Interim Findings And Recommendations Allocations Policy Review 19th July 2012

1. Purpose of report

To set out interim findings and recommendations, in order to gain a steer from the Member Task Group on what options to consider developing in detail to include in a new draft Lettings Policy.

2. Introduction and background

The Allocations Policy Review Project Board and Project Team have worked with the Safer and Stronger Scrutiny Committee Task and Finish group over the past 6 months. Comprehensive consultation has been carried out between September 2011 and February 2012.
Following the completion of the consultation, analysis has been undertaken and a report attached setting out interim findings and recommendations below on a number of key areas that officers would like an indication from Members with regard to whether they should be worked up in to detail policy recommendations for inclusion in a revised Lettings Policy. There are a number of other areas that still need to be considered such as bidding and management of adapted properties, and these will be brought to future meetings of the Task Group, which will continue to operate as a working group after the 2012 local elections.

For each key area of policy identified above this report gives information on:

- What the current policy is.
- What works well in the current policy.
- What the issues are with the current policy.
- What the consultation showed.
- What research and bench marking told us.
- Options for consideration with main advantages and disadvantages.
- Interim recommended option to develop in detail and initial business case for this.

Members are asked to give a steer on the initial recommendations so that officers can develop detailed proposals. Members are also asked to indicate if there are any alternative approaches they would wish to be developed in to policy options. Detailed proposals will include a full appraisal of financial implications, risks and impacts including Equality Impacts.

It should be acknowledged that in revising the Lettings Policy this will not resolve all of the issues that arise and may have a contributory part to play only for example in the management of anti-social behaviour. It should also be noted that for some issues there simply isn't a total solution available. For example whilst we should try to make the best match of a property to customer needs we have constraints imposed by the type of stock we have or where it is located. The option of Council Housing will in these circumstances provide a housing option but will not necessarily be able to fulfil either all of an applicant's needs or aspirations. Many of our tenants are likely to continue to need on going support beyond the initial letting.

3. Summary of interim recommendations

The report contains options to consider for 5 key areas. The report sets out 2/3 main options for consideration. To help Members to consider these, officers have indicated a recommended

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option at this stage which it is felt would most merit being developed in to a full policy option. These recommended options are listed below:

1. Banding and Priorities - adopt a banding system that

    - recognises different levels of priority e.g. urgent need to move,
    - reduce the overall number of priorities,
    - introduces any new local priorities required e.g. local connection,
    - revises time restrictions on priorities,
    - retains a quota for applicants in general housing need with waiting time only.

2. Housing Registration and Management of Register– introduce policy that reflects the current and likely future availability of and demand for housing, maintain a more up-to-date and smaller register with better information gathered about prospective tenants, give better information to customers at point of registration and bidding and require more proactive engagement from customers and addresses issues of fairness. This could include for example adopting the following provisions which are common in other authorities:

    - Provide realistic advice on social housing and other housing options to customers prior to registration to make sure people understand the likelihood of being housed and what type of housing would most meet their needs or aspirations
    - More frequently review the register to remove people who are no longer interested in being on it or ensure they are only bidding for properties they are eligible for e.g. annual registration requirement
    - Require customers to provide proof of identity/household prior to either registration or prior to bidding
    - Take up rent references and tenancy references – to more effectively manage who is allocated a property and provide any necessary support to both the tenant and neighbours
    - Stop allowing people who are suspended on the register from continuing to accrue waiting time to encourage people to address issues e.g. rent arrears and anti social behaviour prior to any new tenancy and to differentiate this group more fairly from customers who have not had issues managing previous tenancies

3. Bedroom Eligibility Criteria – revise the criteria to ensure household are prioritised based on need as demand for all property types now outstrips supply, and to reflect the welfare reforms with relaxed criteria for specific circumstances e.g. older people's housing, or have been unable to let property to eligible household.

4. Revise the system of age designation as is not effective in managing stock or tenancies and does not reflect current demand.. This has to be considered in the context of housing management options to deal with tenancy issues, meeting different customer needs and coupled with steps such as better understanding and assessment of incoming tenants. More work is required to establish the most suitable option for Sheffield ranging from removing all age designation to applying it only in more limited circumstances than currently.

5. Choice Based Lettings – retain CBL as the advertising and matching mechanism for properties as it is more efficient and transparent than officer allocation and popular with customers to be able to express preference for individual properties.

It should be stressed that there are many different approaches that could be taken and that the ideas and options presented in the report are not all mutually exclusive of each other so

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elements from some could be incorporated with features of others. It is also of course the case that Members may not favour any of the options presented and officers would welcome an indication of any alternative ideas that Members would like to be developed in to detail policy options.

4. Key drivers and context for change

The key drivers for change that the Lettings Policy Review must address are:

- Perceptions around fairness, transparency and consistency.
- Simplicity and ease of use for customers.
- Make the best use of available stock and effective management of a scarce resource.
- Managing expectations when we have less stock and more demand than when the current policy was adopted when we had surplus stock and encouraged applications from both people who wanted housing in the near future and as an "insurance policy" in case a future housing need arose.
- Ensuring equalities are promoted in everything we do and that none of our practices are discriminatory.
- Legal compliance and a cohesive policy ensuring all the complex elements work together to contribute to achieve our aims and priorities for the city.
- Ensure sufficient priority is given to reasonable preference groups and any local priorities.
- Support aspirations and encourage attainment and financial inclusion.
- Contribute to a robust Self Financing model – delivering value for money and be cost effective.
- Respond to welfare reforms that will affect demand, customers ability to pay for accommodation and impact on rent arrears.
- Respond to the Localism Act.
- Support tenancy sustainability.
- Support community cohesion and promote mixed and sustainable communities.

5.1 Banding

Current Policy

Key Features
Each vacant property is designated for letting to one of 5 Letting Bands.
These are:
- **Housing register –** people with priority are considered first for properties in this band. All properties are in this band unless specifically designated within one of the other bands. There are 23 priority groups.
  Priority is awarded for a fixed period of time ranging from 4 to 26 weeks and is reviewed periodically. Priority can either be ended by a property being secured, or cancelled either with or without a final offer.
  Priority assessments are on demand at request of customer.
- **Waiting time –** one in every four of each type and size of property on each estate can be set aside for the waiting time band. For these properties all applicants are considered in order of their waiting time on the housing register.
- **First Come First Served –** Where there has been no demand for a property it can be offered to the first applicant who meets the letting criteria. If no applicants meet the letting criteria then the criteria can be relaxed. People who accept these properties retain their waiting time.

