



TRAFFORD  
COUNCIL

# Trafford Council

## Draft Housing Allocations Policy 2018

### Consultation Feedback Report

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## Consultation Feedback

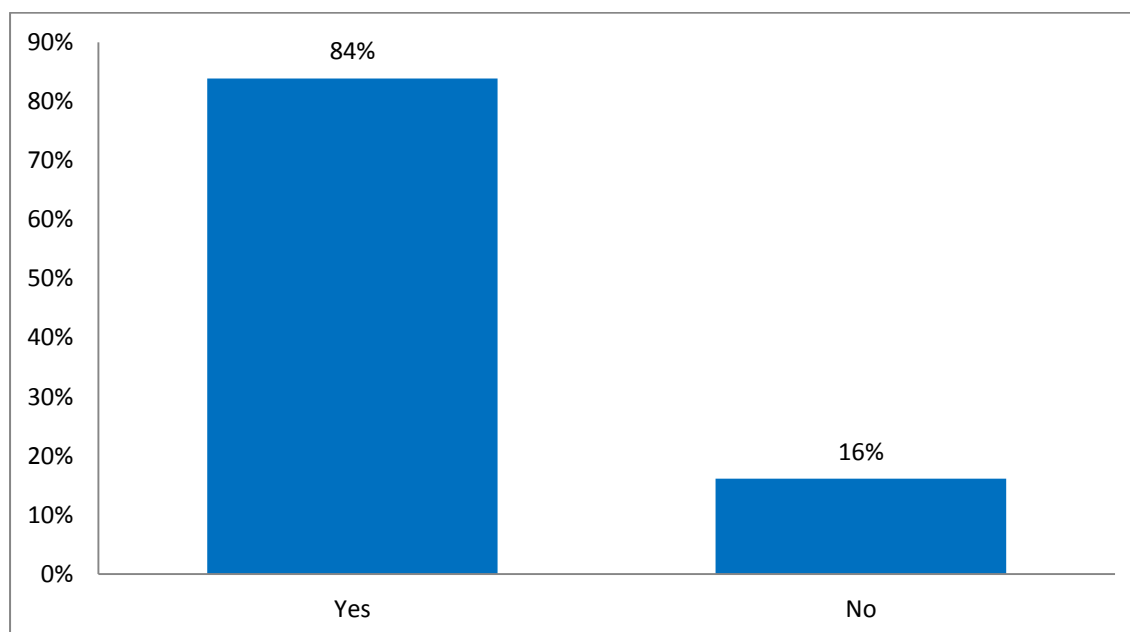
Trafford Council undertook a period of public consultation to obtain views, comments and feedback from residents, tenants, partners and key stakeholders on the draft Housing Allocations Policy 2018

This report details the comments and feedback received during the consultation period. Formal consultation began on the draft Housing Allocations Policy on 13<sup>th</sup> August 2018 and ran for a period of 6 weeks. An on-line questionnaire was available on the Council's website and an email was sent to all those applicants on the Council's Housing Register along with weekly publicity on Facebook and Twitter to raise awareness about the consultation and encourage individuals to complete the on-line survey.

## On-line Questionnaire responses

This consultation summary report details the responses received via the on-line questionnaire. 32 surveys were received during the consultation period. Analysis and these responses are detailed below.

### Question 1: Do you agree that statutory homeless applicants should be in the highest Band (Band 1)?



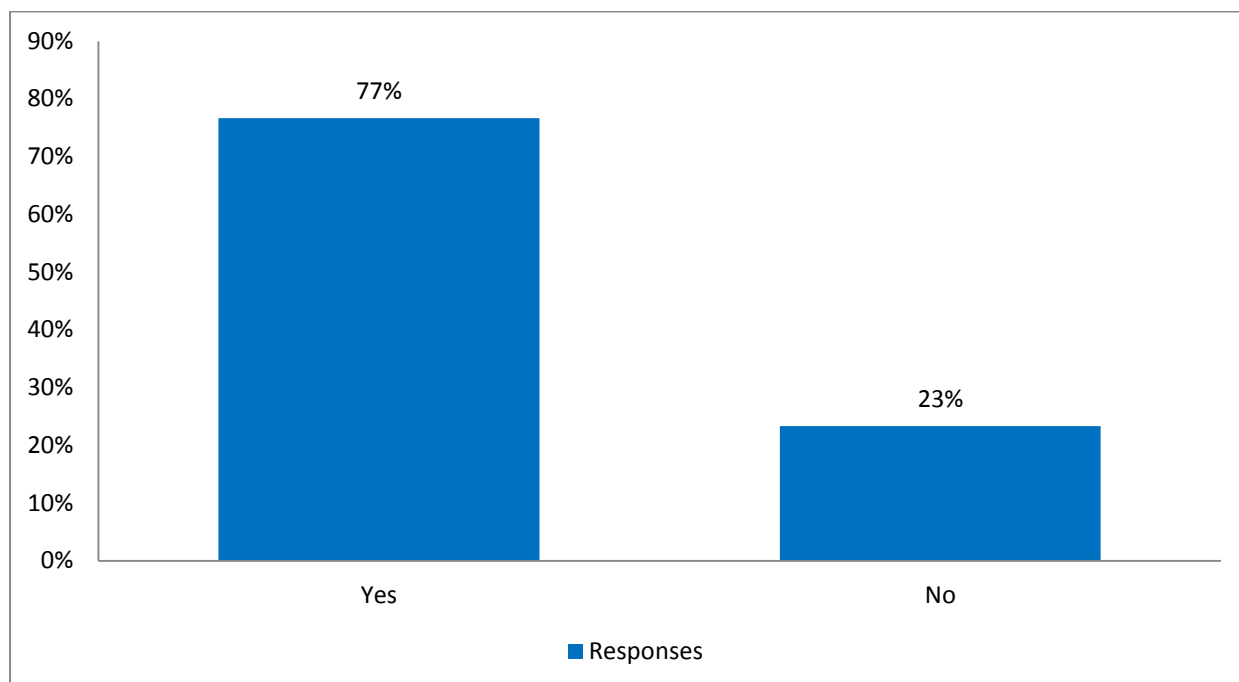
84% of the responded agreed that statutory homeless applicants should be in the highest band. Comments made in relation to this question are detailed below:

I have put no but mean unsure as everyone's circumstances are different and that other applicants who want to move may not be able to because the homelessness has saturated any chance of getting a home. I know that legislation will drive the council to reduce homelessness but there are other applicants who would like to move too and have exceptional circumstances too.
I'm currently homeless in temporary accommodation awarded full homeless duty yet I'm in band two and have been since January I bid weekly but still hitting positions 32-45
But only in cases where the homelessness is not intentional or through own actions.
I feel that the many areas have to be exhausted in checking on why a person is homeless. Indeed there are genuine cases and far too many. But Disabled people that are homeless should be given some Priority when Banding is being applied.
All homeless applicants. Single males with no dependants are normally turned away. Even recently with the law changing.
People who are to become homeless should also be a high band to prevent families being homeless you shouldn't wait until the person is homeless prevention is better than cure. It's not right than bidding for properties gets you nowhere until you are actually homeless do you take into account the emotional effect on young children being moved out of an area schools etc. temporarily for them to then have to move school again when permanently housed.
I feel that having a home is a basic human right. I also believe that homeless single men are poorly served in Trafford.
Unless they have purposely made themselves homeless.
It's the definition that needs looking at. A person that doesn't present as a band 1 candidate to start will do within a short period as strain of being homeless impacts on their mental health. Also those with cognitive issues may struggle to explain their situation so this could means candidates are overlooked.
Increasing the Band may not result in applicants being rehoused quicker as the supply/demand issue will remain and there is a need for the Council, via HOST to manage customer expectations.

