

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 produced setting out interim findings.

Members have already given recommendations on a number of the key areas identified in that report including Registration, Banding, Age Designation and Bedroom Eligibility Criteria. This report includes further 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.

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

This report contains options to consider for 3 key areas. The report sets out 2/3 main options for consideration. To help Members to consider these, officers have indicated a recommended option at this stage, which it is felt would most merit being developed in to a full Policy option. The recommended options are listed below:

1. **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.
2. **Bids** - extend the restriction to apply to all applicants, therefore restricting all applicants to 3 bids per cycle. Retain the facility for staff to place additional bids, where necessary, for priority applicants in order to fulfil Council's duty to applicants with urgent housing needs.
3. **Adaptations** - build into Policy the flexibility to take highly adapted properties out of CBL and match manually.

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 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 detailed 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, customer's 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. 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?

- 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 is 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 do 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. The 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.

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 the 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.

Officer Recommendation

Option 1: Keep CBL as the advertising and matching mechanism using the new ICT to manage more effectively

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 and by customer satisfaction surveys undertaken by Sheffield Homes.

6. Bidding

Current Policy

Key Features

- Vacant properties are advertised openly.
- Anyone who is registered can bid for an advertised property.
- Properties are advertised on a weekly cycle.
- There is no restriction on the amounts of bids an applicant can place per cycle.

What works well in the current bidding part of the Policy?

- The system is accessible and easy to use.
- Vulnerable applicants have assistance with their bidding.

Issues with the current Policy

- The current Lettings Policy was introduced at a time of low demand in many estates and because of this it allowed unlimited bids from applicants. This was to encourage applicants to consider a wide range of choices. This is no longer a tenable Policy as demand for Social Housing has far outstripped supply.
- Some applicants appear to be bidding without real consideration of whether they want to live in the property they are bidding for.
- Bids are unlimited (on average 24 bids per applicant are placed each week) and this has led to a high level of refusals.
- One applicant has successfully bid, been offered and refused in excess of 50 properties. This has led to waste of staff time and resources, prevented other applicants in need of housing being housed expediently, led to increased void times and rent loss.
- Bids could not be restricted within the current Choice Based Lettings (CBL) system due to the inability of the IT to facilitate this.

Consultation Results

- Tenant support for restricting bids was evidenced in the budget consultation exercise in 2009.
- The recent Allocations Policy Review consultation questionnaire stated the intention to restrict applicants to three bids per weekly cycle and asked whether further restrictions are needed. 65% said there should be no further restrictions. Of those who said that there should be further restrictions, some said that we should also restrict frequent refusals. A number of housing staff think that refusals should be limited, as did some tenant groups, public sector workers, RPs, a multi agency group, and an older people's group.
- Housing staff feel that restricting bids for waiting time applicants will be positive as it will help to reduce the refusal rate.
- RPs generally think bids should be restricted.
- Some interest groups (BME and older people) think that three bids is enough.
- Some think bids could be restricted to priority applicants too; others did not - a multi agency group was concerned it would take longer to re-house people if bids were restricted to priority groups.

Additional Information

- Cabinet looked at the issues raised above and in January 2010 took the following decision:

'(e) the Council's Lettings Policy be amended so that, from implementation of the new Choice-Based Lettings website, applicants other than those awarded immediate, urgent or planned priority re-housing be limited to three choice-based lettings bids per week and further analysis be carried out to assess the feasibility of extending this restriction to all applicants;

(f) the Interim Director of Housing and Regeneration, in consultation with the Cabinet Member for Housing and Sustainable, Safer Communities be granted delegated authority to determine the wording of the amendment to the Lettings Policy and the date of its implementation.'
- It was acknowledged that it would not be technically possible to implement this change prior to going live with a new CBL system.
- The Council commissioned Sheffield Homes to implement a new CBL system in 2011. The

new system will introduce a number of key features, which will positively affect the issue of the number of bids, including the capacity to display real time bid positions (see below).

