how these should be for a minimum of 50% void dwellings on re-let.

To ensure the Council is meeting local housing and support needs of those who are unable to meet their needs through the market, the draft policy contains qualification criteria relating to local connection, a financial assessment and unacceptable behaviour, whereby eligible applicants with a local connection and in housing need will be placed in Bands 1 to 6. Those eligible applicants without a local connection, subject to the below exceptions, will be placed in Band 7 (the lowest band).

With statutory exceptions relating to the Armed Forces, ex-service personnel and existing social tenants moving to employment in Shropshire, the proposed local connection is either residency (have lived in Shropshire for the last two years), close family living in Shropshire, or being employed in Shropshire. As the Local Housing Authority, the Council retains discretion to dis-apply the qualification criteria in exceptional circumstances.

¹⁵ With the exception of Homes England grant funded shared ownership properties on non-exception sites

It is proposed that applicants who would be able to purchase or rent market priced housing within Shropshire which is suitable for their needs would be placed in Band 7. The draft policy proposes that the threshold for being able to access accommodation in the open market is an income of £50,000 gross per annum or savings and assets (including equity in a property) of more than £200,000 or both. Where an applicant only wishes to access low cost home ownership housing the annual gross income is raised to £80,000.

Although the existing policy disqualifies persons on the grounds of unacceptable behaviour, this is based on a very stringent test. The draft revised policy recognises that there can be no blanket restrictions as each case needs to be considered on its merits, however, sets out a list of example scenarios where an applicant could be disqualified from an allocation of housing.

The draft policy also increases the number of bands from four to seven. Thus allowing for greater differentiation in prioritising categories of applicants are required to be given reasonable preference under the Housing Act 1996 and also recognising the needs of those applicants who may not be in a reasonable preference group but are still in housing need and are a strategic priority for the Council, for example, key workers in low-paid employment.

In addition, by the policy applying to all forms and tenures of social housing and introducing qualifying criteria relating to local connection and financial resources, this means that there is greater clarity on the evidence to support affordable and specialist housing development.

Intended audiences and target groups for the service change

The proposed changes to the allocations policy and scheme will affect applicants currently on the housing register and future applicants wishing to join. The local connection and

financial assessment qualification criteria will result in all those eligible applicants with a local connection and in housing need to be placed in Bands 1 to 6, with eligible applicants who are not in housing need or do not have a local connection being placed in Band 7. However, the revised scheme will encompass all forms of social housing, including supported housing and low-cost home ownership, so for all eligible applicants there is greater opportunity of being allocated housing.

In addition, moving from a common housing register to the Council facilitating allocations and nominations from a local authority housing register, will also change the way the Council works with housing associations into a more formal approach, with ongoing monitoring. However, this approach is considered a standard model for allocating social housing, especially in areas of scarce affordable housing and high housing need.

Elected Members are also likely to be affected by the proposed changes as they may be contacted by applicants.

Evidence used for screening of the service change

The evidence used for developing the proposed changes to the allocation policy and scheme includes: homelessness data (including the numbers of households in temporary accommodation); housing need and demand data from the existing housing register; housing market data; research on key workers; statutory guidance on social housing allocations for local housing authorities in England; good practice and feedback from the public consultation.

Specific consultation and engagement with intended audiences and target groups for the service change

The eight-week public consultation included formal consultation with all 32 Private Registered Providers operating in Shropshire and media publicity to raise awareness with Council tenants and existing and potential applicants.

Initial equality impact assessment by grouping (Initial health impact assessment is included below)

Please rate the impact that you perceive the service change is likely to have on a group, through stating this in the relevant column.

Please state if it is anticipated to be neutral (no impact) and add any extra notes that you think might be helpful for readers.

Protected Characteristic groupings and other groupings in Shropshire	High negative impact <i>Part Two ESIIA required</i>	High positive impact <i>Part One ESIIA required</i>	Medium positive or negative impact <i>Part One ESIIA required</i>	Low positive, negative, or neutral impact (please specify) <i>Part One ESIIA required</i>
<u>Age</u> (please include children, young people, young people leaving care, people of working age, older people. Some people may belong to more than one group e.g., a child or young person for whom there are safeguarding concerns e.g., an older person with disability)			✓	
<u>Disability</u> (please include mental health conditions and syndromes; hidden disabilities including autism and Crohn's disease; physical and			✓	