### Response

The Council is pleased that respondents agreed that statutory homeless applicants should have the greatest priority and be awarded Band 1. Currently applicants who are statutory homeless are in Band 2 and therefore the proposed change to increase this to Band 1 will go ahead.

## Question 2: Do you agree with the proposal to have those applicants in the Relief Duty placed into Band 2?



77% of the responded agreed that those applicants placed within the Relief Duty should be placed in Band 2. Comments made in relation to this question are detailed below:

Put no but really mean unsure as not too sure what relief duty of care mean? In what regard as part of the homelessness act. Therefore I cannot make a comment without knowing further details.
Sometimes a property may be unsuitable size. For example, 3 bed made up of 1 single and 2 doubles for a family of 6.
Same comments to this question as number 1. But with there should be more Hostel Accommodation
Bidding should not be banded at all it should be done on who is in need because unless you're in band 1 you are never going to get anywhere with any other band let's face it.
It's not clear to a lay person what relief duty means, therefore I cannot answer this question.
Council hasn't the available housing to offer 6 months accommodation to applicants. Who wrote this survey quite clearly doesn't understand the causes of homelessness and why the problem isn't being solved.
More important to resolve situation of people faced with immediate homelessness (or within a few months) than to free up under-occupied properties.

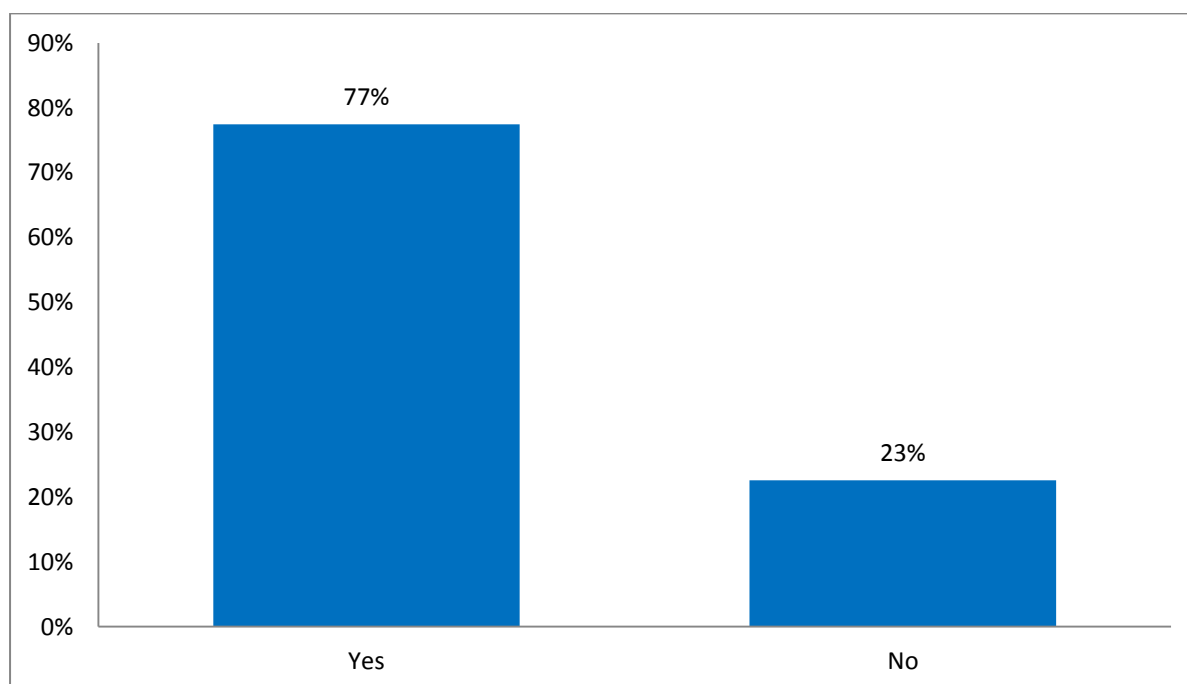
### Response

The Council welcomes respondents' views with regards to applicants within the Relief Duty being placed within Band 2.

Relief Duty is defined within the Allocations Policy as '*Applicants who are owed the Relief Duty and meet the legislative requirements under the Housing Act 1996, as amended by the Homelessness Act 2002, and The Homelessness Reduction Act 2017*'.

The Council's duty is to assist the applicant in securing accommodation for a minimum of 6 months, this accommodation doesn't necessarily refer to social housing as accommodation can be secured within the private sector.

### **Question 3: Do you agree with the proposal to have those applicants in the Prevention Duty placed into Band 3?**



77% of the respondents agreed that those applicants within the Prevention Duty should be awarded Band 3. Comments made in relation to this question are detailed below:

If prevent means cautionary but without serious risk to the applicant then yes this is fine to be in band 3.
Have you ever bid for a property in band 3?
If we do not strive to prevent homelessness then what is the point of this?
Please read my previous answer. You can create a selection strategy until you figure out the affordable and social housing debate. The HRA team needs dismissing and a new team needs recruiting Who are the HRA team?
Would prefer to see them in a higher Band as close to homelessness

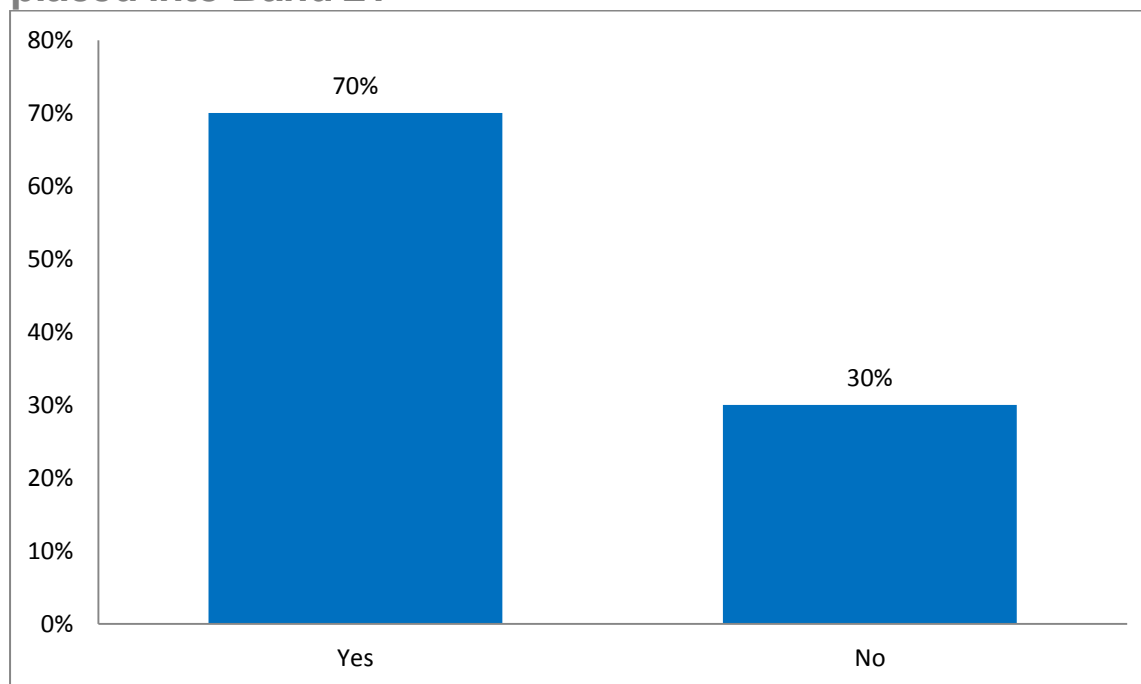
### Response

The Council welcomes respondents views with regards to applicants within the Prevention Duty being placed within Band 3.