- The new system will be interactive so bidders will be able to see what position they are on the list and also withdraw or move bids during the bidding cycle in order to be able to ensure they are well placed to obtain an offer. Using the current system bidders have no idea where they are likely to be successful when placing a bid, so as a result of this they may place large numbers of bids, including for properties that do not necessarily suit their requirements.
- One key area is to ensure restricting bids does not delay re-housing of priority cases. Other authorities manage priority cases by restricting bids and find this encourages people to be more focussed in their bidding. This will be helped by the greater transparency under the new system. In addition there will be the facility for additional bids to be placed by staff where necessary in exceptional cases.

Relevant Research

- Benchmarking with 16 other Local Authorities showed 13 out of the 16 authorities restrict bids to all applicants to 3 per cycle. The 3 authorities that have unlimited bids do have penalties for refusals, which is another way in which excessive bidding can be managed.
- All the authorities scrutinised have levels of priority identified within a banding system.
- 9 of the authorities advertise everything to priority first.
- 9 of the authorities do not place enforced bids.

Options

1. Keep the system as it currently is and reverse the previous Cabinet decision, therefore keeping unlimited bids for all applicants.
2. Implement the formerly agreed Policy change to restrict the bids of Waiting Time applicants only.
3. Extend the restriction to apply to all applicants, therefore restricting all applicants to 3 bids per cycle. Retain the facility for staff to place additional bids, where necessary, for priority applicants in order to fulfil Council's duty to applicants with urgent housing needs.

Option 1 – Keep the system as it currently is and reverse the previous Cabinet decision, therefore keeping unlimited bids for all applicants

Advantages

- Staff, support agencies and applicants are familiar with this system and arrangement.
- There will be no danger of priority applicants being restricted in their bidding.

Disadvantages

- Raises customer expectations and creates the impression that all properties are obtainable which is unrealistic.
- Results in higher number of customer complaints and frustration with CBL system and current Policy.
- Encourages unrealistic bidding choices/patterns.
- Does not assist applicants with making informed choices.
- Makes matching more difficult because of the large numbers of bids in the system.
- Limits our ability to further reduce vacant turnaround time and therefore rent loss.
- Wastes staff time and resources in administering a bid intensive system and multiple

refusals.

Option 2 - Implement the agreed Policy change to restrict the bids of Waiting Time applicants only.

Key Features

- Waiting Time applicants will only be able to place 3 bids per cycle.
- Priority applicants will have unlimited bids per cycle.

Advantages

- Priority applicants will be able to maximise opportunities for bidding.

Disadvantages

- Keeping unrestricted bids for priority applicants may well be perceived as unfair and could lead to applicants 'priority chasing' in order to be able to place more bids.
- Priority applicants will not be empowered to focus their bids constructively and therefore still be applying a 'scatter gun' approach, often bidding for properties they are not interested and refuse when offered.
- Around 80% of properties are advertised to applicants with priority, so not extending the rule to these applicants would not yield the predicted financial benefits

Option 3 - Extend the restriction to apply to all applicants therefore restricting all applicants to 3 bids per cycle. Retain the facility for staff to place additional bids, where necessary, for priority applicants in order to fulfil Council's duty to applicants with urgent housing needs.

Key Features

- All applicants will be restricted to 3 bids per cycle.
- Staff will be able to place additional back office bids for priority applicants, if perceived to be necessary.

Advantages

- All applicants will be able to make the same amount of bids.
- A simpler system for applicants to understand.
- The system will be easier for staff to administrate.
- The system will be perceived as fairer.
- All applicants will be able to focus their bidding.
- This system does not encourage 'priority chasing'.
- This will help focus bidding and is hoped will result in less refusals.
- Cost savings can be realised.
- Applicants will be housed quicker because there will be less wasted bids and resulting refusals.
- Applicants will only be able to see and bid on properties they are eligible for thus not wasting bids.
- Applicants will be able to see where their bid is ranking and have the ability to remove bids and place them on other properties where they are ranking higher on the short list.
- Enhanced applicant satisfaction levels and reduction in complaints.

Disadvantages

- Choice will be restricted more.