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- **Demolition** – Some demolition schemes will include provision for a demolition band so that people with demolition priority from the same area are considered first for vacant properties.
- **Overcrowding Band** – properties that have been released through release of High Demand Property priority will be allocated to people with Overcrowding Priority first.

What works well in the current banding policy?

- The quota system works well and is popular with customers because it allows at least 1 in 4 properties to go to people who have not been awarded a priority. In reality more than 35% of properties go to waiting time as properties refused by those with priority or with no bidders then go to waiting time customers.
- Discharging the Council's duty in relation to homeless applicants works well in ensuring that customers are clear when our duty has been fulfilled and in moving customers through the system.
- A number of people who would otherwise be considered as homeless are given a priority and do not have to go through the homeless route e.g. Domestic Abuse.
- It was effective when we had surplus stock in highlighting groups the Council would help to move quickly beyond the statutory reasonable preference groups. It paid particular attention to local issues at the time the policy was adopted such as demolition that needed to be prioritised.

Issues with the current policy

- Priority groups are all given the same level of priority so those in critical need of housing are placed alongside those with less urgent need to move.
- The current bands names are confusing.
- There are too many priority groups and many of these could be condensed into the reasonable preference groups. For some of our priorities there were zero or less than 3 awards in the past year – e.g. demolition for owner occupier, vulnerable 16/17 year old and dismissed service tenant.
- A local connection with Sheffield is not required or given any priority.
- People from outside Sheffield can move into supported accommodation and into Council housing and they are not encouraged to consider other housing options or account isn't taken of whether they need to be housed in Sheffield.
- Our policy does not recognise community contribution such as Foster Carers, volunteering, working in area.
- Our policy is not up-to-date in releasing of all properties that are now in higher demand where demand outstrips supply e.g. two bedrooms.
- Our policy would not be compliant with draft guidance on armed forces applicants by ensuring equal access to the housing register and therefore would need to change if this becomes statutory guidance.
- Time limits on bids are now unrealistic as demand has increased.

Consultation Results

- The number of priorities and inability to put most urgent cases first was of concern.
- BME groups raised fairness as a concern. BME groups would welcome more clarity around levels of priority.
- People outside Sheffield being housed ahead of Sheffield people is a concern for customers and impacts on their perception of fairness. 65% felt that people living in Sheffield should take preference.

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- People working on a low income would benefit from Social Housing as they struggle to afford other housing. Customers said it was not fair that there was no recognition of working and bringing a contribution to the community in this way.
- Social Housing should not be the tenure of last resort - people should value this scarce resource. Mixed and sustainable communities should be encouraged.
- Home owners should not be excluded from the Housing Register but could be given lesser priority and sale of property as a condition enforced.
- People with enough income/finance to resolve their own housing need shouldn't be totally excluded from the Housing Register but given lesser priority if they have the resources to resolve their own housing need.
- There is a lot of support for providing a level playing field for people leaving the Armed Forces
- Mixed views on the quota for waiting time. Some think that the current quota system is reasonable. Many would like to see the quota changed to 50:50, or at least increased.
- People working with vulnerable groups were concerned that the quota to priority groups should not be reduced. This was backed up by the questionnaire.
- Concerns expressed about the time limits on priorities as they no longer reflect how long it takes people to be given a suitable offer of housing. Some felt that the time limits are confusing and that there are too many different time limits. Others think time limits are necessary, help applicants to understand the system, and without them the costs of temporary accommodation would rise.

Relevant Research

- The Project Team looked at over 30 other Councils' policies and all had a banding system that identified and prioritised by levels of urgency. Most authorities have 4 or 5 bands depicting levels of need but some have as few as 2 or as many as 6.

- Sheffield has a very high number of priorities and this reflects the time the policy was last reviewed when there was a surplus of stock. Need to reduce this to reduce administration (priorities need to be assessed) and to reflect the availability of stock and make it simpler to understand.

- Many of the separate priorities are in fact sub-sections of the statutory reasonable preference groups and therefore could fairly easily be streamlined.

- Analysis also shows that a relatively high number of cases are awarded as Special Case priority (204) which needs to be better understood given the large number of specific categories that do exist.

- Time limits on priorities do not reflect the realistic periods within which people are likely to be re-housed and therefore a lot of process/review activity results in extending a priority. This resource could be more effectively used for other activity or to help with savings. Customers feel penalised and forced to accept properties they are not interested in or refuse properties.

- Some Councils do have quota systems for general housing need (Sheffield's is relatively high at 25%), but those that don't ensure everything goes to priority first. The quota system is popular in Sheffield and works well. Some authorities are more flexible in being able to have local quotas or varying the quota according to issues in specific areas.

- A number of other authorities give lower priority to homeowners or those with capital/ability to meet own housing need.

- Many authorities are reviewing their policies in light of the new flexibilities of the Localism Act creates. Other authorities already recognise people working on a low income, contributing to the community by volunteering, fostering etc., and say that it brings a balance to communities.

- The new Code of Guidance on allocations indicates Armed Forces must be given priority. A number of other Councils have already addressed this.

- There is evidence that Sheffield imports from other authorities because of our policy by not requiring or prioritising local connection. This has been seen particularly in applicants coming through the supported accommodation route.

Options

1. Keep the system as it currently is.
2. Adopt a banding system that recognises levels of priority, reduces the number of priorities, introduces other local agreed priorities and considers priorities first for all properties.
3. Adopt a banding system that recognises levels of priority, reduces the number of priorities, introduces other local agreed priorities, reviews time restrictions on priorities and retains a quota for applicants in general housing need with waiting time only.

Option 1 – Keep the current system

Advantages

- Members and Staff are familiar with the current policy
- Customers are familiar with current policy
- Retains current quota for waiting time and ability to review this quota to reflect need
- All statutory reasonable preference groups are provided for
- Local priorities currently agreed e.g. Domestic Abuse do mean some applicants will not have to make homeless application
- No need to manage a change
- Allows close management of priority cases e.g. homeless where Council is incurring costs of Temporary Accommodation by monitoring of priorities and discharge of duty

Disadvantages

- Fail to differentiate between urgency of housing need and re-house most urgent promptly
- Does not simplify priority categories, remains out of date with obsolete or little used priorities retained
- Doesn't respond to consultation feedback
- Fail to align ourselves with neighbouring authorities so that we don't import cases with high levels of need, which will ultimately put a further strain on our resources
- Out of city applications links to perceptions fairness for customers
- Doesn't take advantage of freedoms to identify local priorities
- Won't address prioritisation of armed forces if this becomes a statutory requirement.
- Time limits on priorities will continue to be out of step with realistic re-housing times

Finance

- Costs £87 per priority assessment based on assessing 5,266 cases per year. This comes from an overall staff costing to manage and assess priorities of £462,142 per year.
- Full costs of keeping people in hospital/providing social care have not been calculated, but for example it costs £440 per day per person for out of town mental health placements.
- Drive to further reduce use of B+B/temporary accommodation to house homeless applicants when demand is increasing not supported if cases not prioritised.