The prevention of homelessness can mean securing alternative and more suitable accommodation as well as keeping them within the existing home. Where alternative accommodation is required, Band 3 would be awarded to enable applicants to bid for more a suitable property.

Housing Options Service Trafford (HOST) provide the housing and homelessness service for Trafford.

### Question 4: Do you agree with the proposal to have those applicants in the Prevention Duty and have been working successfully on their Personal Housing Plan (PHP) for 28 days placed into Band 2?



70% of the respondents agreed that those applicants who are within the Prevention Duty and have successfully engaged with their Personal Housing Plan (PHP) after 28 days should be placed into Band 2.

Comments made in relation to this question are detailed below:

No disagree as these criteria could possibly fit all applicants who would want the same opportunity to move to another home and in some ways seems a bit unfair. As stated earlier due to homelessness saturating the social housing opportunity is not given to others. Applicants would like to move sometimes not out of choice but can be trapped in circumstances outside of their control for a very long time as the council will be focusing on one issue which is homelessness.
No I feel like that's simpler I had to wait longer to move to band two so I think it should be circumstance considered
They should go to band 1 and be rehomed if they are on a homelessness prevention plan
It's all timely when you're a family waiting to be housed unless in band 1 anything else is an unsuccessful plan. Bidding on a property in band 2 reaching 5th-10th on the list realistically you have to have 4-9 people refuse the property before you are ever going to stand any kind of chance
Surely if they become homeless they will go back into band one so what is the reasoning for this?

This is ridiculous. A PHP plan?!?

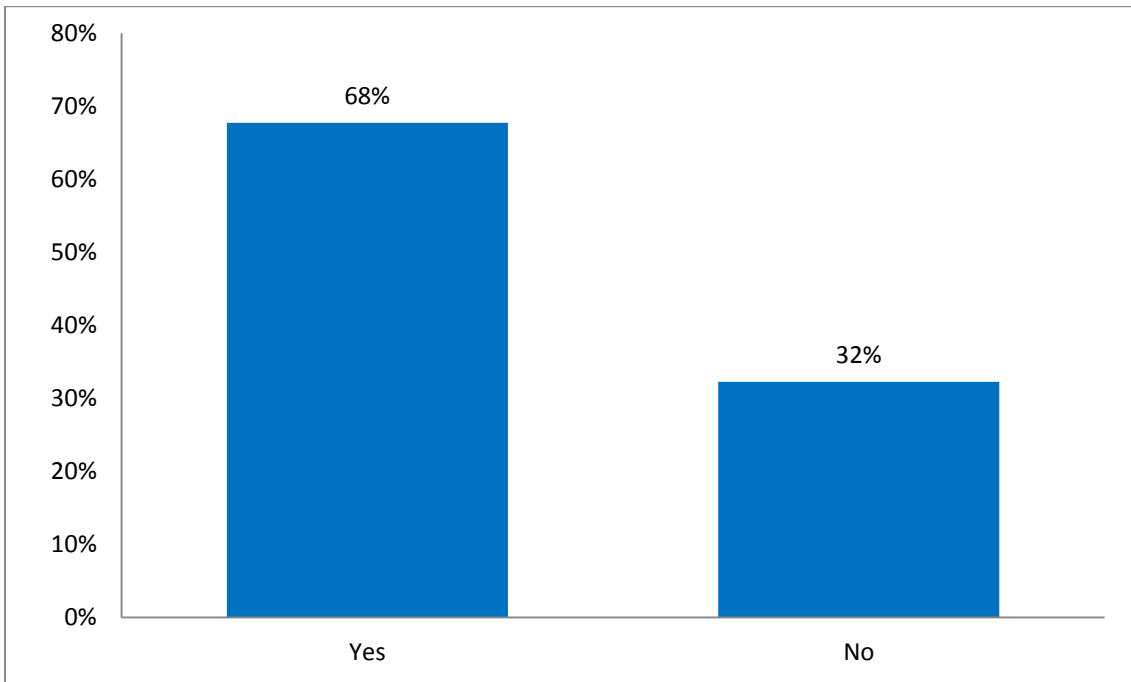
All PHPs will contain realistic expectations regarding the re-housing of applicants via Trafford Home Search.

**Response:**

The Council thanks those that responded and the comments made in relation to this question. The Allocations Policy has been established to ensure that the allocation of priority in the form of a Band is done fairly. Those applicants who have been assessed as being statutory homeless will be placed in Band 1. Other applicants will be either in a Relief or Prevention Duty and so placed in Band 2 or 3 accordingly.

A PHP has to be undertaken with all homeless applicants as per homelessness legislation (Homelessness Reduction Act). The PHP is a series of actions in which the Council and the applicant undertake to resolve a housing or homelessness situation.

**Question 5: Do you agree that the Exceptional Circumstances Award should be limited to 12 months?**



68% of the respondents agreed that exceptional circumstances should be limited to 12 months. Comments made in relation to this question are detailed below:

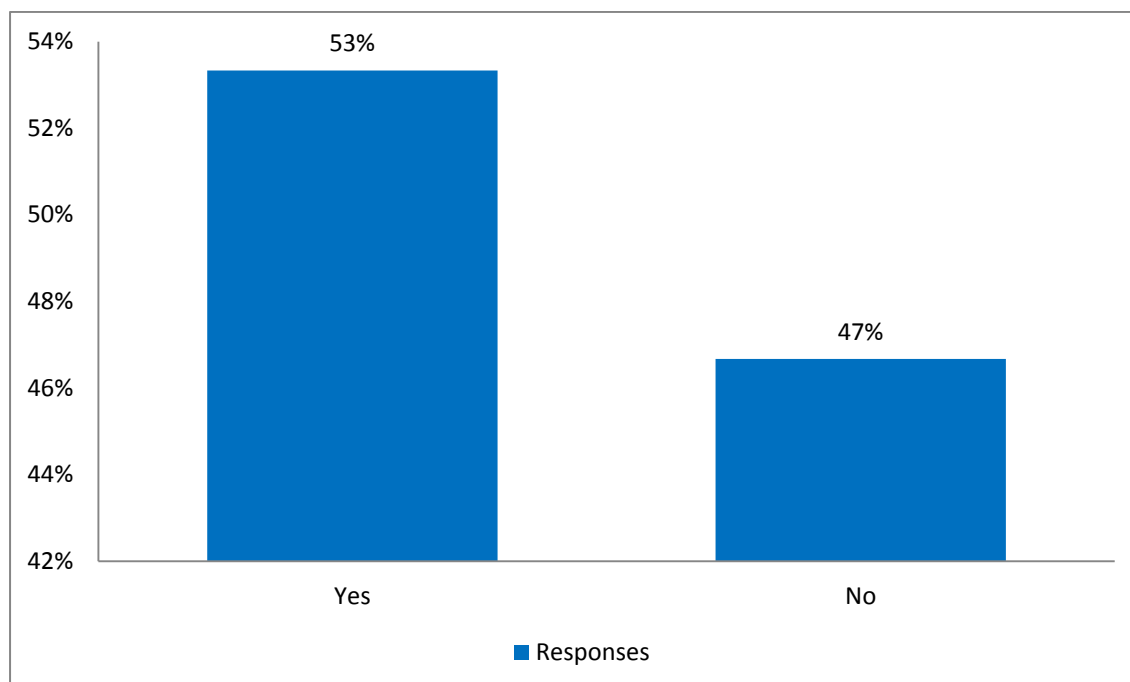


I'm not sure really and can't give an answer. It can be limited to 12 months and what happens after. Will the applicant revisit again under the same circumstances and be awarded another 12 months.
6 months.
What are we classing as Exceptional circumstances? That Award should be changed to less than 12 months if it's exceptional
If the exceptional circumstances award can be realistically achieved in the sense of you are going to place them 10th every time they bid then that's not an achievable exceptional circumstance is it?
This will stop people waiting for the ideal property.
With the proviso that it is reviewed prior to the exceptional circumstances category being removed.
No I don't.
In principle yes, but this should depend upon the circumstance and whether there has been anything suitable to offer the individual. It should be essential for the customer to have regular contact from HOST to reassess their circumstances, their requirements, and the level of risk to them remaining in their current accommodation. Applicants in this band should be contacted at least every 3 months and notified if their award is nearing 12 months and what the consequences are.
I don't think it should automatically be cancelled after 12 months, although a review may be appropriate.

**Response:**

The Council is happy that respondents agreed that exceptional circumstances award should be limited to 12 months. Currently there is no limit to this award. If after 12 months the circumstances are still apparent or changes have occurred, this will be re-assessed if required.

## Question 6: Do you agree with the one offer rule?



53% agreed with the 'one offer rule', however 47% disagreed with this proposal.

Comments made in relation to this question are detailed below:

If this is for homelessness yes, for the other applicants I think you need to be categorically clear that homes that are offered are under this rule and what happens next. Does this mean that the applicant gets down banded under the same circumstance as before. No one knows what a home looks like before they go, so it's very difficult just to leave it at 1 offer. For homeless people there is limited choice therefore they understand this.

I feel this isn't fair some people may be awarded a property that was suitable when they nodded but their circumstances could have changed and in my case my host worker bids on properties that I won't be living in due to abuse yet he will bids on them so if o ever got one I wouldn't accept.

Yes And No because to be offered a property in these times one is so lucky but I would use in Exceptional Circumstances this may be wrong or dangerous for Children and or a family to be within a certain area due to circumstances so there has to be some greater understanding again Exceptional Circumstances.

Depends on circumstances, mental health, local connections, being placed near family etc.



No it should be background based they may be a good reason someone has refused an offer you never know your be person centred based.

Again this should stop people "cherry-picking".

Whilst I understand this there can be a number of reasons that a one offer policy is setting the applicant up to fail. The focus should be on ensuring that the offer will lead to a sustained tenancy and not social dumping.

If in need of social housing then any offer should be accepted. Should Not be able to pick and choose a desired location.

Problem is that most of the social housing or low cost accommodation is of a poor standard so I understand why some reject the properties they're offered. I've visited properties that are quite clearly unfit for human habitation and the property was occupied by a disabled person and her disabled son.

While Trafford Housing Trust acknowledge that refusal of offers creates delay (on average 30% of THT offers made are refused, but this includes offers to existing Trust tenants to transfer to another Trust property) and workload, we recommend that two offers.

Recent analysis of THT data indicates that a significantly high number of THT tenants, rehoused via HOST nomination panel, have reduced tenancy duration. The average tenancy duration for applicants rehoused via nominations is 1.6 years, compared to an average of 9 years overall.

The absence of choice at the nominations stage is demonstrably impacting on the stability of tenancies in the first two years. Reducing choice will exacerbate this further. We aim to support customers to sustain their tenancy but if they are not rehoused in the right home but accepted the home because it is their only choice, this is difficult to achieve.

It must be made clear to applicants on application, and when they are bidding, how many offers they have. There is an onus on RSL's to ensure adverts are specific and detailed. However, the current Trafford Homesearch has limitations, and consideration must be given to providing clear, easily understood information to the applicant in the advert, particularly when this can impact on a decision to suspend an applicant's application.

The Trust acknowledge:

- a) that the Council has agreed that those applicants with children at GCSE year will be considered to ensure an appropriate offer of accommodation is provided.
- b) that the Council has agreed a 12-month time limit before applicants can re-apply to go back onto the register following cancellation of their application
- c) that a review panel will be established to consider appeals for applicants removed from the Housing Register following refusal of a suitable offer. The panel should be in line with the exceptional circumstances panel and have the same representatives from the Council and HOST – the Trust requests that a representative from the Housing Providers is involved.



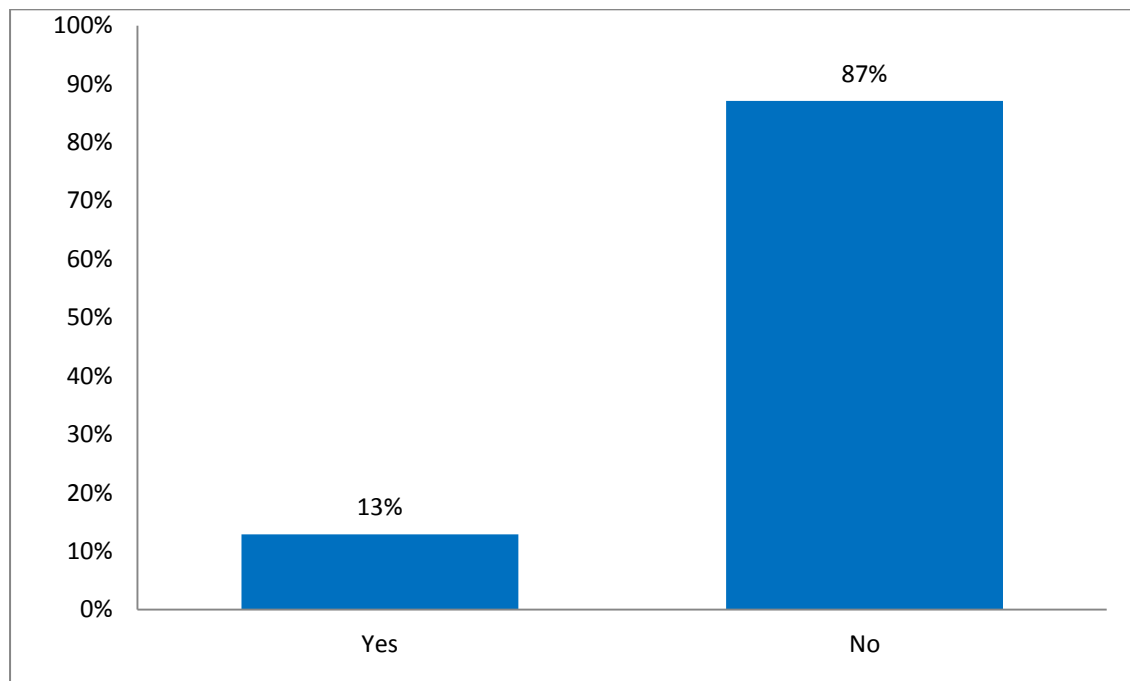
I am speaking of my own circumstances as someone bidding from the list and not someone facing immediate homelessness. There are all sorts of problems which can arise as one has not seen the property when bidding and has very little information. Extremely frequently information supplied is wrong especially in terms of nearness of facilities, and also transport which changes rapidly and does not appear to be updated. Often irrelevant information is supplied (e.g. number of nearby schools for elderly people's flats) but almost no information about the actual property. One property I saw was on the first floor and I had read elsewhere that it had a lift but this was not the case. I need to be ground floor if no lift. Lift information needs to be included but is not (Pinpoint does include it). It is not always available from other sources. (I was not in fact offered the property.) Another situation which interests me personally is a property with a major road immediately outside, busy and noisy all night. I have never been in those circumstances and am unsure if I could cope - however a flat on the side of the building not adjacent to the road might be fine - but I don't know at the bidding stage in which part of the building the flat is located. Also I have a medical need for a bath (not shower) and that is often not indicated in the information supplied. People will probably be living for a long time in this accommodation and should be treated as human beings in my view. Outside of this situation one would not be expected to decide on living in a property without seeing the inside of it.