Officer Recommendation

Option 3: Extend the restriction to apply to all applicants, therefore restricting all applicants to 3 bids per cycle. Retain the facility for staff to place additional bids, where necessary, for priority applicants in order to fulfil Council's duty to applicants with urgent housing needs.

Business Case For Recommendation

- High usage of the system by customers – an applicant places an average number of 24 bids per cycle, making the system more complex and which leads to higher administration needed by staff.
- Refusal rates are exceptionally high compared to other local authorities:
 - Acceptance on first offers is 38% in comparison with the top local authority quartile operating at 52%.
- A high proportion of bids are placed for properties that applicants do not actually want:
 - 26% of offers are not responded to by applicants.
 - 20% of applicants who are made offers state they have made poor bids.This leads to wasted staff time – in terms of placing bids, matching, undertaking tenancy checks, making (abortive) offers, accompanied viewings, dealing with enquiries/customer dissatisfaction.
- High rent loss – impacted upon by higher ratio of offers per property:
 - Our rent loss in Sheffield due to a higher rate of refusals is 2.18% against a national upper quartile figure of 1.32% (Housemark definition and performance indicator).
- 22% of bids are ineligible (for size or type of property) and not all properties are allocated as advertised – 15% of the properties advertised to priorities actually go on to be allocated to Waiting Time applicants.
- Vacant rent loss could be reduced if bids were restricted across the board by improving relet times (estimated £200,000 per year). If the changes to bidding were restricted to waiting time applicants only, this would equate to a saving of £27,000 to £100,000 per year. Further work on quantifying these savings is currently being undertaken.
- Further savings may be achieved on temporary accommodation costs through homeless applicants being re-housed
- There is also potentially a reduction in the staff time required to manage refusals or no reply to offers. The initial business case for the CBL project specified a saving of 5 full time employees, equating to £125,000, but further analysis has indicated a potential saving of £187,000 per year.

7. Adaptations

Current Policy

Key Features

Section D 3d: People with mobility priority will be considered first for some ground floor flats, bungalows and adapted houses.

Section H 4: Applicants in urgent and immediate need of housing - A priority will only be given for a property that will resolve the applicant's housing need within the necessary timescale. This may not always meet all the applicant's aspirations. For example an applicant with mobility needs for level accommodation will not be given priority to move from a house with stairs to another house.

Section I 12: Moves that release a high demand property for letting

Section I 12.3: Priority will be given where:

Section I 12.3d: Their current home has not been adapted for a person with a physical disability and they are in a property that is classed as high demand (3 or more bedrooms or a bungalow with 2 or more bedrooms).

Section I 13.1: Or to a household living in a council property built or adapted especially for a person with a disability and that person no longer lives there or no longer needs it.

An applicant has succeeded to the tenancy of a property built or adapted specially for a person with special needs and they do not need that property.

Section I 15.3e: They are Service Personnel who need to move to suitably adapted accommodation because of a serious injury, medical condition or disability, which they have sustained as a result of service in the Armed Forces.

Section I 15.7: Mobility priority will be given for 13 weeks. The priority will be reviewed at the end of 13 weeks if the applicant has not been re-housed. In some instances the applicant may have specific needs for a specialist property (for example, a 3 bedroom disabled persons property or adapted house) that has not become available during the last 13 weeks. In these instances, the priority will be extended. Otherwise, the priority may be cancelled.

Section K 1.5: If someone succeeds to a property built or adapted for a person with special needs and they do not need that property, they will be given priority for a move.

Section M 2f: A mutual exchange will be refused if the property has been adapted for a person with a physical disability and is very different from an ordinary property, and if the exchange were to go ahead, a disabled person would no longer live in the property.

What works well in the current adaptations part of the Policy?

- The fact that disabled people can participate in the Choice Based Lettings system and express preferences for available properties.
- People with mobility priority will be considered first for some ground floor flats, bungalows and adapted houses.
- Priority for moving is given to people in an adapted home that don't need it.
- Priority is given to people who are in a home that is not adapted and they want to move to a property that is adapted.