Option 2 - Adopt a banding system that recognises different levels of priority, reduces the

Key Features

- Stream line the number of priorities particularly where can condense into reasonable preference groups
- Determine bands that recognise levels of urgency and prioritise according to this e.g. top band would be small and contain only most urgent e.g. life threatening, hospital discharge that can't return safely home
- Identify any other local priorities e.g. local connection, community benefit
- Advertised all properties for priorities first and only allow properties not taken to go to waiting time applicants

Advantages

- Priority cases re-housed more quickly and some may have much more choice about where they live
- The policy will be easier to understand with fewer priorities and may be easier to administer
- Temporary accommodation and other costs associated with longer waits for housing will go down
- We will be more aligned with our neighbouring authorities and not so prone to importing cases which will address some of consultation feedback
- We should see more mixed and sustainable communities developing **if** priorities include community benefit
- Uses new flexibilities and address requirement to prioritise armed forces

Disadvantages

- People may still feel priorities are unfair but this will be true of any system where decisions are made about who should have a higher priority for housing
- Will be unpopular with customers who do not have a priority and currently bid with their waiting time
- System could increase priority chasing as perceived to be only means of getting Social Housing and best choice of available housing
- Won't necessarily promote mixed and sustainable communities if priorities take greater share of properties
- Some priorities e.g. community benefit could be difficult to define
- If adopted local connection would need to consider how people are supported to move for work
- Still retain unrealistic re-housing time targets

Recommended Option 3

Adopt a banding system that recognises levels of priority, reduces the number of priorities, introduces other local agreed priorities and ability to pilot them, reviews time restrictions on priorities and retains a quota for applicants in general housing need with waiting time only.

Key Features

- Stream line the number of priorities particularly where can condense into reasonable preference groups
- Determine bands that recognise levels of urgency and prioritise according to this e.g. top band would be small and contain only most urgent e.g. life threatening, hospital discharge that can't return safely home
- Identify any other local priorities e.g. local connection, community benefit, expand release

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high demand to two bedroom properties and ability to pilot or apply in areas as needed

- Retain a quota for waiting time applicants of at least 25% and ability to review this or vary locally
- Review time restrictions on all priority bands to either remove entirely, vary or make more realistic

Advantages

- The more urgent priority cases will be re-housed more quickly and some may have more choice about where they live
- The policy will be easier to understand with fewer priorities and may be easier to administer
- Temporary accommodation and other costs associated with longer waits for housing will go down
- This option will be more popular with waiting time applicants as they will still be able to bid and be housed with access to all property types and areas
- We will be more aligned with our neighbouring authorities and not so prone to importing cases
- Customer satisfaction levels could rise
- More sustainability and fewer refusals as we are able to manage expectations better and greater ability to manage local issues. If more sustainability is achieved then this will result in cost savings in rent loss from vacant properties.

Disadvantages

- People may still feel priorities are unfair but this will be true of any system
- Some priorities e.g. community benefit could be difficult to define
- Risk that priority cases may not move through the system more quickly as the time restrictions are removed/reviewed
- If adopted local connection would need to consider how people are supported to move for work

Business Case For Recommendation

- Most critical cases can be prioritised resulting in potential savings and reduction in amount of human suffering/ harm.

- All other local authorities with CBL do prioritise applicants using a banding system of some description as the fairest way to allocate properties where demand outstrips supply

- Increasingly authorities are adopting local priorities.

- Current priorities are out of date and reflect time when more stock was available.

- Current time limits are unrealistic and are continually extended for that reason – however some time limits are likely to be needed.

- Currently our quota system has benefits - in reality 37% of properties go to waiting time. It is not necessary in Sheffield to prioritise all stock for priority applicants and would not be popular or fair.

5.2 Registration and Housing Register Management including bidding
Current Policy

Sheffield City Council operates an open housing register. Anyone over 16 can join, although they are not usually offered a property until they are over 18.

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SCC works in partnership with the Housing Associations in the city, so if you join Sheffield City Council's housing register you can also be nominated for some Housing Association properties in the city.

Anyone who is subject to immigration control within the meaning of the Asylum and Immigration Act 1996 is not a qualifying person and cannot be registered. Applicants are not required to provide documentary proof to support their application until they are matched to a property.

Applicants complete a registration form and are registered from date form returned. Owner-occupiers can join the housing register in the same way as other applicants. However, if they accept a Council property they must agree to take all reasonable steps to sell or dispose of their property within 6 months of the date they take the tenancy. The whole of waiting time from each new registration is taking in to account when allocating a property. Customers can be on multiple registrations.

In some circumstances registrations are suspended. This means they will not be offered a property whilst suspended although they continue to accrue waiting time. For example if they behave anti-socially or have a history of rent arrears or other housing debts to the Council. If you accept a property your registration is used up.

The policy says the register will be regularly reviewed but a timescale is not set out and applicants are required to inform of changes of circumstances. There is a rolling review of the register but whilst this does remove applicants who do not respond or say they do not wish to re-register, the pace is too slow to bring the register up to date and significantly reduce the size of it. 12,000 new applications are processed every year. There are 90,000 registrations currently.

Once registered, customers are able to bid for any properties that are advertised including ones they are not eligible for.

What works well in the current policy?

- Customers find it easy to register as they just have to complete and submit a form
- Help is given to customers who find it difficult to register
- Relatively little cost to initial registration because applicants are not seen in person to complete registration and checks are not undertaken at this stage
- The policy was very successful in attracting a lot of people to register when supply outstripped demand for certain property types and it was felt there was enough stock to encourage people to register in case they needed social housing at any time in the future
- The policy worked well when a larger stock portfolio existed and was sufficient to offer more people a realistic prospect of becoming a Council tenant

Issues with the Current Policy

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- Little active engagement in the application process required from customers after initial registration and therefore not clear how serious customers are about being a tenant.

