

Referrals and Allocations Policy

Consultation Overview

Introduction

Within Home Group we have a range of policies which set out our overall approach to providing services and the standards we work to.

We actively support both internal and external individuals to get involved in developing, reviewing and approving our policies in a variety of ways, including the online community, local groups and national forums.

This report sets out how we have involved colleagues, customers (supported and rented), applicants and key stakeholders in the development of our revised Referrals and Allocations Policy.

Policy Overview

This policy sets out Home Group's approach to referrals and the allocation of housing (including internal transfers) and garages. This includes Care Quality Commission Registered Services and agency managed services.

Consultation Method

We have provided a range of channels to enable individuals to influence the policy, taking a predominantly digital first approach in line with our new strategy. The summary below highlights the consultation undertaken along with the audience involved.

Audience	Channel	Aim
Colleagues	Survey Monkey	Enable colleagues from across the business to comment on the key policy changes and the new policy standards.
Customers (rented and supported)	Survey Monkey	Enable customers to comment on the key policy changes and the new policy standards.
Applicants	Survey Monkey	Enable applicants to comment on the key policy changes and the new policy standards.
Stakeholders	Survey Monkey	Enable stakeholders to comment on the key policy changes and the new policy standards.
Protected Groups	Human Library (involved group)	Ensure the key changes and the new policy standards are fit for purpose and meet the needs of protected groups.
Customers (rented)	View Point Team (involved group)	Enable involved customers to comment on the key policy changes and the new policy standards.
Customers (supported)	1:1s/ House Meetings	Enable supported customers to comment on the key policy changes and the new policy standards.

247 individuals took part in this consultation in some format, and provided a variety of feedback for our consideration. This can be broken down into the following categories:

Consultation Channel	No. of respondents
Survey Monkey	159
Involvement Groups	13
Face to Face consultation	75

Findings

In order to summarise the findings, each question will be considered separately. Some of the responses can be quantified into set amounts, however in some cases this is not possible as the responses were part of group discussions rather than individual answers.

The following questions were asked to all respondents, apart from the Human Library who were asked specific questions relating directly to equality, diversity and inclusion.

Do you have any comments on the key policy changes?

Do the policy standards cover everything you would expect them to?

Are the standards clear and understandable?

Do you think the policy promotes equality and diversity?

Are there any other comments you would like to make in relation to this policy?

The Human Library were asked the following:

Do you think any of our suggested changes will negatively impact on any protected groups?

Do you think our policy promotes equality and diversity? If not, how could the policy be improved to address this?

Do you have any comments on the key policy changes?

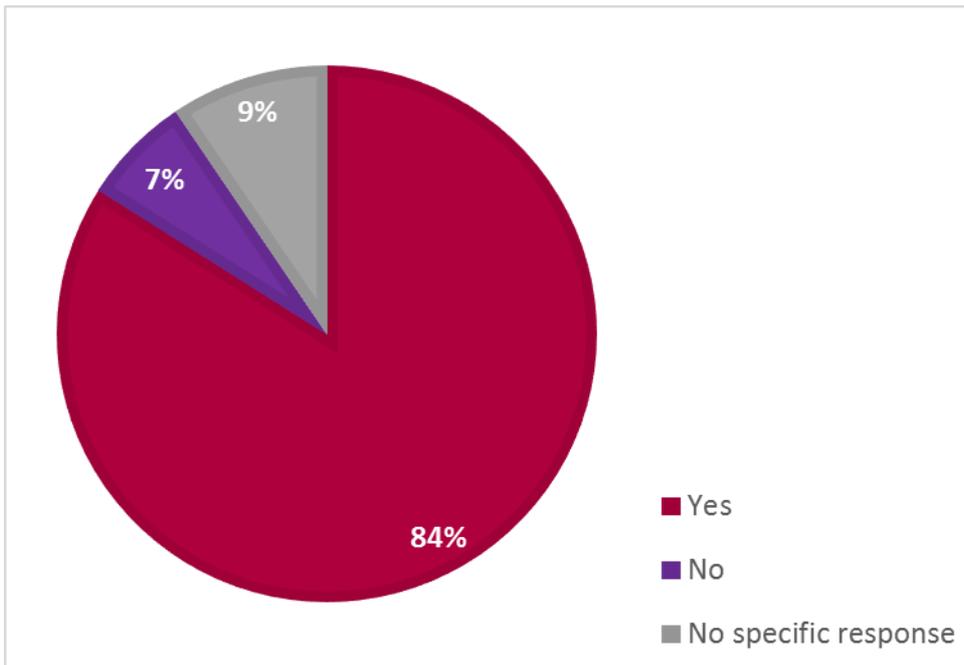
We received **55** specific comments on the key policy changes, these comments can be broadly split into the following themes:

- 3 reasonable offers restriction
- Home ownership restriction
- Affordability assessment
- General comments

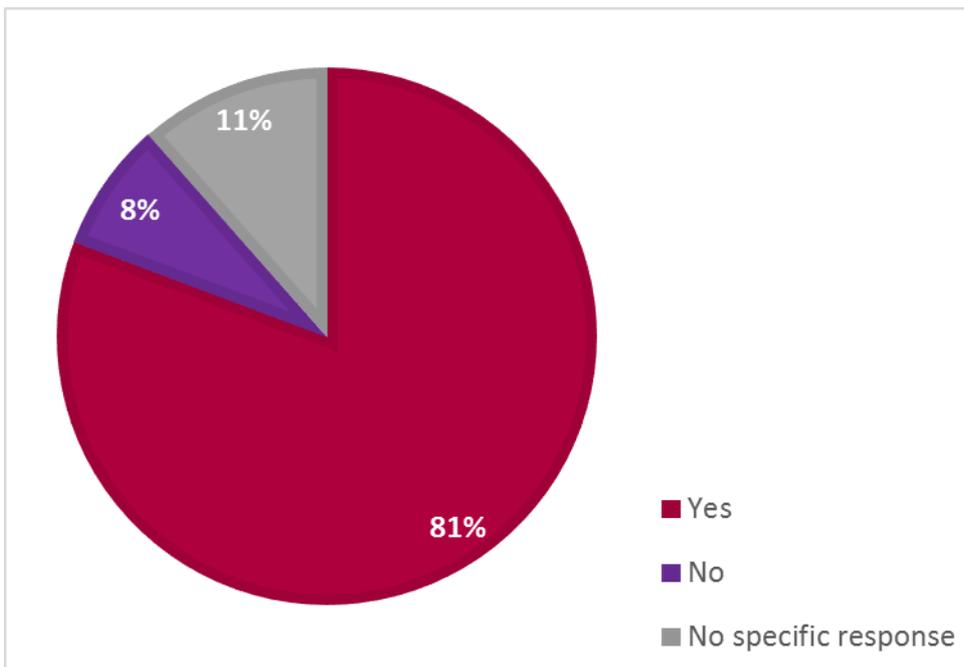
The response received to the key policy changes was generally positive, however some aspects were questioned by some respondents, generally suggesting that more detail is required. The diagrams below highlight a summary of the feedback.

Do the policy standards cover everything you would expect them to?

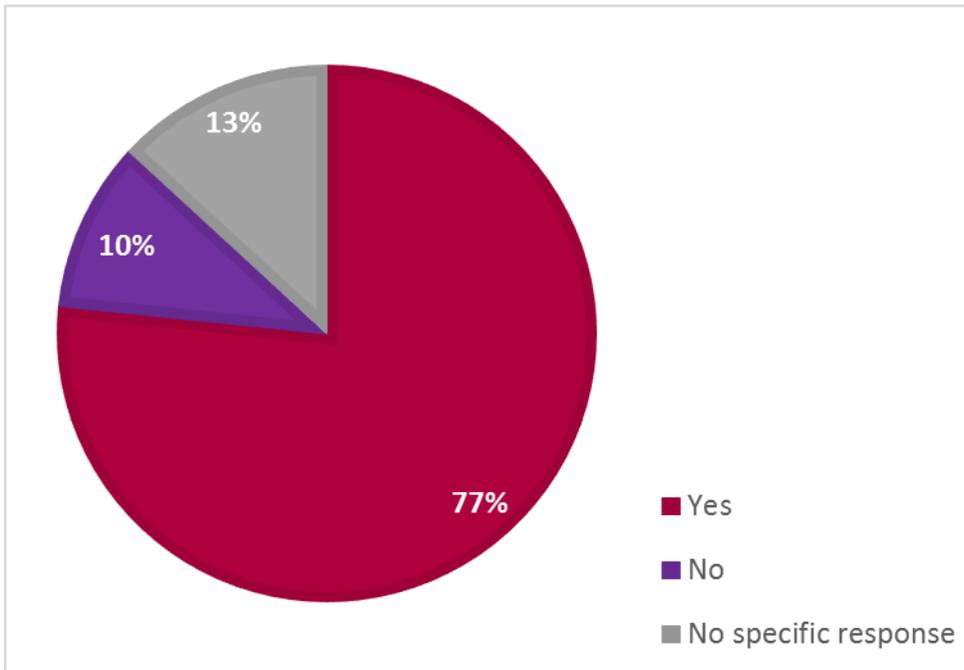
The responses from this question can be broadly quantified into the following:



Are the standards clear and understandable?