Issues with the current Policy

- Adapted properties sometimes get let to people who are not disabled, this often means the adaptations are removed.
- Our current Lettings Policy doesn't identify levels of need; all priorities are in the same band. This means that someone might need a particular property with its adaptations or location urgently but the property will go to someone else because they have had their priority for longer.
- There are issues around matching highly adapted properties with an applicant that really needs all those adaptations.
- Officers are under pressure to adapt unsuitable properties.
- There is a lack of accurate information about adaptations in our stock and some adaptations are old or in an unsuitable property.
- Better definitions are required to distinguish between accessible, adapted and purpose built or highly adapted properties.
- There is a need for a joined up register with RPs and the Accessible Property Register.
- There are often problems letting adapted properties.
- The housing register could be managed to improve targeting and marketing opportunities.
- Ground floor properties need to be prioritised for people and families with mobility needs and not age banded. Age is not an indicator of disability.

Consultation Results

- In general disabled people find it more difficult to access the system e.g., registering and bidding.
- Some feel that adapted properties should be reserved for disabled people and that only disabled people should be able to bid on them. Others feel that there should be a separate list or that properties need to be set aside for a period of time before being available to general needs.
- It was suggested that we should minimise adaptations to non appropriate properties; this would require accurate knowledge of the stock and a possible amendment to the tenancy agreement to say that we won't un-adapt or adapt an unsuitable property.
- Priority should be given to people awaiting costly adaptations who should be re-housed as an alternative to doing those adaptations. This requires a cultural change in the approach of support agencies and tenants' families as often there is an expectation that family homes will be adapted for single older residents rather than being encouraged to move somewhere more suitable. Assess so entire need is met first time round.
- The Policy should clearly define criteria that will qualify for mobility priority and the evidence that will support qualification. Criteria should be listed in plain English, as should supporting evidence, and be widely publicised.
- More time to decide is needed once an offer has been made.

What the Adaptations Officer Subgroup recommended

- That we should separate out highly adapted properties
- That we should introduce levels of need to enable a focus on urgent need
- Advertise adapted/adaptable properties to mobility priority first/separately
- Review time limits to be realistic
- Formalise definitions to enable clarity for customers and advertising of properties

- Take area of support into account for all applicants
- Allow 2 or 3 offers before removing priority

Suggested definitions

Definitions

- Highly adapted – more than one adaptation and could meet the needs of most disabled people (wheelchair users).
- Adapted – properties with some adaptations - will not necessarily meet the needs of most wheelchair users.
- Adaptable - could be adapted to meet the needs of most wheelchair users.

Relevant Research

- Nine highly adapted properties became available in 2010-11 – five bungalows and four houses. None of these were four bed properties.
- Approximately 19 properties with a variety of adaptations become available each year and 1-2 bed ground floor or level access flats and maisonettes are much more readily available although not necessarily in the area the applicant would like.
- Currently 23 applicants are awaiting adapted properties. The adaptations needed include stair lifts, wet rooms, widened doorways and through-floor lifts. 3 of these are waiting for highly adapted properties, 12 for properties with three or more bedrooms.
- 87 people have been on the mobility priority for over 6 months.
- Most authorities confirm that this is a challenging and complex area of allocations.
- There is a split between authorities operating these lets through CBL and those taking them out of CBL.
- Most authorities using the newer more popular CBL system delivery modes, such as Abritas, Locator and Orchard, do operate these allocations through CBL. This appears to be largely due to the enhanced functionality that these types of system can offer in terms of identification and marketing of accessible properties. But the system will only be as good as the information contained within it.
- Most authorities do build the flexibility into their policies to match highly adapted properties outside CBL.
- Best practice would be to deliver a choice based lettings service that provides high quality information on property accessibility so that disabled people could make informed housing choices and actively participate in choice based lettings.

Options

1. Keep the system as it currently is noting that the acquisition of a new CBL system is going to provide enhanced functionality.
2. Retain and develop the adapted features already in the Policy, building in the additional flexibility to take highly adapted properties out of CBL and match manually.
3. Take all adapted properties out of CBL.

Option 1 - Keep the system as it currently is noting that the acquisition of a new CBL system is going to provide enhanced functionality

Advantages

- Members and Staff are familiar with the current Policy.
- Customers are familiar with current Policy.
- The current system will probably improve with the implementation of the new CBL system.