- No tailored housing options advice given at the point of application – expectations not managed or realistic. This may contribute to younger tenants taking on a tenancy when they do not understand the implications and may lead to offers being refused (though this is also related to unlimited bidding).

- There is limited information about who our prospective tenants might be and therefore unable to target marketing or housing options. Rent and tenant references are not required so we are not always aware of issues that may have either prevented a tenancy being issued or may have resulted in support being given.

- The rolling review of the register and quality assurance activity in last year has reduced the size by several 1000 applicants to under 90,000. Documents are now scanned to assist with processing of applications. However this process is too slow to keep register up to date and to a manageable size – other councils specify in policy frequency of re-registration.

- The size of the register fuels local and national perceptions that there is a huge amount of unmet need in Sheffield and that it is imperative to join register as an insurance policy as you can only be housed with many years waiting time. It can be seen as unrealistic to continue to encourage adequately housed people to register as an insurance and to accrue waiting time when there is not enough stock to meet demand.

- It could be seen as unfair to have a policy that allows indefinite accrual of waiting time with no account taken of need during that time or efforts made by customers to meet their needs e.g. by bidding for properties. Customers who are not genuinely queuing until a property comes up that meets their needs are rewarded for the length of time they had the foresight or physical ability to join the register – this could be seen to favour older people who have been able to accrue more waiting time and could also be seen to discriminate against BME groups who are less likely to have lived with and had knowledge of the policy. This could cause more problems in the future as increasing numbers of customer accrue very long waiting times but may have less need of a property than other applicants bidding for the same property.

- Checks are not required at application stage or before bidding so it is not possible to ensure bidders for properties are eligible until matching and offer made. The new lettings ICT system will make eligibility rules for properties clear, but if policy changes to restrict bids to properties it will be important that registration details are up to date.

- Current requirements in policy to provide proof of sale of owner occupied property and notify of change of circumstances is not monitored and there are no sanctions.

- Current policy can suspend people but they still continue to accrue waiting time during the period of suspension.

Consultation Results

- Support for more proactive management of the housing register from customers and staff alike. Via the consultation questionnaire 86% of the 500+ respondents said they would like to see us ask for more documentation.

- It was suggested that we find about more about the people on the register. More active management of the register was also suggested, from an annual review, to being more

proactive about changes in circumstances – although some were concerned that it would be easy to forget to do this and more vulnerable people would struggle with this.

- Some felt that a proactive housing options approach is needed at the beginning of the process in order to manage both the housing register and people's expectations.

- 70% stated they strongly agreed or agreed with checks being carried out for mortgage and rent arrears as well as references.

- 89% answered yes to applicants having to produce documents to confirm their identity and living arrangements when registering. 7% stated no and 4% did not know. (489 answered)

- Some felt that we should become stricter about ASB, whether by excluding people from the register or managing their tenancies better. A range of groups would like to see the introduction of more behaviour related checks relating to previous tenancies. The questionnaire asked, 'Are there any groups of people we should stop from joining our Housing Register altogether?' ASB perpetrators was the most popular answer.

Relevant Research

- Most Councils maintain more up-to-date registers with a requirement to re-register annually. Most ask for documents and information up front.

- A lot of authorities have moved, or are moving to, a more housing options approach. It is recognised that some applicants will have little or no hope of securing anything through the register and so it is important to give the right advice at point of application and manage expectations appropriately. This also pro-actively manages housing problems before they escalate and catches issues at the earliest opportunity.

- A lot of authorities carry out home visits and verify the information given to them by applicants and prior to offer stage. Applications are not processed without complete information and not registered unless complete and confirmed eligible. Suspended applicants do not accrue waiting time like they do in Sheffield.

- Many authorities are framing their policies to encourage customers into work or education, or to aspire to good tenancy management and others are recognising community contributions.

- Sheffield's register and rate of registration is by far the largest in the country and we can learn from how other authorities have reduced the register by a combination of policies in relation to eligibility and management. Other core cities have a range of between 5-11% of households on the register. The equivalent of 43% of Sheffield's households are registered. The proportion of people not bidding is disproportionate at 80%. No other authorities encourage registration from applicants who are not currently looking for social housing – their waiting lists are largely comprised of people who have recently registered/re-registered **and/or** are actively bidding for properties.

Options

1. Keep the system as it currently is.
2. More proactive management to maintain up-to-date register e.g., annual registration requirement, identification checks and references – more time is needed to work up details.
3. Run two registers – one for active bidders and one for those only expressing interest.

Option 1

Advantages

- Will be popular with non-active applicants
- Will not require more resources or staff time to manage
- Will not require any revision of procedures or staff training
- We can continue to house customers some of whom have complex needs and we owe re-housing duties to who may fail to be housed if there was more requirement to provide references or meet certain conditions

Disadvantages

- Doesn't get it right first time for the customer by pro-actively manage expectations realistically and giving good housing options advice.
- Reputational risk associated with having the largest register in the country.
- Out of step with best practice of other authorities who have managed to reduce registers effectively
- Difficult to target information to such a large group or market effectively.
- Limited knowledge of incoming prospective tenants and their needs unless they have previously been a SCC tenant or are in a priority category (for example homeless)
- Delays with offers due to lack of information at offer stage.
- Unable to carry out early homeless intervention work due to lack of information.
- No future proofing for increase in demand for Social Housing.
- Encourages priority chasing as fuels impression can only get re-housed with priority and very long waiting times.

Option 2 Run two registers

Key Features

- Run 2 registers one for active bidders and one for those only expressing an interest
- Applicants would need to proactively move to active list and comply with all requirements to register, up-date etc
- Introduce better housing options advice before activating registration including tenant obligations, cost of housing, likelihood of meeting aspirations or needs, other alternatives
- A decision would need to be made about what "currency" the inactive list had e.g. would a cap apply or would waiting time accrue for everyone on this list

Advantages

- May be popular with non-active applicants
- Maintain a unique Sheffield approach which is not reflected elsewhere of encouraging people to register for social housing as an "insurance policy"
- Could concentrate on keeping up to date the active bidder list
- If there is a quota for waiting time for people in general housing need then there needs to be some mechanism for assessing waiting time.