<p>sensory disabilities or impairments; learning disabilities; Multiple Sclerosis; cancer; and HIV)</p>				
<p><u>Gender re-assignment</u> (please include associated aspects: safety, caring responsibility, potential for bullying and harassment)</p>				✓
<p><u>Marriage and Civil Partnership</u> (please include associated aspects: caring responsibility, potential for bullying and harassment)</p>				✓
<p><u>Pregnancy and Maternity</u> (please include associated aspects: safety, caring responsibility, potential for bullying and harassment)</p>				✓
<p><u>Race</u> (please include ethnicity, nationality, culture,</p>				✓

language, Gypsy, Traveller)				
<u>Religion and belief</u> (please include Buddhism, Christianity, Hinduism, Islam, Jainism, Judaism, Nonconformists; Rastafarianism; Shinto, Sikhism, Taoism, Zoroastrianism, and any others)				✓
<u>Sex</u> (this can also be viewed as relating to gender. Please include associated aspects: safety, caring responsibility, potential for bullying and harassment)				✓
<u>Sexual Orientation</u> (please include associated aspects: safety; caring responsibility; potential for bullying and harassment)				✓

<p><u>Other: Social Inclusion</u> (please include families and friends with caring responsibilities; households in poverty; people for whom there are safeguarding concerns; people you consider to be vulnerable; people with health inequalities; refugees and asylum seekers; rural communities; veterans and serving members of the armed forces and their families)</p>			✓	
---	--	--	---	--

Initial health and wellbeing impact assessment by category

Please rate the impact that you perceive the service change is likely to have with regard to health and wellbeing, through stating this in the relevant column.

Please state if it is anticipated to be neutral (no impact) and add any extra notes that you think might be helpful for readers.

Health and wellbeing: individuals and communities in Shropshire	High negative impact <i>Part Two HIA required</i>	High positive impact	Medium positive or negative impact	Low positive negative or neutral impact (please specify)

<p>Will the proposal have a <i>direct impact</i> on an individual's health, mental health and wellbeing?</p> <p>For example, would it cause ill health, affecting social inclusion, independence and participation?</p> <p>.</p>			✓	
<p>Will the proposal <i>indirectly impact</i> an individual's ability to improve their own health and wellbeing?</p> <p>For example, will it affect their ability to be physically active, choose healthy food, reduce drinking and smoking?</p> <p>.</p>			✓	
<p>Will the policy have a <i>direct impact</i> on the community - social, economic and environmental</p>				✓

<p>living conditions that would impact health?</p> <p>For example, would it affect housing, transport, child development, education, employment opportunities, availability of green space or climate change mitigation?</p> <p>.</p>				
<p>Will there be a likely change in demand for or access to health and social care services?</p> <p>For example: Primary Care, Hospital Care, Community Services, Mental Health, Local Authority services including Social Services?</p> <p>.</p>			✓	

Identification of likely impact of the service change in terms of other considerations including climate change and economic or societal impacts

As the housing allocations policy and scheme is purely concerned with allocations and nominations for existing social housing stock a climate change appraisal is not relevant.

With respect to the Human Rights Act, this does not give a person a right to a home or other accommodation, instead it contains a right to respect for a home that a person already has. The Housing Act 1996 and the associated statutory guidance on social housing allocations for local authorities in England sets out the legal framework for the Council to establish its allocation policy and scheme. The Council must comply with the Housing Act 1996, even if the statute appears to infringe the Human Rights Act, for example in terms of eligibility. However, the operation of allocation schemes must avoid unjustified discrimination (which may be contrary to Article 14 of the Human Rights Act) and procedural unfairness (which may be contrary to Article 6 of the Act). The revised draft allocations policy and scheme has been considered in terms of this, and advice and assistance, including assisted bidding is provided to ensure all persons are able to apply to the scheme and applicants are able to submit bids.

With respect to the public sector equality duty, through ensuring those applicants in the greatest housing need are allocated social housing the draft revised policy seeks to promote social inclusion.

Appendix III: Summary of consultation feedback

The draft allocations policy and scheme was subject to public consultation over the period 9 May 2022 to 3 July 2022. This included the draft being sent to all Private Registered Providers (housing associations registered with the Regulator of Social Housing), elected Members and Parish and Town Councils.