#### Response:

The Council acknowledges respondents concerns regarding this proposal. Currently applicants can refuse an unlimited number of offers of accommodation and the Council needed to introduce a limit to reduce the staff time at HOST, within each RP and also to eliminate applicants from waiting on the register for that 'perfect' property in the desirable area. The proposal was also introduced to try and ensure that applicants were only bidding on those properties that they were interested in rather than all properties and then refusing which in turn is wasting staff time and also stopping others from being successfully re-housed.

In light of the comments and concerns the Council is proposing that the one offer rule is changed to a three offer rule to allow more flexibility and choice. This three offer rule will allow applicants to refuse up to three offers of accommodation before being removed or suspended from the Housing Register.

## Question 7: Under-occupying has been down-banded will this affect you?



87% of the respondents stated that the proposal to reduce priority for those under-occupying would not affect them. Comments made in relation to this question are detailed below:

You won't be successful in asking these applicants to move on and the down banding will reduce chances.
I feel this is a wrong move as with the effects of the bedroom tax and the lack of family properties under occupation needs to have a case by case priority status. If someone is falling behind on rent because of the bedroom tax then they could be in danger of becoming homeless. Plus their move would have the potential of releasing a property for a family or someone with a 2/3 bed need.
You should only be able to occupy a property to suit your needs. Paying for a spare room should not be allowed. I have neighbours who only required 2 bedrooms but occupy a 3 bed roomed house.
I'm not homeless and never have been but I've volunteered in the sector for many years.
This will affect our customers, as the impact of benefit reform continues, and current tenant's circumstances do change, at which point they become subject to the bedroom tax and can no longer afford to live in their home. For example, when a single working person in a 2 bed property loses their job, or there is a death in the household which results in a spare bedroom. While the majority of



tenants severely affected by the introduction of the bedroom tax have already moved, people are still affected due to these changes in their circumstances.

The Trust continues to recognise under-occupation as a priority for rehousing tenants. Please note that the Trust's Allocation Policy and Internal Transfer Policy will be reviewed in 2018.

We recognise that the Council have made contact with the Revenues & Benefits Team to determine who is currently in receipt of a DHP for under-occupancy. The current figure of 39 is low and was felt not to be a cause for concern by the Council but as outlined above, individual circumstances change and customers previously unaffected regularly continue to become affected.

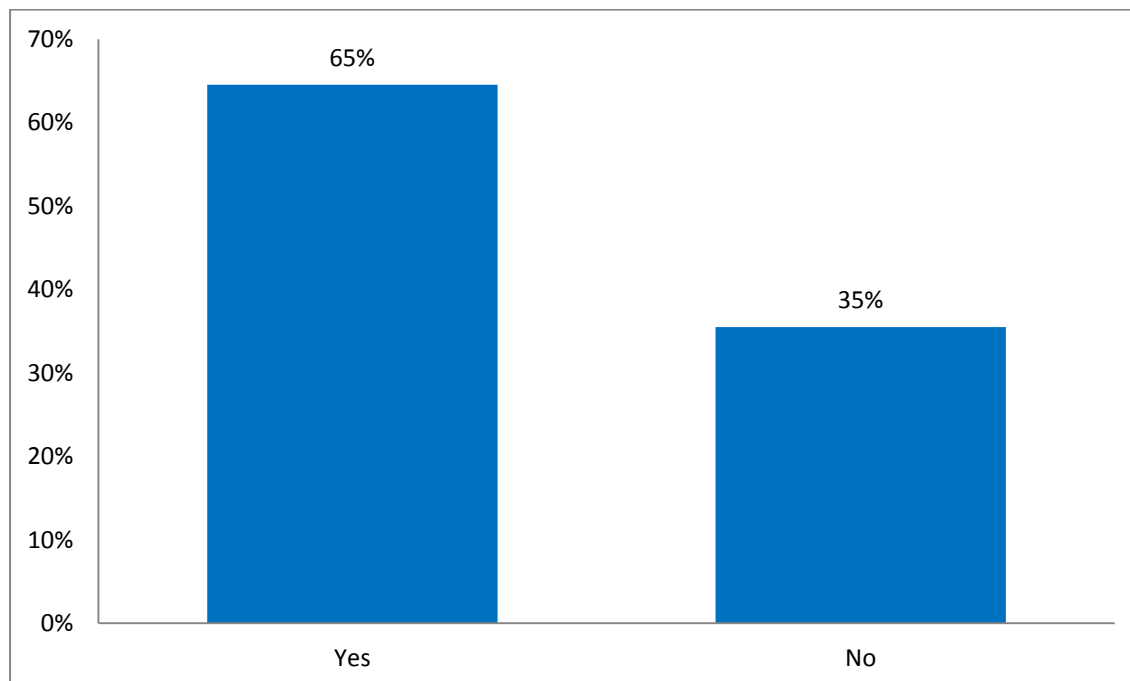
I strongly feel the down-banding is a good thing. It's important to make best use initially of the properties already available - i.e to allow homeless/near-homeless people a higher band as is now being done.

**Response:**

The Council is pleased that the majority of the respondents will not be affected by the under-occupying down-banding proposals.

The Council acknowledges THT's concerns and all applicants will be assessed based on their individual circumstances. Any resident who encounters a change in circumstances resulting in under-occupying can present to HOST for housing advice and assistance and may look to be rehoused.

### Question 8: Do you agree that those people under-occupying by two or more bedrooms should be reduced from Band 1 to Band 2?



65% agreed that those people under-occupying by 2 or more bedrooms should be reduced from Band 1 to Band 2.

Comments made in relation to this question are detailed below:

If these applicants a willing to move then every opportunity should be given to free this home for a family. This need to work alongside your homeless strategy and you should be assisting these applicants just as much as you would assist a homeless person. They kind of work hand in hand. You find a smaller home for them and you move a homeless family in. I know things are not black and white but every effort and opportunity should be given to these groups.
How will these properties be released to those that need them of the people needed to downsize have less priority?
Work more on the internal swapping. Offering homes to suit needs. Too many fussy on swapping homes.
People should be housed to their need
Same reason as the last question - these should be dealt with on a case by case basis weighing up the benefits to the person and other applicants in need. I believe we should be offering incentives to release under occupied properties to make better use of the properties available to rent.