Disadvantages

- Doesn't pro-actively manage customers' expectations realistically at application stage.
- Creates more work for staff when there are no more properties available.
- Costs associated with maintaining two registers at a time when resources are scarce as if there is no review of the inactive list this will continue to grow year on year.
- Reputational risk associated with having the largest register in the country continues
- Has many of the disadvantages of Option 1 unless decide to adopt features of option 2 with the active bidders list
- Could be confusing and cause more complaints and queries from applicants

Recommend Option 3

More proactive management to maintain an up-to-date register e.g., annual registration requirement, identification checks and references, introduce restrictions for better management – more time is needed to work up details.

Key Features

- Introduce better housing options advice before registration including tenant obligations, cost of housing, likelihood of meeting aspirations or needs, other alternatives
- Set out frequency for review/re-registration e.g. annual (this could apply to all options)
- Introduce evidence checks earlier in process either at point of registration or bidding. Restrict bidding to eligible properties – this could apply to all options.
- Expand rent arrears checks from former SCC tenant to all people before tenancy offered and/or tenancy references
- Consider "currency" of waiting time for inactive applicants or those who are suspended from the register for example could stop suspended applicants from accruing waiting time, could only count waiting time that has accrued whilst the applicant was eligible for the type of property they have bid for or put a cap on waiting time
- Consider introducing restrictions on immediate re-registration when been re-housed
- Consider penalities/demotions for customers who refuse offers

Advantages

- Would expect the register to reduce as only people who are serious about re-housing will register so annual review costs will reduce in time.
- Updated message conveyed that social housing is a scarce and valuable resource which is unlikely to be available to the vast majority of people registered and we will be more careful about who can become a tenant. Shifts culture on viewing Social Housing as a realistic insurance policy for most people and increases focus on other housing options.
- Able to target resources appropriately and market more effectively.
- Better understanding of applicant's needs and more appropriate allocations resulting. Better tenancy sustainment as a result.
- Less delays on offers and acceptances with resulting revenue loss, voids times and customers awaiting re-housing.
- Potentially better tailored housing options for customers producing more holistic and realistic outcomes. More chance of early intervention and therefore prevention of homelessness.
- Potentially fewer complaints, Member's enquiries and higher customer satisfaction if applicants expectations are managed.
- Could differentiate between people who have been genuinely seeking housing and those who are not

Disadvantages

- May initially be unpopular with applicants and support agencies as they have to provide more information and documents.
- More resources will be required to manage the processes up front.
- Staff training on new processes and procedures, and new procedure manuals required.
- Is a major shift in emphasis and requires educating applicants and support agencies regarding new procedures and cultures about the purpose of social housing.
- Customers currently accepted for re-housing that we owe a duty to may not be accepted – this could mean we have difficulties discharging duty or would need to invest more in supporting them in other housing.

Business case supporting recommendation

- Policy was framed at a time when we had far more stock available and this situation has

reversed with demand now considerably outstripping supply. It is no longer realistic to encourage people to register as an insurance policy before they have considered all their options and had advice on this.

- This doesn't mean it is wrong to encourage people to wait as there is less stock than is needed at anyone time. But it isn't helpful to customers to mislead them about the possibility of social housing meeting their needs when they are planning their futures.

- Sheffield has the largest Housing Register in the country, and it is not reviewed frequently enough to keep it up to date. We know relatively little about the customers on the Housing Register and therefore do not target resources and advice. This contrasts with other Councils that actively manage their waiting lists and can target resources appropriately.

- By not expecting customers to at least re-register regularly, not having any penalties for refusals, and not giving good initial advice, a message is conveyed that social housing isn't as valuable or rare as it really is and that applicants need to make little commitment. This could contribute to the high number of refusals of offers and rate of tenancy failure.

- Tenants and prospective tenants are very concerned about ASB and the effects on a community. There is a lot of support for more checks being carried out prior to acceptance onto the Housing Register or being offered accommodation to mitigate this risk.

- This would not provide a complete resolution to issues – many customers will have complex needs particularly those the Council is obliged to give reasonable preference to.

5.3 Bedroom Eligibility

Current Policy

	Studio Flat	1 Bed Flat or House or Bung	2 Bed Flat or Mais	2 Bed House or Bung	3 Bed House or Bung	3 Bed Flat or Mais	4 Bed House	4 Bed Flat or Mais	5 Bed +
Single Person	✓	✓	✓						
Single Person with overnight access to 1 or more children	✓	✓	✓						
Single Person with overnight access to 2 or more children	✓	✓	✓			✓			
Couple or 2 Adults		✓	✓	✓					
Household with 1 child			✓	✓					
Household with 2 children same sex or 3 individual adults			✓	✓	✓	✓			
Household with 2 children opposite sex; or 3 or more children					✓	✓			
Household with 4 or more children; or household of at least 6 people in total					✓	✓	✓	✓	

| Household with 5 or more children or Household of at least 8 people in total | | | | ✓ | ✓ | ✓ | ✓ | ✓ | The table |

below sets out the current eligibility criteria for bedrooms/type of property:
If more than one applicant is eligible then the property is allocated on order of registration. If nobody meets the eligibility criteria then the property can be let to a smaller household.

What works well in the current bedroom eligibility section of the policy?

1. The flexibility to relax the criteria if no-one meets the criteria.
2. Households can occupy a property with a spare bedroom and can potentially meet future housing need without moving/access to children is acknowledged
3. The generosity of the eligibility criteria has been effective in making sure properties that would have otherwise been vacant are occupied.

Issues with the current policy

- The policy was originally formulated at a time when there was an over supply of Social Housing and so could be more generous with bedroom allocation. That is not the case today with 90,000 on the register and 18,500 actively bidding for only 4,000 lets. Demand for Social Housing now far exceeds supply.

- This applies for all size of properties so under current policy we are allocating family size housing to single applicants or those without children in preference to customers with larger households who need them where eligibility overlaps. For example a single person is eligible for a 2 bedroom flat as is a couple with 2 children of the same sex. If a single person has the earlier registration date they will be allocated the property.

- There is an inherent contradiction between having priorities and incentives for people to move out of properties they are under-occupying at the same time as having a policy which encourages under-occupation.

- Proposed welfare reform raises affordability issues for incoming and current tenants under-occupying. Tenants and prospective tenants face a real possibility of being unable to pay their rent due to reduced housing benefit provisions that are likely to apply from April 2013. This will increase the level of arrears, possession actions and void times.

- Welfare reforms are wide spread and will also affect those in the private rented sector and owner occupiers. This may increase the demand for Social Housing further and there may be increases in homeless approaches due to affordability issues in current properties.