Responses were received by three Private Registered Providers, five elected Members, 11 Town and Parish Councils, three other external bodies, one member of the public and five members of staff. A summary of comments is set out below:

Element of policy	Feedback	Consideration
<i>Local connection</i>	<ul style="list-style-type: none"> • In the main supported, with suggestion that the residency element increase to three years, however, the following concerns raised: <ul style="list-style-type: none"> ○ Would lead to struggling to allocate difficult to lets. ○ Persons with support networks not being able to prove a local connection. ○ Care leavers placed out of county potentially not having a local connection. ○ Homeless households without a local connection not being accepted onto the register. ○ Refugees and former prisoners not being accepted onto the register. ○ Key workers to include care workers. 	<ul style="list-style-type: none"> • The residency element of the revised policy increased to two years as this is Government policy recommendation. • Band 7 widened to include all eligible applicants regardless of local connection. • The draft policy provides for discretion in terms of how the local connection qualification criteria will be applied. • Policy amended to state that where the Council is corporate parent of care leaver placed out of county the care leaver will have a local connection. • The proposed residency qualification can apply to applicants in the reasonable preference category (all homeless households) on the basis that the Council exercises discretion where appropriate, acts proportionately and does not result in a whole group of people in the reasonable preference category being excluded. Therefore, where it is appropriate the Council (Head of Housing) should use discretion to accept homeless applicants onto the housing register. • An appendix has been included which sets out all the key worker professions, this includes care workers.

<p><i>Financial qualification</i></p>	<ul style="list-style-type: none"> • How to evidence a household is able to afford open market housing. • Should be reviewed annually and means tested relating to make-up of the household • Too high as: <ul style="list-style-type: none"> ○ Should be based on the average wage. ○ Prevents those in most housing need from accessing accommodation. • Too low as: <ul style="list-style-type: none"> ○ Prevents adult children from living at home and being able to save up. ○ Appropriateness of including all household income (non-dependent children) ○ Prevents people from being able to live in the area they have been brought up. ○ Does not take account of local housing markets. ○ May result in housing associations struggling to let / sell some social housing. 	<ul style="list-style-type: none"> • Procedure will be based on financial qualification contained in policy. Therefore, will have regard to the financial resources of the applicant and cost and availability of alternative suitable accommodation. • Draft policy now states that it is to be reviewed annually. • On the basis that this threshold is for families as well as single persons, the average income is considered too low. • Social rented housing is for households in housing need and those on over £50,000 per annum could afford to rent on the open market in Shropshire. • The threshold for those households only wishing to access low-cost home ownership raised to £80,000 gross per year. • Band 7 widened to include all eligible applicants regardless of household income.
---------------------------------------	--	--

	<ul style="list-style-type: none"> • Consideration should be given to those with finances above limit but specific medical/ support need. 	<ul style="list-style-type: none"> • The policy already considers this in the financial and needs assessment.
<p><i>Banding</i></p>	<ul style="list-style-type: none"> • Section 17.2 'Bidder in highest band' – feels this conflicts with the policy aims • Addition of bandings from 4-7 – interesting to see how many applicants are re-housed in bands 5-7 after a period of time. • Could we work on what a 'support package' offer might look like to move care leavers to Band 2 or can we ask for a new Band 1C for 1st time care leaver applicants at 18? • Joint applications – this is unnecessary and excludes friends – felt we should be supporting strong networks and exclusion of friendship was an over policing of people's lives. • Wish to have joint applications from friends, particularly those below 25 • Band 6 -is assessment for everyone or just those with income above £50k. 	<ul style="list-style-type: none"> • To be dealt with in nominations agreement. Options for Local Lettings Plans remain, subject to agreement with Council. • To be reviewed periodically. • Currently first-time care leavers are in Band 2, this being "planned" rehousing. Care leavers could also be in Band 1 (A or B) if statutory homeless. • Wording revised. • Wording revised. • The original draft proposed that Band 6 was for everyone accepted onto the register, who did not meet the criteria for Bands 1 to 5. However, under the revised draft policy it will contain eligible

		<p>applicants who have both a local connection and financial qualification, but do not meet the criteria for Bands 1 to 5.</p>
<p><i>Supported and Specialist Housing Need</i></p>	<ul style="list-style-type: none"> • There are client groups likely to be negatively impacted by the policy e.g. working age people with disabilities, offenders on discharge (on this there is a lack of clarity on place detention and prior place of residence). • Does policy apply to Retirement Living and Extra Care. • Section 19.1 Extra Care. The Policy refers to extra care applicants as needing to be referred by a social care manager, ruling out those without care needs, which will create difficulty maintaining a balanced community of care needs. • Concern that care leavers placed out of county will not qualify to be on the register due to local connection requirement. • No mention of people with autism who may have particular housing needs • Need to consider needs of women offenders, sometimes 	<ul style="list-style-type: none"> • Equalities Impact Assessment Completed. • Yes. • Extra care sheltered housing is designed for persons with low, medium and high care and support needs as it should be an alternative to residential care and also prevent admissions to residential care. A mixture of low, medium and high care and support needs should ensure a balanced community and can be subject to an agreed local lettings plan. • Care leavers who have been placed in Shropshire by other local authorities for longer than two years before they are 18 automatically have local connection under Homeless Legislation. • To be covered in procedures. • To be covered in procedures.