Do you think the policy promotes equality and diversity?



Are there any other comments you would like to make in relation to this policy?

We received approximately **29** further comments in relation to this policy area. These comments varied in content and some specifically relate to areas outside of the policy. The impact table below highlights how some of these comments have been used.

Impact of Consultation

Our internal project team have reviewed all of the responses received through our consultation and considered what changes we are able to make to the policy in response. Unfortunately we are not able to make all of the changes suggested as we are required to comply with legislation, regulation and business priorities, however we hope this summary below will answer some of the questions and respond to the comments received.

You said summary	“Quotes”	We did
<p>Restricting Homeowners</p> <p>The majority of respondents were happy with this policy stance, however we did receive some points for consideration:</p> <ul style="list-style-type: none"> • What if the applicant is in financial hardship? • Will the restrictions be seen as loopholes? • Distinguish between holiday homes and caravans • What about needing to move for welfare reasons? • Consider the nomination agreements in place. 	<p><i>“We also agree that preventing homeowners from accessing social housing (aside from the exemptions) is a reasonable decision, as they should be able to afford their own housing if they wish to move.”</i></p> <p><i>“I agree that home owners should be excluded apart from in exceptional circumstances.”</i></p> <p><i>“The exceptions rule for home owners applying is consistent with many Allocations schemes and make sense”</i></p> <p><i>“I can understand the reason for reducing eligibility for home owners, although home ownership does not always equate to equity.”</i></p> <p><i>“I was unclear about the point on home ownership for those with a medical need or at risk of abuse or harm. I fully appreciate a need to move to a suitable property where there is a medical or health need or a person’s safety but I can see that this may be used as a loophole by some and allow for an individual to rent out a previous property whilst renting one from Home Group”.</i></p> <p><i>“Many people own caravans which are on holiday caravan sites - these could be classified as "residential" but the site conditions dictate that they cannot be permanently occupied they are "holiday" homes. I think you should distinguish between holiday homes and residential caravans”</i></p>	<p>We have kept in our stance on homeowners in our new policy however we are going to consider some of the restrictions in our guidance for colleagues to ensure compliance with the policy.</p> <p>We have amended our stance to caravans to indicate that this will not be a definite rejection, we would look into the case and consider it on its merits, and distinguish between static and mobile caravans.</p> <p>Customers will be required to provide evidence if they believe they meet our criteria for accommodation i.e. if a homeowner requires to move into our accommodation for medical reasons we will ensure we are provided with the correct evidence prior to doing so to ensure this does not become a loophole.</p> <p>Our policy position is clear in terms of our relationship with local authorities and the contractual agreements we have in place with regards to the allocation of our properties. We will continue to monitor the arrangements we have in place to ensure compliance.</p>

“Maybe to reconsider your position on those residing in caravans. Unless you relating to dwellings like those at the Billing which are already homeley. Otherwise the policies are well drafted...”

“Home owners in financial difficulty who are unable to afford their property and are taking steps to dispose of their property would be able to apply under most allocation schemes (subject to capital restrictions after sale). The policy as described here does not seem to take account of this group being able to apply?”

“Exceptions for home owners disqualified from social housing should extend from medical reasons to include welfare linked reasons e.g. current home may be suitable medically but they need to move to receive support from family/carers and not doing so would mean they are unable to continue living independently, even though the current home may be suitable (i.e. adapted). Where exceptions are also made as part of a local lettings plan, I think it should be made clear that this would include section 106 agreements on developments (not just Home's own LLPs) where a local connection supersedes all other requirement (subject to the other criteria that may be stated, as you have mentioned). Clarification needs to be included for applicants fleeing DV where they may be leaving the family owned home but it is not suitable/appropriate to ask that the home be sold and/or that the victim remain.”