- Sheffield's relatively generous criteria compared to neighbouring authorities makes it more attractive to non-Sheffield residents to register for housing.

Consultation Results

65% of responses to the consultation questionnaire agreed that policy should be changed to allocate a property with the minimum number of bedrooms to meet an applicant's current housing need.

Relevant Research

Many northern cities have already adopted the minimum bedroom standard as their eligibility criteria with the ability to relax the criteria. This has been in response to the supply and demand issues experienced in most authorities and puts them in a better position with the

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coming Welfare Reforms proposed.

SCC adopted current policy of a generous bedroom allocation to deal with over-supply of properties and this is no longer the case.

Options

1. Keep the system as it currently is
2. Bedroom Criteria tightened to reflect current supply shortage more in line with Welfare Reforms i.e. 'need' only
3. Bedroom Criteria tightened to reflect current supply shortage be more in line with Welfare Reforms with relaxed criteria for specified circumstances

Option 1 Keep system as it is

Advantages

- Staff and applicant's are familiar with the current system.
- No changes necessary to processes, documentation, systems etc.
- People do not always have to move when needs change
- Continue to attract people to Council housing who are not benefit dependent and can afford rent if can have a larger property

Disadvantages

- Not recognising and responding to increased demand for Social Housing and supply outstripping demand for all property sizes. Families will continue to live in unsuitable housing whilst properties are allocated to people who do not "need" them.
- Perceptions of unfairness as properties are allocated to people who do not need them when there are supply and demand issues.
- Not managing a scarce resource efficiently.
- Not dealing with affordability issues for tenants in receipt of reducing benefits.
- People needing to down size being unable to.
- Not responding to the increasing pressure that Welfare Reform will put upon applicants of all tenures and the resulting possible further increase in demand for Social Housing.
- Rent loss, churn and associated costs that we can't afford with the new HRA funding gap for Sheffield and to sustain a robust Self Financing Model
- No coherent policy on under-occupation
- Sends message that people do not have to be able to afford their home when we rent it to them which will create difficulties when trying to address arrears

Option 2 Bedroom Criteria tightened to reflect current supply shortage more in line with Welfare Reforms i.e. 'need' only

Key Features

- Revise letting criteria so that maximum bedroom entitlement more closely reflects need and demand for housing
- Remove overlaps between eligible categories

Advantages

- Recognition that Social Housing is a scarce resource and can no longer afford to promote under-occupation.
- Recognises supply and demand miss match for all property sizes.
- Better utilising the stock and ensuring properties are populated fully.
- Allocating people what they 'need' rather than 'want' is positive in terms of encouraging move-on to other housing options thus freeing up Social Housing for others that need it.
- In line with consultation findings.
- Creates less competition for two and three bed properties as fewer will be eligible.

- Protects tenants from gaining tenancies that are not affordable.
- Pre-empts problems associated with issuing unaffordable tenancies such as rent arrears, court action and possible eviction.
- Minimises churn in respect of loss of tenancies due to affordability issues.
- Coherent policy on under-occupation

Disadvantages
- People may have to move on when circumstances change, creating churn.
- Reducing choices for people who can afford to pay (not on benefit) could be controversial.
- Maybe less attractive to some applicants as limits the current choice they have to have an extra bedroom.
- Tenants downsizing or in demolition schemes may find options less attractive.
- Some properties may become hard to let e.g. age designated 2 bed bungalows.
- Age designated stock becomes harder to let.
- May restrict some areas even more for younger people (if no 1 bed non age designated available).
- Creates more competition for one bed properties.

Recommended Option 3 Allocation tightened to reflect current supply shortage in line with Welfare Reforms with relaxed criteria for specified circumstances

Key Features

- For the majority of properties revise letting criteria so that maximum bedroom entitlement more closely reflects need and demand for housing and in line with welfare reforms
- Remove overlaps between eligible categories
- Retain flexibility to allow a more generous allocation for example for older people's housing
- Retain flexibility to let property to a smaller household than is eligible if no eligible household requires property **and** prospective tenant can pay rent

Advantages
- Recognition that Social Housing is a scarce resource.
- Recognises supply and demand miss match.
- Better utilising the stock and ensuring properties are populated fully.
- Protects tenants from gaining tenancies that are not affordable.
- Pre-empt problems associated with issuing unaffordable tenancies such as rent arrears, court action and possible eviction.
- Minimises churn in respect of loss of tenancies due to affordability issues.
- Creates less competition for two and three bed properties.
- More attractive option for tenants downsizing or in demolition schemes
- Allocating people what they 'need' rather than 'want' is positive in terms of encouraging move-on to other housing options thus freeing up Social Housing for others that need it.
- More coherent policy on under-occupation.
- More flexible than option 2 and therefore less likely to have voids in certain housing e.g. older peoples

Disadvantages
- People may have to move on when circumstances change, creating churn.
- Reducing choices for people who can afford to pay (not on benefit) - could be controversial
- Maybe less attractive to some applicants as limits the current choice they have to have an extra bedroom.
- Could be difficult to define why some could still continue to under-occupy if there is a clear business case not to allow this – consistency and fairness.
- Some properties become hard to let (could be mitigated by relaxing criteria in some circumstances)
- May restrict some areas even more for younger people (if no one bed non age designated available).

- Creates more competition for one bed properties.

There is a huge mismatch between supply and demand. Many northern cities have already adopted the bedroom standard as their eligibility criteria with the ability to relax the criteria. Sheffield no longer needs or can afford to be more generous than neighbouring authorities.

65% of responses to the consultation questionnaire agreed that policy should be changed to allocate a property with the minimum number of bedrooms to meet an applicant's current housing need. This would also address customer's perceptions of fairness as often they can't understand how a single person can be given a larger property than they need when we have such a high demand.

Welfare reform is going to affect more people in Social Housing and private rented housing who need to down size. It is important to minimise rent losses as much as possible and not increase our losses of approximately £2.1 million per year. A self financing model will not be robust if we encourage under-occupation and the accrual of rent loss.

5.4 Age Designation

Current Policy

All bungalows and each block of flats will be designated for one of three groups:

- No minimum age limit;
- 40+ or with mobility needs and with no children under 16;
- 60+ or with mobility needs.

For properties with a minimum age limit we make every attempt to offer the property to someone above the minimum age. If there are no suitable applicants we let it as First Come First Served without considering other applicants who have bid but do not meet the minimum age limit. If there is still no demand from people who meet the minimum age limit we will consider re-designating the bungalow or block of flats.