	<p>with specific adaptations and/or learning disabilities.</p> <ul style="list-style-type: none"> • Request policy to contain a specific reference to rehousing prison leavers and those on probation. • Queried need to former members of armed forces with urgent housing needs additional priority. • Adapted properties – clarify that need for specific adapted property gives priority. 	<ul style="list-style-type: none"> • Agreed. Will need to relate to a protocol. • This is a Statutory Requirement • To be clarified in procedures
<p><i>Administration of the Scheme</i></p>	<ul style="list-style-type: none"> • Policy does not refer to nominations % Implies all RP properties to be let via the scheme. • The Policy doesn't refer to landlord pre-tenancy assessments. • Landlords need ability to make best use of stock. • Can advertising cycles for new build be reduced. • Section 4.8 Exclusions. No detail regarding applicants who are abusive to staff. • Section 4.7 to 4.10 – useful to include detail regarding process for checks. Also, helpful if exclusion reviews 	<ul style="list-style-type: none"> • The Policy relates to allocations for council owned stock and nominations to housing associations. % of nominations to be agreed as part of Nominations Agreements. • As above. • Can be agreed as part of Nominations Agreements. • As above. • Would be considered under proven unacceptable behaviour (section 4.8). • N/A as checks in respect of eligibility to the scheme carried out by Council.

	<p>were documented on individual applications</p> <ul style="list-style-type: none"> • Policy doesn't give detail of who responsible for checking detail regarding financial needs assessment. • Welcome discussion around current approach on auto bids • Section 26.1 would welcome further discussion around properties which aren't available for lettings being advertised. • Section 28.1 The Policy refers to three working days wait for applicants to respond to offers of accommodation. Can this be reduced • Section 28.1 clarity on whether statutory duty applicants can refuse offers without having duty discharged • The Policy doesn't give detail regarding who will be responsible for applicant right to rent checks • Would like to explore "pausing" applications for two-month period if applicant does not pass landlord pre-tenancy checks 	<ul style="list-style-type: none"> • The Council with exception of LCHO • This relates to Council properties. • Three days to remain, as need to be mindful of applicants' needs. • The only grounds for refusal and another offer being made is if the other offer is considered unsuitable. • Right to Rent checks do not apply to allocations of council housing and nominations to housing associations as these are made under the Housing Act 1996 and eligibility will need to be assessed by the Council in line with the Act. • This is a Council Allocation Policy and Scheme.
--	---	--

	<ul style="list-style-type: none"> • Applicants only provided 1 bid per advert cycle – we would like to see this increased to 3 to give customers a better choice in advert cycle. • Whether those unable to access the appropriate technology will be adequately catered for in the notification process. • Issues relating to content of advert, timescales, not understanding autism • Is there a risk of digital exclusion. • Is it possible for people on the register to nominate Shropshire Councillors to act as proxy on their behalf. • Can Social Care workers be included as key workers. • Applicants to be able to make two bids (not restricted to one). • Can housing associations also have sensitive lets. • Can the Band 2 – 8 week review period be extended as given the current pressures on both staff and the housing stock? 	<ul style="list-style-type: none"> • Not currently possible. • Paper copies of the application form are available and an assisted bidding service is offered. • Matter to be covered off in procedures. • To be explored further with colleagues as part of procedures. • Included in the Appendix. • Not currently possible. • Agreed, draft policy amended. • Agreed, draft policy amended.
<p><i>General Comment</i></p>	<ul style="list-style-type: none"> • Bedroom entitlement now in line with DWP. 	

	<ul style="list-style-type: none">• Section 30.2 & 30.3 seem to contradict each other.• Concern about lack of housing in the South of the county.• Aggressive and negative set of rules, maybe to dissuade people, policy list barriers.• The policy is not really fit for purpose in its current form and would strongly recommend more in-depth consideration before adoption.	<ul style="list-style-type: none">• This is the reason for the section 30.3 (whereas section 30.2 is required for couples). Subsequently, this section has been amended (see above comment on joint tenancies).• Social/ Affordable Housing is a valuable and scarce social resource, the allocation to which has to be governed through a robust and transparent framework.• The revised draft policy not contains a contents page. In addition, the draft policy had been considered by Counsel as complying with housing legislation and statutory guidance.
--	---	---