Disadvantages

- Fail to differentiate between urgency of housing need and re-house most urgent promptly.
- Doesn't respond to consultation feedback.
- Failure to address perceptions of fairness for customers.
- Failure to make best use of stock and resources.
- Failure to operate best value principles.

Option 2 - Retain and develop the adapted features already in the Policy, building in the additional flexibility to take highly adapted properties out of CBL and match manually.

Key Features

Gives the flexibility to remove highly adapted properties and match them to a person that really needs those adaptations.

Advantages

- Most urgent need is matched to appropriate available property.
- Efficient use of resources.
- Those that find it difficult to access and use the system will not need to worry as this approach is officer led.

Disadvantages

- Applicants will be excluded from making the same decisions about where they live through choice based lettings as other housing applicants.
- There will be a loss of transparency.
- Possible perceptions of unfairness.
- Potential for voids times to rise if not tightly managed.
- Relies heavily on officers and officer led approach.
- Resource intensive in terms of staff time.
- Open to discretion.
- Potential increase in enquiries and complaints.

Option 3 - take all adapted properties out of CBL

Key Features

- Take all adapted properties out of CBL and offer them manually.
- Matching applicants needs to properties available.

Advantages

- Those that find it difficult to access and use the system will not need to worry as this approach is officer led.
- May prove easier to match applicant's needs to available adapted properties.
- Possible cost savings in matching appropriately but would also need to be a timely process.

Disadvantages

- Applicants needing adaptations will be excluded from making the same decisions about where they live through choice based lettings as other housing applicants.
- There will be a loss of transparency.
- Possible perceptions of unfairness.
- Potential for voids times to rise if not tightly managed.
- Relies heavily on officers and officer led approach.
- Resource intensive in terms of staff time.
- Open to discretion.
- Potential increase in enquiries and complaints.

Officer Recommendation

Option 2: Retain and develop the adapted features already in the Policy, building in the additional flexibility to take highly adapted properties out of CBL and match manually.

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.
- Adopting this option will allow the Council the maximum amount of flexibility and control over lettings to this group.
- This option doesn't mean we have to directly match but gives that option.

Lettings Policy Review Consultation Report - Adaptations and the Mobility Priority

External consultation about adaptations and mobility priority was undertaken with interest groups including Choices not Barriers and the Access Liaison Group (meetings and individual responses from members), Registered Providers¹ (RPs) and multi-agency groups. Internal consultation took place with housing staff from Sheffield City Council and Sheffield Homes and the Equipment and Adaptations Service via a series of meetings and a workshop. Responses from the Lettings Policy review questionnaire have also been used.

Overarching issues include the supply of adapted properties and within this, the need to ensure that properties are allocated to the applicants most in need of their adaptations. The Lettings Policy could help to address some of the matters raised. Other issues and potential changes are not policy related and these are covered in the Appendix.

1. Supply and demand

- 1.1. Housing staff say that lack of availability and choice is a key issue; that very few properties come up for people requiring a high level of adaptations, and that housing families where there is disability is very difficult, as is finding larger adapted properties. People with complex or specific needs often have their mobility priority for a long time.
- 1.2. While we have many properties that have been adapted to a lesser degree, they are often not in a location which suits the customer, and we have trouble letting some of them. This leads to rent loss and means that sometimes properties are let to general needs and the adaptations are subsequently removed (workshop).
- 1.3. It was also pointed out that some adaptations are not suitable for future users because the property has been partially adapted for the previous occupant but is not suitable for further adaptations; or they are very specific and therefore don't meet the needs of current applicants (housing staff, workshop).
- 1.4. Where there are major adaptations, all efforts are made to let to disabled people who need them, and Sheffield Homes' Vacants Management Service, Sheffield City Council's Health and Housing team and the Equipment and Adaptations Service work together to this end.

2. Issues and suggestions raised in the consultation

- 2.1. There is a general feeling that the way we let adapted properties is too basic and needs to be refined (housing staff; workshop). Some

¹ Formerly known as housing associations

members of interest groups think that the entire system needs an overhaul rather than individual parts of it.