Single person occupancy in a two bed property shouldn't be penalised though as there aren't many 1 bedroom properties.

Due to the reasons outlined in Question 7 i.e. customers circumstances change, and they may no longer be able to afford their home. We believe that people under-occupying by two or more bedrooms should remain in Band 1 to prevent homelessness.

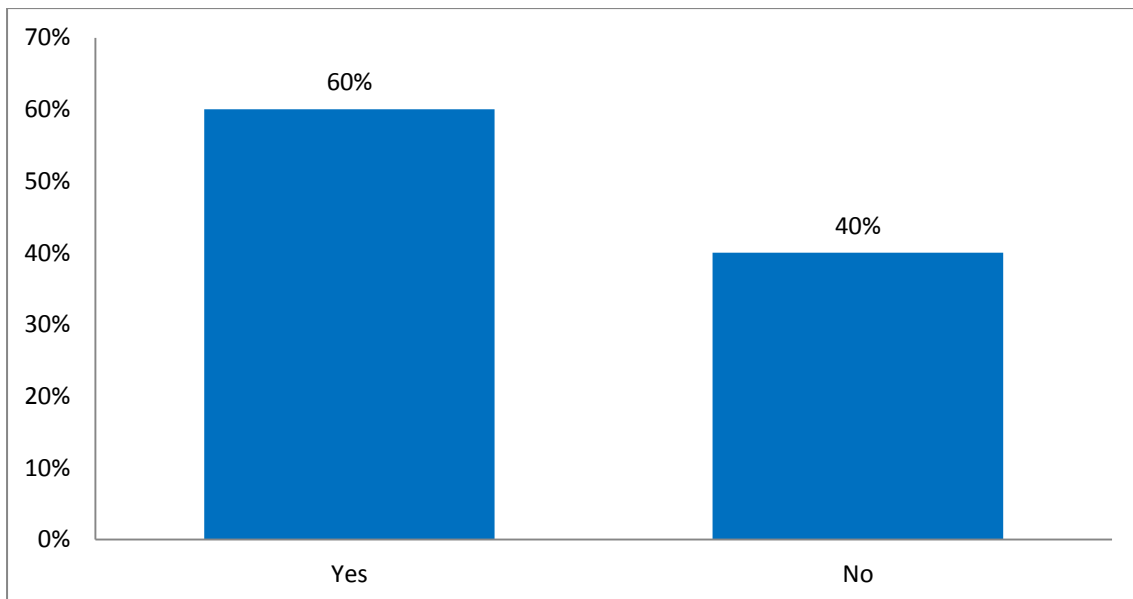
See comments at 2 and 7.

**Response:**

The Council welcomes the respondents' views in terms of those under-occupying by two or more bedrooms being down-banded from Band 1 to Band 2. The reason for this proposal is that those applicants affected by the under-occupancy charge which was introduced in 2013, will now have had the opportunity through the previous Allocations Policy to downsize to a more suitable property. It was felt that those applicants in Band 1 should be those in the more urgent need such as statutory homeless applicants rather than those that are currently housed but may not be living in unsuitable accommodation.

Any resident who encounters a change in circumstances resulting in under-occupying can present to HOST for housing advice and assistance and may look to be rehoused.

**Question 9: Do you agree that those people under-occupying by one bedroom should be reduced from Band 2 to Band 3?**





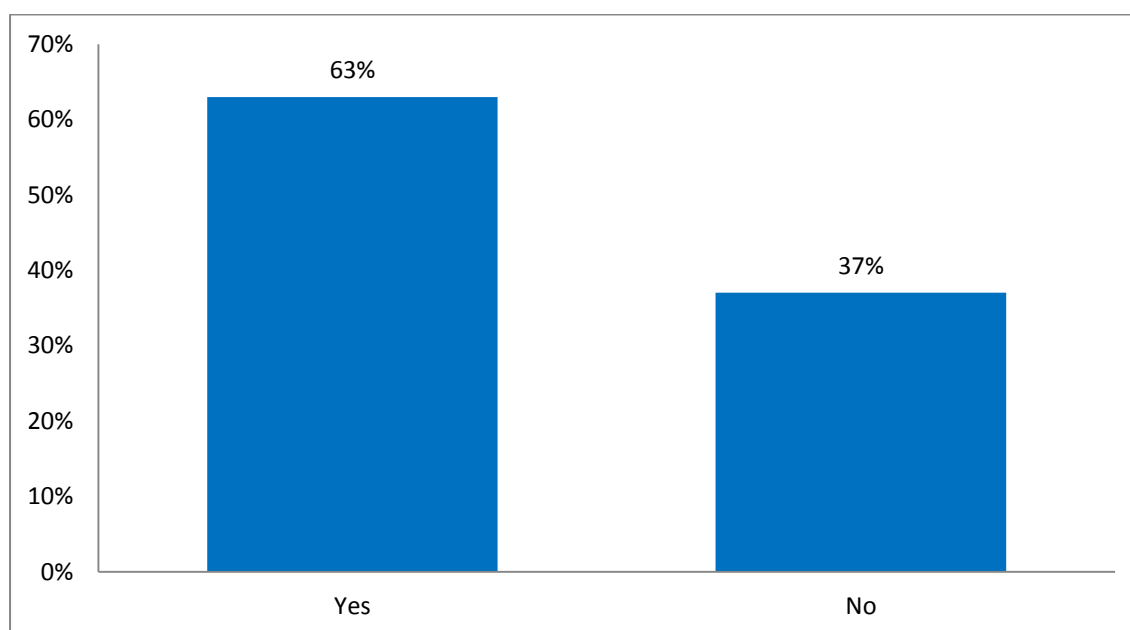
60% of the respondents agreed that those people under-occupying by 1 bedroom should be reduced from Band 2 to Band 3. Comments made in relation to this question are detailed below:

No pointless.
As previous internal swapping needs working on.
People should be housed to their need.
Same as above.
See my previous response.
For the reasons outlined above in the answers to question 7 & 8.
See comments at 2 and 7.

**Response:**

The Council welcomes the respondents' views in terms of those under-occupying by one bedroom being down banded from Band 2 to Band 3 and that the majority of the respondents agreed with the proposal.

**Question 10: Do you think the household savings and earnings amounts are correct?**



63% of the respondents agreed that the household savings and earnings amounts were correct.