“A number of older people own their own home which they need to sell or move on to alternative and more suitable accommodation, this policy may restrict these people in particular”

	<p><i>“Home ownership ship should not come into context as home maybe up for sale for some time and desperate to move into suitable accommodation”</i></p>	
<p>Affordability Checks</p> <ul style="list-style-type: none"> • Our stance on affordability checks received positive comments, however it was generally felt that more detail was required on this. • Consider adding in exceptions to this check 	<p><i>“A very positive change to incorporate affordability checks up front, as this avoids problems in the future”</i></p> <p><i>“Affordability - needs to be greater information on this in terms of income levels and assets held”</i></p> <p><i>“Affordable assessment criteria levels needs to be flexible to give the tenant the opportunity to prove they can sustain a tenancy.”</i></p> <p><i>“Affordability assessments need to take account of low income households and higher 'affordable' rents. Home Group should not be discriminating against households and refusing them for affordable housing. These households have not got other options and are often already homeless due to affordability from the PRS. Affordability policies need to ensure households are not refused, but flags up a financial concern and support provided to maximise the household income, e.g. by working towards employment for 16 hours. LAs agree that RP affordability policies are a conflict of their status as providers of affordable housing for the most vulnerable families.”</i></p> <p><i>“The recent changes to our local authority policy regarding affordability, allowed for exceptions to be made on pregnancy, carers, medical need requiring separate bedroom for couples and fostering families. I think all steps should be taken to ensure that assistance and maximising of income is carried out to ensure families can afford larger homes</i></p>	<p>Prior to any offer of accommodation being confirmed, we must carry out an affordability check to confirm the applicant can afford and sustain the tenancy in question.</p> <p>Our internal guidance will highlight how we will check affordability, and the steps we will take to support the customer.</p> <p>We are taking these steps in order to support potential customers in tenancy sustainment. This model will enable applicants to understand what type of property is affordable based on current circumstances.</p>

	<p><i>where required (not necessarily by what the HB/LHA rates would cover at first instance), rather than just referring to Home's own business needs"</i></p>	
<p>3 Reasonable Offers</p> <p>The majority of respondents were happy with this policy stance, however we did receive some points for consideration:</p> <ul style="list-style-type: none"> • Is 3 a reasonable amount of offers? • Describe what is meant by a reasonable offer 	<p><i>"Good to have a clear understanding as how many applications are reasonable- good it identifies 3"</i></p> <p><i>"Agree with 3 refusals only, as properties are to be allocated dependent on need (not desire)"</i></p> <p><i>"Positive - that reduced preference will be given to those who refuse suitable offers of accommodation"</i></p> <p><i>"Choice is important and 3 offers represents good choice for the customer"</i></p> <p><i>"In addition, penalising multiple refusals is seen as a positive change, as long as the reasons for refusal are considered on a case by case basis and only unreasonable ones are penalized"</i></p> <p><i>"Some of your key policy changes are similar to what we introduced last year. We give applicants one reasonable offer of accommodation. If they make an unreasonable refusal they are removed from the housing register"</i></p> <p><i>"It is healthy to have a cut-off point"</i></p> <p><i>"I don't agree that an applicants' priority should be reduced if they refuse 3 properties. If they refuse a property, I think a discussion should be had as to why they have refused and then their requirements updated accordingly. Applicants are looking for somewhere to settle and I think it might reduce levels of tenancy sustainment if people accept</i></p>	<p>We are going to move forward with the idea of 3 reasonable offers for direct applicants, before decreasing an applicant's priority. We have made it clearer in the policy that this applies to direct applicants only. This cut of point will ensure that housing is going to those applicants who are in need and will decrease waiting lists.</p> <p>Following each refusal by the applicant our Housing Managers/ Support Workers will discuss the options available to ensure the follow up offers are more suitable, rather than penalising the applicant without discussion.</p> <p>We will define what we mean by 'reasonable' in our internal guidance to ensure colleagues are assessing each request in a fair and consistent way.</p>

properties they don't really want because they are worried they won't get any further offers"

"you shouldn't be penalised if you have refused accommodation however many times if it is unsuitable for your needs"

"3 attempts to gain a property not enough and should be unlimited attempts circumstances could change over time"

"I think priority shouldn't be reduced and should give customers more chance as sometimes the area isn't suitable or enough information isn't provided to client to take the property"

"Is 3 reasonable offers too many?"