2.2. The key issues raised in the consultation are as follows:

- We can't always ensure that an adapted property is let to someone who needs it the most -
 - the current Policy doesn't take levels of need into account
 - we don't separate out highly adapted properties
 - our system of reserving adapted properties to those who need them could be improved
- We lack the tools needed to help us to do the above effectively and the following would be useful:
 - a definition of adapted properties
 - promoting joined up working with other housing providers via the use of a register of adapted properties (see Appendix)
 - better information about our adapted properties and information provision (see Appendix).

2.3. Other issues include:

- Mobility priority:
 - how we should treat bidding and refusals
 - time limits on the mobility priority
 - self-referral for the mobility priority.

3. Levels of need

3.1. It was noted that the mobility priority within the Lettings Policy is very general and doesn't recognise levels of need. It works on date alone, which means that if two applicants bid on the same property, the applicant with the earlier priority date will be allocated it, even if the other applicant has more need for that particular property. It was felt that differentiation between levels of need could help us to better meet people's needs (housing staff; workshop, questionnaire).

4. Highly adapted properties

4.1. There is no provision within the Policy to treat highly adapted properties, or an applicant who requires such a property, differently. Where an applicant needs a very specific type of property, or where a highly adapted property has not been let and we want to ensure it goes to someone who needs it, teams may work together to find a suitable property/applicant and then let the property via a discretionary decision.

4.2. Highly adapted properties are a very scarce resource which need to be treated differently. It was suggested that the separation of highly adapted properties could be formalised into the Lettings Policy (housing staff; workshop; interest group). This requires a distinction between adapted and highly adapted properties (see 5).

- 4.3. Some suggest that highly adapted properties should be removed from Choice Based Lettings (CBL) and matched to the applicants' needs (housing staff). Others feel that applicants should still have choice and that these properties should be retained within CBL but in a separate pool from general lettings (multi agency group). Some favour a people-based rather than a property-based approach, wherein we treat people with more specific or complex needs, who currently take a long time to be rehoused, differently, and identify appropriate properties for them (housing staff). Occupational therapists thought that it would make sense to work from a list of potential applicants, so that where they had identified that a property was not suitable for a particular applicant, they would then be able to consider whether it would suit the needs of others.
- 4.4. Some think that it would be the best use of resources to remove all adapted properties from general lettings (questionnaire; staff).

5. Definition of adapted properties

- 5.1. The criteria we use to define adapted properties are too basic and there is a need for a definition of adapted properties to be let to people with recognised needs. It should distinguish between 'adapted' and 'highly adapted' (or 'very/fully' adapted) properties. This will help us to meet people's needs better. This has links to an improved IT system which will be able to provide better information on advertisements, as needed (interest group, housing staff, workshop) (see Appendix).
- 5.2. The Lettings Policy currently says, 'People with mobility priority will be considered first for some ground floor flats, bungalows and adapted houses,' (Section D – Letting Criteria). This is quite general and also means that properties can be let to general needs if no one with mobility priority bids.

6. Reserving to people with mobility priority

- 6.1. The Lettings Policy currently says, 'People with mobility priority will be considered first for some ground floor flats, bungalows and adapted houses,' (Section D – Letting Criteria). This is quite general and also means that properties can be let to general needs if no one with mobility priority bids.
- 6.2. This could be strengthened so that adapted properties are reserved to people with mobility priority, and that only people who need them are able to bid on them (housing staff, interest groups, questionnaire). Some feel that this should be for a set period of time rather than indefinitely (housing staff; interest group member). It was also noted that properties which are relatively accessible, and could be adaptable, such as ground floor properties, should be prioritised for mobility needs (housing staff; workshop).

- 6.3. A questionnaire respondent felt that people with mobility needs not urgent enough for a priority should be able to bid for adapted properties that suit their needs with waiting time.