I'm not sure if it is correct as I don't know what you are measuring against but appears to be reasonable.
I'm not sure
I don't really know much about this to be honest but earnings you can earn whatever you like u less you have a deposit of 10% to buy a property then this is equivalent to what you earn sometimes social housing is someone's only. Option even private renting some 3 beds want over a £1000 a month unless these are looked at house prices and private renting then social housing list is only. Going to get bigger.
Nothing explaining or referring to this in the draft, what is the point of asking questions without making available the information you are referring to in the consultation documents?
I don't understand this question.
There is a question on registration regarding income and savings – any exceptions will need to be looked at by the exceptional circumstances panel. The upper earning level has been increased to £60,000, which is in alignment with most RP's & the savings figure has remained the same at £16,000.
Savings should probably be more as the expenses of taking a tenancy on the private market, if one had to pay 6 months rent in advance, (which one would in my fairly wide experience if on Housing Benefit,) would not leave a great deal over. I am single: for families expenses would be higher. One needs to have something to cover some of the bills, especially heating, which one is unable to cover or to consistently cover on a low income. However in terms of earnings, it seems these properties, which are desperately needed by people who cannot access privately rented accommodation, are being offered to households with large salaries who could very well rent privately. I completely fail to understand this and I think it is very wrong. People on Benefits, unless with enough savings to pay 6 months rent in advance, can generally not access privately rented properties as landlords do not want tenants on Benefit, and in this area especially most rent through Agents, who will not consider people on Benefits. (Note recent campaign by Shelter, but long overdue and my experience is that the situation is worse than they are saying.) Insurance companies often will not insure properties for letting to people on Benefits or sometimes only at worse terms. (I discovered this in 2003 during a short time as a joint landlord of a property.) This discourages landlords from letting to people in this situation. When renting my current flat originally in 2011 (privately rented) I was able to pay 6 months in advance and on Housing Benefit it was still very difficult to find Agents willing to accept me. I have an excellent record. Also people on Benefits may well be unable to afford the deposit plus letting Agents' fees. I do not feel employed people should be on this list unless on very low incomes, e.g. part-time with low pay. Generally they do not need to be. Surely this type of housing provision was set up for people who otherwise would be struggling to get anywhere to live or find it impossible. If not I don't understand the point of it.

**Response:**

The Council welcomes respondents' reviews with regards to the household income and savings amounts. The Policy states that the following amounts are considered and if these thresholds are met that the applicant would be placed into Band 5:

- Households earning an income of £60,000.
- Households having capital assets or equity of 40%.
- Households having savings of £16,000.

**Question 11: What are your overall thoughts on the revised Allocations Policy?**

Well thought out Policy
Ok
Anything that helps reduce homelessness is a positive and should take priority. It is unacceptable to see people sleeping on benches and in doorways
The policy is written well but in some areas further explanation is required such as relief duty. I don't know what this is or prevention. It means nothing to me when I'm reading it but because you understand the terminology doesn't mean we do.
I think it's great but I'd like to see if it will change under this new policy I should be band 1 but I'm sure host won't move me as they have tried their hardest to do everything wrong and against the Trafford policies in place
Not sure most of it will help
I still think it's needing more research time work done on it. There has to be a better way of helping people by the Allocations system making it fairer for all. The Sick Disabled Children Families. People whom leave properties from one borough to another with arrears damage to homes by tenants why would they be given a priority there's got to be a scoring system based on more
I agree
Will not free properties up any quicker for people in REAL need.
Fair
Brilliant
Needed changing. Sending too many homeless on the streets with little support.
It's not going to change anything at all just someone thinking they can put input into a crisis realistically is this going to change anything anytime soon?
A welcomed change to the policy in line with change in legislation



Very jargon and feels like knee-jerk response to the housing crisis and not very joined up.

Still room for improvement.

It needs refining. Not fit for purpose at present.

The revised policy is very HRA focused which is to be expected, however we recommend that it needs to offer more customer choice and flexibility for individual circumstances.

Under section 2 - The Policy aims to ensure that no group or individual is discriminated against as a result of this policy, and to promote equal opportunities. However, the Policy is silent on mental ill health, the focus is on physical adaptations, providing aids and adaptations to current accommodation, and there is no consideration of individuals with poor mental health, or the property impacting upon a person's mental health needs. There is a growing recognition of people suffering from poor mental health whereby the property is impacting upon the individual's quality of life.

There is some attempt to give more help to people homeless or in danger of homelessness, reflected in changes of priority, which I think is good. The reduction in percentage of properties restricted for employed people is good, but I don't think there should be any such properties. The entire rental market restricts most properties for employed people only, but everyone needs somewhere to live even if not employed (and having nowhere to live greatly reduces any chances of future employment). Favouring employed people in this way can only create homelessness and perpetuate poverty. I am personally affected by over 55 rules. I don't think over 55s should be exempt from financial considerations, for same reasons as above (see 10), or from local connection rules. Others have to wait to become eligible and I don't feel this is fair. Personally I am confused as nothing has been said about the properties 'reserved for older people' - which are far more numerous than sheltered properties. So what is the situation here? I have a real problem as I have a medical need for a bath, not a shower (in fact it's better for me medically in 3 ways but one is particularly important) - yet sheltered properties generally have showers and many are being adapted in this way. I do bid on sheltered properties if I don't know they only have a shower, but also on properties reserved for older people. Properties available for other ages are generally too oversubscribed for me to feel they are worth bidding on. (I assume this is 'general needs' but currently the automated system allows bidding. I may never have done this but I did not realise it was not allowed in the policy.) I would like sheltered accommodation if it was possible but another concern is whether Housing Benefit would pay the higher rents. I have only been able to get limited information on this by telephoning them and now the Local Housing Allowance seems to be being introduced for social housing tenants. I have not been able to find out whether this affects sheltered flats. I am afraid now I shall get downbanded to 5 as I need to bid on non-sheltered accommodation for these reasons and I already feel discriminated against over the bathroom issue. It seems to be implied that unless I bid only on sheltered accommodation (most of which only has showers and so is unsuitable) I am barred from bidding on any sheltered accommodation, and will be disadvantaged by the lower banding. I find



it all very confusing and don't understand the situation. I also need to be on the ground floor or with a lift due to a back problem which compounds the difficulty. Also sheltered accommodation is often situated in places where accessing transport if one is still able to get around, is difficult. (For some places the transport situation has radically changed in the last few years.) Up to 66 for Benefit purposes one is still required to be available for work unless one has specific very significant health difficulties, which currently I do have. However I do not wish to antagonise DWP by worsening any future chances of possible work. Others must be in a similar situation. I feel that people are human beings with individual needs and some account ought to be taken of this, so I am against the rule of one offer only.

### Response:

The Council thanks all those that responded to the consultation and is pleased that overall respondents felt that the Policy was well written and takes into account the changes enacted by the Homelessness Reduction Act.

The Policy in some places does use jargon however there is a glossary of terms to provide clarification.

An applicant with a medical condition including mental health will be assessed and priority would be determined based on the individual's circumstances.

The age that an applicant can apply for sheltered housing has been lowered to 55 from 60 to allow more access into the accommodation. An applicant can apply for a general needs property (this means a property that would meet the general needs of any applicant rather than a specialised need such as sheltered or an adapted property).