What works well in the current age designation section of the policy?

1. Age designation is popular with some older people.
2. Age designation addresses some of the issues around clash of life styles and anti-social behaviour/perceptions of safety.

Issues with the current policy

- Age designated properties can be hard to let because no one of that age wants them.

- 96% of the properties that drop into the First Come First Served band are age designated

- FCFS properties are not advertised on the internet and a person can get larger accommodation than they are eligible for just because they see it and bid for it first. Or can be housed ahead of people who have been waiting longer

- Although policy says we can consider de-designating properties, in reality this is a lengthy complicated process.

- More than a quarter of all our flats and bungalows are aged designated but the majority of bids come from people under 40 years of age – so a disproportionate amount of stock is age designated. This could be seen as discriminatory against younger people who are not been given fair access to available housing.

- Lack of properties in some areas has the affect of concentrating under 40s customers into areas of the city where there are more properties without designations. These areas can sometimes be far from support networks and in unfamiliar areas of the city and this does not support the sustainability of tenancies for younger people.

- Age designation is not compatible with mutual exchange rules as not meeting an age requirement is not a grounds for refusing an exchange. It cannot be enforced when customer have exercised RTB which may become more of an issue in future.

- Location, distribution and type of age designated stock means properties are not always appropriate for the 60+ group, such as located on a hill or far from transport links, shops etc or on the top floor.

Consultation Results

- This is a very emotive subject requiring careful and sensitive thought.

- There is a lot of support for removing the over 40's designation as it appears arbitrary and this assumes an awful lot about people, not least that a person over 40 won't have children.

- Support for other ways of managing the housing register, allocations and estates could bring more confidence that the associated difficulties of de-designation could be overcome.

- 47% respondents answered that we should have age banded properties and 44% answered that we shouldn't. 9% answered that they did not know.

- From the questionnaire, 63% of respondents felt that we should remove age restrictions from properties that are proving harder to let

- There is a lot of concern about restricted access to housing for those who are under 40 – both with priority and waiting time.

- Many share concerns about the re-designation process, transitional period and who is housed there. Various suggestions have been made about how the system could be changed. These include expanding the use of sensitive lets, local lettings policies, managing tenancies differently and checks on incoming tenants.

- During consultation Social Services (adult services) commented that they report higher levels of support required from their services in some areas where older people are concentrated. Older people supporting older people doesn't always work very well and older people in a mixed community can receive more support from a mixed community environment.

Relevant Research

Other authorities are seeking to remove age designations and manage estates differently. Stockport have a 10 year strategy to remove all age designations from stock, Manchester are moving to Local Lettings Policies and have been recognised for their excellent work in reducing ASB. Leeds are reviewing specific locations where they have age designated stock and are bringing in Local Lettings Policies as an alternative estate management tool.

Most other local authorities carry out an annual review of their housing register and have many more requirements to produce documents, references, etc. They also carry out more checks and ask for more information than we do. This in turn means that they have a better understanding of who is on their housing register, what their support needs are likely to be and give more tailored housing advice and options up front.

There are sometimes housing management issues with incoming new tenants. Other authorities manage these differently such as by issuing introductory tenancies or the introduction of Local Lettings Policies that might specify lets to working people or people with older children or no children. There is mixed evidence on the effectiveness of introductory tenancies and this would need to be fully investigated.

Options

1. Keep the system as it currently is and pursue reviews more rigorously.
2. Remove all age designations.
3. Remove all 40+ age designations and reduce 60+ age designations to only specified properties, identified through comprehensive review.

Option 1

Advantages
- Older applicants will be happier
- Do not have to manage big change in policy
- Helps to manage problems such as ASB, clash of lifestyles

Disadvantages
- Continued rent loss and voids.
- Empty properties at a time when demand for housing is high.
- Continued miss match of supply and demand.
- Inefficient management of a scarce resource.
- Properties continually dropping through to First Come First Served.
- Not all priorities getting the opportunity to bid on First Come First Served properties so increased costs associated with longer stays in temporary or supported accommodation.
- Complaints from individuals and organisations wishing to access those age designated hard to let properties for themselves and their clients.
- Continued perceptions of unfairness in the process.
- Continuing to concentrate young people elsewhere in the city often far from their support networks. Resulting issues of ASB, tenancy failure, rent arrears, damage, abandonment, churn, costs associated
- Out of step with the demand and disadvantages younger people.
- Costs resulting from inappropriate lets such as officer time spent on ASB complaints, rent arrears, churn etc.
- Possible challenges regarding equalities issues in relation to discrimination against people under 40 years of age.
- Failure to create mixed and sustainable communities in areas of the city.
- Continued conflict with mutual exchange rules.
- Not recognising the need to be more business minded in the light of the change to the way Council Housing is funded.

Option 2 Remove all age designations

Key Features

- Remove all age designation
- Produce strategy for ending of all age designation
- Introduce alternative approaches for managing lifestyle clashes and minimising risk of lets to customers who will cause issues for others e.g. pre-tenancy checks/references, concierge schemes, tenancy support

Advantages

- Good management of stock and of a scarce resource.
- Less empty properties.
- Less properties being hard to let.
- Less rent loss.
- More opportunities for housing for younger people.
- More mixed and sustainable communities.
- More housing for younger people in areas where they already have support networks.
- Less churn, therefore less costs associated with churn.
- Less tenancy failure and therefore less costs associated with repairs and relet processes.
- Less ASB and related costs.
- Less complaints from under 40s and related agencies.
- Risk of challenges regarding discrimination removed.

Disadvantages

- Unpopular with 60+ groups, their families and support agencies.
- More complaints from older customers
- Less take up of release high demand if cannot elect to go to age designated properties in future
- Doesn't allow choice to live in quieter areas or that forcing people together e.g. in flats that may not have good sound insulation could be counter-productive for all.

Option 3 Remove all 40+ age designations and reduce 60+ age designations to only specified properties, identified through comprehensive review.

Key Features

- Remove all 40+ age designations
- reduce 60+ age designations to only specified properties, identified through comprehensive review
- Introduce alternative approaches for managing lifestyle clashes and minimising risk of lets to customers who will cause issues for others e.g. pre-tenancy checks/references, concierge schemes, tenancy support

Advantages

- Closer to current policy than more radical change and will still be able to provide more targeted accommodation for older customers
- Frees up more accommodation for the under 60s.
- Good management of stock and of a scarce resource.
- Fewer empty properties and being hard to let.
- Less rent loss.
- More opportunities for housing for younger people.
- More mixed and sustainable communities.