7. Mobility Priority

7.1. Bidding

The questionnaire showed that disabled people are more likely to find bidding difficult, however forced or assisted bids are not popular with customers and often result in refusals (interest group, questionnaire). A more flexible approach which is responsive to the needs of the individual was suggested (interest group).

7.2. Refusals

Refusals lead to rent loss and mean that it takes longer for people to be rehoused. An interest group was keen to point out that refusals often come about as a result of a lack of information rather than the applicant being overly selective, and also said that properties that are inappropriate for the applicants' needs are sometimes offered (this was also mentioned in the questionnaire). Better information provision would help to reduce refusals (housing staff; interest group) (see Appendix). An interest group also felt that we should have a better understanding of applicants' needs before making an offer of a property (see also 7.5).

- 7.3. As with other priorities, people with mobility priority sometimes refuse an offer of accommodation because it is in an area that they would not have chosen and is at a distance from areas of familiarity and support, which can be particularly difficult for disabled people. People with severe mobility problems sometimes use their waiting time to bid rather than seeking a priority because they don't want to be constrained by it (interest group, housing staff). It was suggested that the Lettings Policy should recognise a degree of area choice for people with priority, but it should be wide enough to be realistic. It was noted that this may not be possible where people require highly adapted properties (interest groups, housing staff).

7.4. Time limits

The mobility priority is a 13 week, 'planned' priority. Many think that 13 weeks is not now long enough to find a suitable property. An interest group think that applicants should retain mobility priority indefinitely unless the condition changes or they choose to give it up (interest group member).

7.5. Self-referral for mobility priority

One interest group feels strongly that housing and other professionals have a gatekeeper role in housing allocation and that they lack full understanding of people's health conditions. For this group, individuals should be able to self-refer for mobility priority, presenting evidence provided by medical and other professionals, where needed, to support their application; and with access to advocates where needed. It is felt

that only the individual can say what the impact of their condition is and therefore they are best placed to self-refer.

8. Conclusion

We can't ultimately increase or change the stock that the Council currently have but we can manage the resource more efficiently. We can also give more holistic housing options advice and better information to customers. This will help manage their expectations and provide more realistic housing solutions.

Some of the issues raised in this consultation can be rectified with the introduction of the new IT system. The new system has much more capacity and functionality and will help combat issues such as quality of description, matching capacity as fields can be detailed to include property specification and customer requirements. These can potentially be matched much more accurately through the new IT system hence shortlist applicants that don't meet the specific criteria much lower down the shortlist.

A new Policy gives the opportunity to prioritise cases more as Scrutiny have already agreed to look at a banding system that prioritises applicants. The new Policy could also affect waiting times of applicants with mobility issues as urgent cases could potentially be housed more quickly. There is the capacity to totally review waiting times and either make them more realistic or manage cases in a different way. A new Policy also gives the opportunity for highly adapted properties to be managed in a different way.

APPENDIX – NON-POLICY ISSUES

Non-Policy issues that came out of the consultation are as follows:

- Information
 - property information
 - information provision and access
- Partnership working
- When and where to make adaptations
- Means testing
- Customer process
- Rent loss
- Supply of accessible housing

Information

We need better information about our adapted properties; and to share this information via property advertisements on an improved IT system.

It was widely agreed that it would benefit customers and staff if we had better, more detailed information about both Council and Registered Providers' adapted properties, and this should be updated regularly. Housing staff and others noted that we need to know about adaptations that are no longer fit for purpose; that are not the right adaptations; and that an accurate and shareable recording system is needed (see also partnership working). We also need to know more about properties that could be adapted (workshop, housing staff, interest groups). It was suggested that we should also find out more about our customers' needs (workshop, interest groups, RP).

Disabled people and their carers would like to see more information in the property adverts, which they feel will reduce refusals and rent loss (interest groups, questionnaire). Staff agree that more and better information is needed. Our current IT system is unable to hold detailed information about properties, which affects the level of detail within the advertising (workshop, questionnaire). Some of the advertisements that state 'people with mobility priority will be considered first' are for properties that are not appropriate for people with this priority (housing staff; other internal).