## Question 12: Are there any other changes you think we need to make to the Policy?

Only as mentioned earlier.
I think HOST staff need to be regulated by more policies.
Yes there's many changes we feel like others need to be done <ul style="list-style-type: none"> <li>- Those at the greatest risk should surely based on facts be given priority</li> <li>- Class the risks based on age from child you.</li> <li>- There's too many children on the streets nowhere to live.</li> <li>- It's not about age colour race.</li> <li>- It's making it work for everyone in a structure we can all understand.</li> <li>- Disabled people need more help</li> <li>- More groundwork please</li> </ul>
Review people who have been on the housing list longer than others.
I don't know enough to answer this.
Don't turn away the homeless. Everyone should be a priority. Don't wait till they're on streets with mental health problems and addictions to help them!
Yes should get rid of the bidding system and do it based on need as apart from Band 1 all other bands you are never going to get anywhere housing should be given to need homeless pending homeless and need for instance someone can no longer walk upstairs medically and needs let's say a bungalow .
Start again!
Yes work with charities because the local councillors don't seem to understand the problems.
The policy doesn't detail membership of the Exceptional Circumstances Panel and we recommend that a representative from the Housing Providers sits on the panel.
Regarding owner occupiers, unless they have now lost the financial advantage of the property, for instance they are in process of being repossessed; if they have the resources to secure their own accommodation privately I cannot see why they are included. The situation is similar to people on large salaries as above or any reasonable salary. The accommodation should be for people who need it and cannot meet their need without it. (I see that there may be a temporary need in emergencies, for instance domestic violence situations, but if someone has their own accessible resources this should be very temporary.) I do not think 16 to 18 year olds should be required to supply a guarantor as this will be difficult for those in vulnerable and deprived circumstances. Present policies nationally are going to force many onto the streets or to remain in abusive situations. Depriving this age group of the ability to live separately was tried under the Thatcher Govt and was very quickly found not to work. They may need a different type of accommodation with more support (as with older people), but I don't think forcing them onto the streets is the answer. As stated, (I am over 55,) I do not think it's fair that local connections and financial position are not considered for over 55s. They may be in a very good financial position, taking advantage of the system and occupying flats needed by others who do not have a choice. My research in the past suggested that other Local Authorities apply local connection rules to this age group. I have tried to find other areas to apply where I have had a past local connection but have found I do not meet their criteria in this regard (since it varies from place to place).



Regarding restricting 20% of properties to employed people, as stated above (see 10, 11,) I feel any such restriction is wrong, as most employed people can access the private rental market, which in general unemployed people cannot do. However if there is going to be Band 4 preference, what about other criteria in Band 4 such as voluntary work? Discriminating in favour of employed people assumes unemployed people have capital to pay Agents and pay deposits, but in fact one can only get Benefits if one's capital is very minimal especially certain Benefits such as JSA. Most landlords in this area seem to rent through Agents and even if renting directly a deposit will still be required. For many on Benefits this is not a viable option. I find it unclear in the policy what happens if someone refuses an offer: in some places it says their application is cancelled (so they cannot bid), but in others that they are down-banded to 5 (when presumably they could still bid). These outcomes seem to be used synonymously but they are different. Possibly this relates to differences in circumstances but I have not been able to understand what is being said here. The policy is unclear as regards over 55s as no mention is made of properties currently reserved for this age group but not sheltered, which to date have been much more numerous than sheltered properties. It is therefore unclear where one stands if over 55 in relation to bidding on these properties, and whether or not these properties will continue to be reserved for this age group. There seems to be no definition supplied as to what constitutes 'general needs' properties. I think it might be better if Trafford Council retained an ultimate authority over the actual provision of the accommodation rather than abdicating this and leaving it to the individual Providers. The Providers do not seem to consider the actual situation of many of the clients, in a number of ways, when the clients have very little in terms of finances. It is very unfair when one has to wait years to get accommodation but when something does come up, one is expected to be in a constant state of readiness to move immediately. As life has to go on, in a fairly normal situation it is not really feasible to maintain this state all the time over a period of years. It also means that one has to pay two lots of rent over the period of notice required by one's current landlord. Present notice periods are longer than in the past, generally one month from date of moving in originally, which can easily be nearly 2 months. Expectations of Housing Benefit and Providers as regards moving do not match up. Providers' demands do not allow any leeway on dates of giving notice to avoid such a long double payment period. Housing Benefit requires a physical move in order to receive money on the new property. While Housing Benefit has discretion to cover both properties, I am told the willingness to do so varies considerably in different areas. Although in the private sector it is normal to find flats supplied with 'fridge', cooker and carpets, it is becoming increasingly common in social accommodation for clients to be expected to provide these, presumably to save the landlord the maintenance costs - which the tenant cannot afford. This causes all sorts of practical difficulties for tenants coming from privately rented flats - or returning later to renting privately. In the latter case one has to get rid of items one was forced to acquire earlier. Everything has to be done very quickly and for elderly, pregnant or unwell people and those helping them it causes worse problems. It causes difficulties in other situations e.g. where a relationship breaks down and one partner leaves the home with nothing (but sometimes with one or more children). It leads to situations where people are left without cooking facilities, or even sometimes the ability to make a hot drink, and where families can



end up sheltering in empty rooms only marginally better off than they would have been on the streets and again with no way of making a hot meal. Clients are also required to remove perfectly good carpets at the end of the tenancy which cannot be taken elsewhere, depriving the next tenant of the carpet and causing major problems especially for relatives of someone who has died - it would be better to charge the tenant or those acting on the tenant's behalf, for getting them cleaned if this is the concern. Again there is an assumption that the client has capital. One is looking at people in difficult situations, so there is a need to supply adequate facilities for basic living - as is done with privately rented flats, and not as one Provider said to me, to 'supply housing - four walls and a roof.'

### Response Summary:

The Council thanks all those that responded to the consultation. The new Allocations Policy 2018 proposed the following changes:

1. Applicants who have been assessed as statutory homelessness are moved from Band 2 to Band 1.
2. Homelessness applicants who are owed the 56 day Relief Duty in accordance with The Homelessness Reduction Act 2017 are placed into Band 2.
3. Homelessness applicants who are owed the 56 day Prevention Duty, in accordance with The Homelessness Reduction Act 2017, are placed into Band 3. Applicants will be moved to Band 2 after 28 days provided they have complied with all aspects of the Personal Housing Plan.
4. Exceptional Circumstances Award is being limited to 12 months, currently there is no limit to this award. This new rule will stop people sitting on their award waiting for the 'perfect' property to be advertised. Should a person be awarded exceptional need to move the Council would assume that this need is urgent and therefore would have taken place within 12 months.
5. One offer only rule across all Bands - applications will be cancelled upon refusal of a suitable offer of accommodation, unless there is a valid reason, which will be addressed at a review/appeal process. Currently applicants are able to refuse offers and continue to wait on the register for an indefinite time. This new rule will stop people sitting on the Housing Register waiting until the 'perfect' property to be advertised. It will save officer time at HOST and within the RPs who make an offer which is then withdrawn/ refused by the applicant.



6. Tenants of Registered Providers under occupying by 2 or more bedrooms will be reduced from Band 1 to Band 2 and tenants of Registered Providers under occupying by 1 bedroom will be reduced from Band 2 to Band 3. These categories were introduced to assist with government changes in Housing Benefit awards when tenants were under occupying. The Council believes that tenants who needed to move will have done so. Any tenants who find themselves in this situation will be awarded the Prevention Duty and receive help via the HRA. This change will allow those remaining in Band 1 more available properties and thus facilitating speedier move on from supported accommodation as well as less time in temporary accommodation for those owed a main homelessness duty.

Following a review of all the comments received, it is proposed to amend the 'one offer rule' to a 'three' offer rule. It is proposed that a limit of three refusals will be allowed before the applicant is removed or suspended from the Housing Register. Applicants will be cancelled upon refusal of a suitable offer of accommodation, unless there is a valid reason, which will be addressed at a review/appeal process. Currently applicants are able to refuse offers and continue to wait on the register for an indefinite time. This refusal limit will stop people sitting on the Housing Register waiting until the 'perfect' property to be advertised. It will also save officer time at HOST and within the RPs who make an offer which is then withdrawn/refused by the applicant.

The other proposed amendments will be taken forwarded within the final version of the Housing Allocations Policy 2018.