"Reasonable offers, I think it may be helpful to mention what constitutes a reasonable offer, either directly stating it or refer to a leaflet or something that can be altered more easily than a policy. The issue being that the word reasonable could be argued."

"Whilst understanding large RP and working in a number of boroughs, is there flexibility to be compliant with local practices if the Home Group Policy contradicts local Council Allocation scheme - e.g. 3 offers then suspended however local suspension may be after 2"

"It needs to be made clearer that our policy of 3 reasonable offers refers to direct applicants only, LA have a similar policy already"

<p>Move on Customers Priority</p> <ul style="list-style-type: none"> • This was not a great concern for those involved in the consultation, however we did receive a few comments for consideration 	<p><i>“Clear up what is meant by ‘ultimate’ priority”</i></p> <p><i>“I don't think giving priority to Home Group clients promotes equality as someone who is not our client might have a greater housing need, yet if I'm reading draft policy standard 5 correctly, our client would get an offer of housing first”</i></p> <p><i>“No I disagree as you are putting the less priority people first”</i></p>	<p>Home Group have made the decision to give customers who move on from our supported accommodation the highest priority in line with our new strategy of building homes, independence and aspirations. We have changed the terminology from ‘ultimate’ to ‘highest’ to make this clearer.</p> <p>Promoting movement into independent living will also ultimately increase availability of supported housing.</p> <p>Internal guidance will support colleagues in managing this.</p>
<p>Clear and Understandable</p> <ul style="list-style-type: none"> • some of the standards are too long • it is confusing which sections apply to who • hard to distinguish between supported and rented requirements 	<p><i>“Could be simplified further for customers”</i></p> <p><i>“I think that it may be better to split the Scotland and England differences in the standards, rather than having a paragraph making a statement and then referring on another paragraph what Scotland does as I read it, that this is what we can offer overall.</i></p> <p><i>“Looks like this would refer to social housing not supported housing”</i></p> <p><i>“I can understand them, but they don't meet easy read standards.”</i></p> <p><i>“You could write a "lay summary" of your proposals - there isn't enough simple description in your proposals.”</i></p> <p><i>“Some of the standards are a bit long”</i></p> <p><i>“A summary would be useful”</i></p>	<p>We have tried to improve our policy to make it clearer for the reader, we have made the following amendments:</p> <ul style="list-style-type: none"> • We have split out the differences between Scotland and England where applicable to highlight the different ways of working • We have split out the differences between supported and rented allocations where appropriate • We have made it clear where aspects only apply to direct applicants <p>In addition to this, we will produce a summary statement to be placed on the internet which will be analysed and approved by the KISS involvement group (Keep is Short and Simple). Customer leaflets will also be reviewed and published which will provide easy read versions of some of the key aspects for customers.</p>

	<p><i>“a bit hard going for older people to understand”</i></p> <p><i>“Some people, especially older ones may have difficulty understanding some of the more jargon words. These may require detailed explanation during an interview to avoid confusion, and a better and clearer understanding of the policy overall.”</i></p> <p><i>“A bit difficult to follow”</i></p> <p><i>“I feel as though a lot of the key policy changes seem to refer to our waiting list and implies that (in section 5 particularly), that we can allocate homes. It does say that there are other allocation arrangements but as the initial statement it says that homes are allocated...and we give reasonable preference implies that we have a lot of control when in reality, we have signed up to CBL or LA agreements so we cannot allocate our own homes or give preference to anyone.”</i></p> <p><i>“it is very easy to understand”</i></p> <p><i>“Quite clear and concise”</i></p> <p><i>“Very clear and appropriate”</i></p> <p><i>“Yes, but the detail relating to the local area will need to be provided as it is very generic”</i></p>	
<p><u>Equality and Diversity</u></p> <ul style="list-style-type: none"> • Include reference to legislation and internal policies on the subject • Consider how we use housing for specific needs 	<p><i>“There could be more direct reference to our equality and diversity policy and our position on tackling discrimination. Is it also worth adding something on our approach to allocating properties that are specifically designated to meet particular needs e.g. a bungalow adapted for a person with a disability or housing for the elderly. Something</i></p>	<p>Although we have not created a separate equality standard, we have incorporated some changes throughout to align with the feedback received.</p> <p>We have updated our policy to make reference to our internal Equality, Diversity and Inclusion Policy alongside the Equality Act 2010 and the Accessible Information Standard.</p>

about making best use of our assets”

“Equality and Diversity, Health and Safety etc... are not explicitly mentioned, but are implied. May we suggest that a reference to other policies and legislation, such as Equality and Diversity, Health and Safety etc. is mentioned as part of standards?”