This lack of detailed and correct information can mean that customers are offered and visit properties that are not suitable for them. It was suggested that information about room sizes and corridor widths can save a wasted visit (interest group, staff). This would also be useful for staff. Questionnaire results listed reasons for refusals and respondents who identified themselves as disabled listed several reasons including being offered an unsuitable property – reasons for which included too many flights of stairs.

RPs suggested that improved targeting and marketing is needed. Although there is a link to the Accessible Property Register on Sheffield Homes' Property Shop website, an interest group felt that a search option for adapted properties on the Property Shop website would be helpful.

A register of adapted Council and RP properties was proposed, so as to identify all available housing to meet the needs of disabled people. This could be via the promotion of the Accessible Properties Register, which Sheffield Homes already uses (workshop, interest group, housing staff, questionnaire). It was also suggested that we should keep a register of disabled people seeking housing so people could be kept informed when properties become available (questionnaire; housing staff).

Around one third of people who responded to the Lettings Policy review questionnaire identified themselves as disabled (with a quarter of these saying they need an adapted property). Analysis of the results shows that people who identify themselves as disabled are much more likely to find access to the system, e.g. registering and bidding, difficult. They were also more likely to respond via a paper copy than online, which may be due to a lack of access to a personal computer.

Partnership working

All agreed that the lack of joined up working leads to both gaps and duplications. These are partly caused by the use of different IT systems, which makes information sharing difficult (workshop; housing staff; other internal), and could be aided by better communication. But some practices were felt to be positive, for instance in working together to allocate highly adapted properties. The need to work in partnership with RPs was also mentioned (workshop, interest group, housing staff).

When and where to make adaptations

An interest group noted that adapting the existing property should always be the first choice. Staff felt that although it is a difficult issue, we should be able to minimise adaptations to properties that are not suitable, for instance where the property is at the top of a hill, the applicant lives in an upper flat, or a single applicant lives in a family home. They said that where adaptations are made in unsuitable locations, they will later be removed and that this doesn't make financial sense (workshop).

Staff said that we need to be able to define what we will and won't adapt; possibly via the tenancy agreement, so that unsuitable properties are no longer adapted. Some hope that this will be included in the review of tenancy conditions (workshop).

It was suggested that more should be done to incentivise moves in these cases. A specialised version of the Smart Move (under occupier) initiative for adapted properties was recommended (workshop, housing staff). An interest group felt that incentives were irrelevant. An RP thought that priority to move should be given to people who require adaptations, for instance single residents living in family homes, but added that this would require a shift in expectations.

At the workshop, staff said that where adaptations have been provided, we should be able to restrict the tenant from moving and then requesting more

adaptations for a set period of time, as long as their circumstances haven't changed. Where the adaptations in a property are no longer needed, some housing staff said that we should require people to move.

It was noted that we should only adapt properties that would be suitable for further adaptations at a later date, whether for the potential worsening of the existing/prospective tenant's condition or for a future tenant (workshop, interest groups). Housing staff suggested designating all adapted properties so that adaptations can't be removed.

Means testing

Some staff suggested the introduction of means testing for adaptations. Other staff felt this wouldn't be worthwhile as it is unlikely to bring in much money.

Customer process

Staff felt that the process can be long drawn out for the customer, who is unable to bid while waiting for checks by occupational therapists, but if the property turns out not to be suitable, they have to begin the process again (workshop).

Both interest groups and staff felt that more time should be allowed for disabled people to make an informed decision about whether to take a property. It was noted that extra time should be built in so that people can make sure that the local neighbourhood has the necessary support structures and facilities in place for them, and that it may also be necessary to discuss the decision with a carer first. It was felt that while some rent loss would be involved, it would create a more positive housing outcome.

Rent loss

It was noted that properties shouldn't be adapted until a tenancy is signed, but once this takes place, the rent commences, so there is a gap before the new tenant can move in. There is some debate about who should pay for this, and at one point there was a draft procedure that said the Council would pay for six weeks then Social Services would take over; although this was not signed off (workshop).

Supply of accessible housing

An interest group member suggested that to improve the supply and range of locations of adapted stock in social housing that RPs could buy adapted properties that come up for sale in the private sector.