- More housing for younger people in areas where they already have support networks.
- Less churn, therefore less costs associated with churn.
- Less complaints from under 40s and related agencies.
- Risk of challenges regarding discrimination removed.

Disadvantages
- Could be unpopular with 40+ groups, their families and support agencies

Recommendation

More work is required – system of age designation does need to be revised as is not effective in managing stock or concerns about anti-social behaviour but has to be considered in context of developing more effective housing management options to deal with issues, meet different customer needs and coupled with steps such as better vetting of incoming tenants.

Business case supporting recommendation

Most of the properties appearing on First Come First Served are age designated properties that we can't let to people of those ages. This shows the lack of demand for those properties by people of those ages. 26% of all flats and bungalows are aged designated. This breaks down as 14% to 40+ and 12% to 60+.

Age designation was introduced in response to older people's concerns over clashes of life styles and ASB. This has some success but is not wholly effective. Other Councils show that there are now new and better tools to deal with such issues and concerns also. Knowing more about our incoming tenants will also help us to deal with any issues and support vulnerable tenants more appropriately.

Younger people are finding it difficult to access accommodation in some areas of the city and are being forced to occupy other areas of the city. Currently 25-30% of new tenants quit their tenancy within the first two years, which creates significant direct costs through rent loss, vacant repairs and the managing the letting process.

The Self Financing Business Plan highlights the problems and issues and endorses the need to reduce the proportion of housing stock that is age banded.

5.5 Choice Based Letting
Current Policy

The current policy is for the majority of properties to be let by Choice Based Lettings - i.e. by customers bidding for properties and being matched by the criteria set out in the policy.

The majority of properties are advertised and customers have a week in which to bid for properties. Customers are then matched – according to length of priority/waiting time. Successful customers are informed of the outcome and offered a property. At this point checks are made on identity and eligibility.

Any property that has not been allocated via this system is let via First Come First Served.

A number of properties are allocated as management lets i.e. are allocated to customers with a requirement for that property e.g. to discharge a duty or deal with an urgent/unusual circumstance.

What works well with CBL?

- Enables available properties for let to be advertised. This makes lets more open, transparent and accessible to all. Letting information can be published in respect of each let
- Following the introduction of CBL there are fewer low demand properties. In the past shortlists for particular areas excluded applicants that hadn't identified that area as of interest to them.
- CBL customer led and not officer led. Customers like being able to see and choose.
- Reduces costs in terms of voids, hard to let properties, officer time in managing shortlists
- On satisfaction surveys undertaken, customers have given an average rating of 8.3 (out of 10) for 'how easy is it to understand the bidding process' and 9.0 for 'ease of bidding via the website'.

Issues with the current policy

- CBL can be confused with the policy itself and be blamed for lots of things that it doesn't influence such as the availability of stock/increased demand.
- The word 'choice' can be felt to be misleading as there is little choice of properties.
- Some vulnerable customers may find it hard to access the system or be pro-active in engaging in their search for housing.
- There is some tension with the concept of Choice and urgent priority cases/assisted bids.
- SCC was an earlier adopter of CBL and is benefiting from reviewing how other Councils have developed their approaches
- The current ICT system was the best available at the time CBL was introduced but is now out of date and needs to be improved to manage the system efficiently, and provide better information.

Consultation Results

- 83% of people said it was easy or very easy to register.
- 78% said it was easy or very easy to bid.
- 75% liked the current system of being able to see all the available properties and register bids.
- Customers to not want to be allocated properties they have not expressed an interest in.
- 40% said they had ideas about how the CBL system could be improved. Most of these suggestions for improvement could potentially be addressed in the new ICT system currently being purchased.

Relevant Research

The large majority of local authorities use CBL to advertise and let their properties and are pleased with the way CBL operates. Many authorities have found that they no longer have a problem with low demand but this is also due to decreased stock being available. Most report voids times have been improved by enabling shortlists of customers that actually do want to live in a particular property. Majority of Councils maintain an up-to-date register that is regularly reviewed so they are confident bidders are eligible for housing and for the property they are bidding for.

Some authorities have moved away from CBL such as Barnet, Portsmouth,and Stoke. Barnet and Portsmouth have changed their policies to be far more restrictive and Barnet have reduced their housing register from around 21,000 households to approximately 750 through this process. However, it should be noted that Councils who have done this are in the minority and have far fewer properties available than Sheffield overall and as a percentage of the housing stock in their area.

Recommended Option 1 Keep CBL as the advertising and matching mechanism using

the new ICT to manage more effectively

Advantages
- An open transparent system
- Empowers customers to manage their own housing solutions
- Less staff needed to administer this system and very little officer discretion
- Fewer complaints and Members' enquiries, better customer satisfaction
- Fewer hard to let properties, less rent loss and fewer voids periods
- New ICT system will produce cost savings and efficiencies as processes will be speeded up, the ability to tailor adverts to the specific customer etc, easier to keep register up to date
- Minimal change risks as we already have CBL established in Sheffield

Disadvantages
- Customers have unrealistic expectations of choice raised
- System of allocation is confused with other aspects of policy

Option 2 – Officer Allocations of Each Property

Key Features

- Revert to system where people register interest for areas
- Officers allocate properties as they fall vacant to customers according to agreed criteria e.g. points based on waiting time/priority etc
- Properties are not advertised but a register is maintained and people matched "in turn" for each vacancy

Advantages
- Do not have to maintain process and mechanism for advertising properties
- Do not raise expectations of choice and it is clear why a property has been allocated to next applicant that fits criteria
- Easy for customers to understand reaching top of a list but would need to have policies in relations to refusals as could not have inactive people on register

Disadvantages
- Disempowering to customers - dissatisfaction at returning to officer allocation
- More staff required to deliver the service
- More MP and Member enquiries, complaints and queries when it is felt property doesn't meet need
- Less transparent and open and more officer discretion
- More hard to let properties as people will be offered they are not interested in - would need to consider penalties for refusals
- Increase in voids and re-let times, some properties will be empty for a lot longer

Business case for recommendation
- Self Financing Business Plan identifies that the new CBL system will lead to efficiencies that include the ability to restrict bidding and other IT functionality the current system doesn't have.
- CBL is popular with customers and this is born out by the consultation results attached and by customer satisfaction surveys undertaken by Sheffield Homes.