“Also "Access to housing" does seem to indicate a consideration for other languages, communication formats etc.... to address Equalities and Diversity issues. However, we would ask though that reference be made to reasonable considerations that have / will be taken to ensure people’s access to Housing is not impaired. E.g. if they are physically disabled, are housing offices DDA compliant, do your websites have a range of languages etc.....?”

“In relation to adapted properties / homes that are designed to life time home or equivalent, is there any prioritisation of these units for disabled clients, clients with a specific disability / need? We would assume that these issues would be considered, but there does not appear to be a reference to it in the "allocating properties" section. By considering this issue and future proofing properties (that supports allocations) we feel it would also support "value for money" standard”

“It does say that we will refer, use risk assessments, use different languages, etc but I wonder if E&D should be in a different standard so that its clearer what a potential customer can expect from us?”

“it carries misleading statements”

We actively support applicants through the application process where required and make every effort to communicate in formats and languages they prefer to ensure access is not impaired.

We have added in reference to making best use of our assets ‘We will also, wherever possible make the best use of our assets, ensuring that properties designed to meet particular needs are allocated appropriately’.

	<p><i>"It acknowledges but does not promote"</i></p> <p><i>"Couldn't see any section that made me think this has been done to secure / increase diversity"</i></p> <p><i>"Because I don't understand what you mean by "equality & diversity" in this context. I feel this phrase is "corporate speak"</i></p> <p><i>"Issue over age and benefit changes for young people presents mitigation requirements which are not explained"</i></p> <p><i>"Discriminatory against young people in receipt of benefits and lone parents with children - particularly women and disabled applicants who have limited opportunities to return to work"</i></p> <p><i>"The content does not reference it, so I don't how it can be said to promote equality or diversity"</i></p> <p><i>"it would appear that the changes would not significantly impact on e&d issues"</i></p> <p><i>"Yes, but there should be a reference to: The Accessible Information Standard (SCCI1605) Overview/scope"</i></p>	
<p>Gaps</p> <ul style="list-style-type: none"> • Application 	<p><i>"At present applicants for housing cannot complete and submit an application via our website. If this was available applicants could apply to us more easily."</i></p> <p><i>"To be able to contact your housing officer on telephone to discuss application at the moment to can only contact the call centre and they have to send email to housing office which can take a week before they can talk to you"</i></p>	<p>This amendment is not in scope of the policy review, however we will consider the points as part of the wider review of the supporting resources.</p>

<ul style="list-style-type: none"> • Welfare reform implications 	<p><i>“Age in which children of opposite sex have to share a room until should be looked at as the age of 10 in the day and age is quiet high considering social an economic policies and practices!”</i></p> <p><i>“Should special recognition be given to Universal Credit and how this will be managed?”</i></p>	<p>Implications of welfare reform are being considered as part of a standalone project to ensure all aspects are covered in depth. Comprehensive guidance will be provided to colleagues on how to manage any negative implications.</p>
<ul style="list-style-type: none"> • Hard to let units 	<p><i>“Little reference is made to how to allocate hard to let units - increasingly not poor quality units but units being rented at affordable rent levels, especially in the smaller bedroom sizes, with the introduction of a new benefit cap and move to Universal Credit. We are seeing an increase in RP 1 beds at affordable rent levels not being allocated quickly, as the affordability rules and incomes required are not those on the local Housing Register, which in essence means that those being housed are not those the Council defines as being housing need, so failing to meet local strategic housing priorities. Whilst the funding for new housing is understood and increasingly relets being passed from social to affordable rent levels, the risk is that certain RPs will be locally positive in terms of meeting housing needs, and this could impact future developments and partnership working. No mention of young people being potentially excluded from lettings”</i></p>	<p>We will develop internal guidance relating to hard to let properties to support colleagues. Local lettings plans will capture some of this information.</p>

<ul style="list-style-type: none"> • Use of properties 	<p><i>“Standard 7 could be expanded further to describe how we may agree to an internal transfer for management reasons e.g. rehousing a victim of harassment, which would effectively limit housing available for nominations etc.”</i></p> <p><i>“I would prefer to see greater clarity surrounding how you would establish the need for supported accommodation and how it would be ensured that the purpose of the accommodation can be maintained”</i></p>	<p>We have updated the policy standard to explain that we may agree to an internal transfer for management reasons. Details of when we may agree to this will be detailed in internal guidance for colleagues.</p>
<ul style="list-style-type: none"> • Local details/ Existing Partnerships 	<p><i>“Yes, but Is there more local detail relating to the service provided in the area where the contract is delivered?”</i></p> <p><i>“Local Lettings Plans need to take note of the Local Authority Allocation Scheme requirements”</i></p> <p><i>“As above, there should be reference to local policies”</i></p> <p><i>“It has not been clarified how you would be able to operate a single policy if you are working within an existing partnership”</i></p> <p><i>“We welcome the opportunity to consider the changes to the allocation policy. We recognise that allocations and referrals are complex matters and an organisation such as Home Group has a difficult job in balancing its own policy against the policies of the various local authorities in which it operates. That being said we would welcome some reference in the allocation policy to working with local authorities to resolve policy differences to ensure that households are not unnecessarily delayed or prevented from accessing accommodation through the allocation policy”</i></p>	<p>We have added the following into the policy <i>‘Any contractual arrangements must be considered alongside this criteria; this policy does not affect or refute any nomination agreement or lettings arrangement entered into with Local Authorities in the areas in which we operate’</i></p> <p>It is evidenced in the policy that the policy should be used with the associated policy in practice documents, group wide standard operating procedures and local procedures (supported services only).</p>

<ul style="list-style-type: none"> • Priority banding 	<p><i>“Priority to those with medical needs that need to live closer to family or hospitals”</i></p>	<p>We will consider any movements in our banding system as part of the review of our supporting resources. The banding system reflects housing need and therefore it is important we consider all banding opportunities.</p>
<ul style="list-style-type: none"> • Timescales/ Processes 	<p><i>“I think applicants should be kept updated on their application”</i></p> <p><i>“Do you have timescales for your processes - such as dealing with nominations from Local Authorities? Do you have a charter in place which ensures allocations are made in a timely manner?”</i></p> <p><i>“Standard 9 Appeals & Complaints procedure, it states it exists but doesn't explain how you complain. We usually just refer people to our website, but do not give the direct link as this can change. Appeals - might be helpful in explaining how to appeal, how to do it, and time scale, in ours you may only appeal within 21 days”</i></p>	<p>Our internal procedures set out the steps to take in allocating a property, we will review our waiting list and contact applicants in line with our internal procedures. Due to the various allocations routes, we are unable to discuss position on the waiting list with applicants, however we will aim to manage the expectations of the customer from the outset.</p> <p>Details of how to make a complaint can be found on our website, and our appeals process will be published for customer to access.</p>
<ul style="list-style-type: none"> • Format 	<p><i>“The referral and allocations Policy standards does not indicate a review date, nor how this will be updated, consulted upon etc.... Please could you consider these issues?”</i></p> <p><i>“And they are sufficiently broad to allow the exercise of discretion and to ensure customers can be assessed on an individual, case-by-case basis”</i></p> <p><i>“I feel the policy is reasonable and fair”</i></p>	<p>The full policy will indicate the date of launch, date of approval and review date. This will be found on the front page of the document.</p>
<p><u>Human Library</u></p> <ul style="list-style-type: none"> • Consider the impact on the Gypsy and 	<p><i>“My only concern was that there could be a negative impact on members of the Gypsy & Travelling community; those who are <u>not</u> living on</i></p>	<p>We have amended the policy to reflect our position on owners of caravans being restricted. Our internal guidance will reflect our stance on this, and we will</p>

<p>Travelling Community</p>	<p><i>designated (council run) sites, and who are therefore constantly forced to move their residential caravans on. As owners of the caravans they would, by virtue of the policy, be deemed to be homeowners & not eligible to apply for housing, despite living in constant insecurity”</i></p> <p><i>“Yes it seems fair enough, maybe each case could be looked at though, always a bigger picture, people might find hard to divulge., glad you put down victims of abuse, as was going to mention that”</i></p> <p><i>“I have read the note and the attachments and am completely happy with the Group's approach on both counts”</i></p>	<p>consider each case on its merits.</p>
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Next Steps

Our policy has now been approved by Home Group Board and colleagues have the resources in place to comply with this policy. If you would like to see a copy of our policy please click [HERE](#).

Thank you to those who took the time to be involved in this consultation. Your views and comments have helped to shape the way we work.