

Consultation Report	 TOWER HAMLETS
Date: 5th March 2020	Classification: [Internal Use Only]
Proposed changes to the Common Housing Register Partnership's Allocations Scheme	

Originating Officer(s)	Una Bedford (Strategy and Policy Officer – Place)
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1. Background

- 1.1** This report sets out key findings following a period of consultation and engagement with residents and other key stakeholders on proposed changes to the Common Housing Register Allocations Scheme.
- 1.2** The consultation exercise began on 21st October 2019 and ran for just over 17 weeks until 10th February 2020. The consultation aimed to canvass the views of a wide range of community groups and stakeholders with an interest in the Borough's Allocation Scheme.
- 1.3** This report sets out:
- How residents and organisations were invited to respond to the consultation; and
 - The level of satisfaction with each policy proposal, a summary of the main issues raised by respondents and how the Council has taken them into account

2. Overview of the Consultation

- 2.1** The Council has been consulting with stakeholders on proposals within this report intended to revise and amend the current Common Housing Register Partnership's Allocations Scheme. The Allocations Scheme is an existing policy which covers eligibility for, and the letting of social housing (Council and Housing Association housing)
- 2.2** The Council have consulted with key stakeholders on the proposed changes to the Allocations Scheme. This consultation was open to anyone who lives, rents or owns a home in the Borough, any professional working for an organisation with an interest in the future of housing in Tower Hamlets and to members and staff working for the Council. It also included all the Registered Provider partners signed up to the Tower Hamlets Common Housing register.
- 2.3** The consultation exercise consisted of an online survey to understand the view of stakeholders on the amendments proposed to the Allocations Scheme. All applicants currently on the Common Housing Register were sent a letter which signposted them to a dedicated consultation website or to an event, with a booklet available online and in person detailing the proposed changes to the Allocations Scheme. There were also several events either drop in or focus group sessions to highlight the proposed changes to the Allocations Scheme. Feedback from those events have been

captured by adding the paper surveys completed on-line and findings in this report for each of the proposed changes which reflects the comments received from residents. The responses have been considered carefully by senior officers and members and consequently used to inform whether these proposals are adopted to this revision of the Allocations Scheme.

2.4 This report focuses on the responses given by those who completed the online survey. The views and opinions expressed in this report are those of the residents and stakeholders responding to our consultation and do not necessarily represent the views, priorities and policies of the Council.

3. Proposal 1 – Homelessness

3.1 People who are homeless, or who are at risk of becoming homeless, are sometimes able to secure private housing outside Tower Hamlets to resolve their homelessness. This is necessary to make best use of all suitable available housing across London.

3.2 Currently, a person rehoused outside the borough would be removed from the housing register because they would no longer meet the need to have lived in Tower Hamlets for three years before being eligible for a property.

3.3 Applicants who are homeless and owed a duty are prioritised for housing and that will apply to applicants owed a prevention and relief duty under the new homeless legislation.

3.4 In addition, this proposal would change the rules so that if someone was able to secure suitable and affordable housing outside the borough because they had either become homeless or were at risk of becoming homeless, and homelessness was prevented with assistance from the council, they would not be penalised by being taken off the register.

3.5 Then, instead, they would be allowed to remain on or join the register for three years only, if not rehoused will be taken of the housing register. This would provide the time for them either to be offered a suitable property back in Tower Hamlets, or to have lived in their new borough for long enough to be eligible to join the housing register and bid for a property there.

3.6 Also, under consideration was whether applicants rehoused into suitable size private sector accommodation because homelessness was prevented should be given some priority during the three-year period even if they are adequately housed.

Q1:

Homeless applicants or those at risk of homelessness rehoused outside of the borough should remain or be able to join the housing register for a maximum period of three years?

- **Strongly Agree**
- **Agree**
- **Neither agree nor disagree**
- **Disagree**
- **Strongly disagree**

Opinion	Number of respondents	%
Strongly Agree	438	23.13%
Agree	486	25.66%
Neither agree nor disagree	327	17.27%
Disagree	196	10.35%
Strongly disagree	447	23.60%

A total of 1894 of all survey respondents chose to answer this question, while 76 chose not to.

- 49% of respondents either agreed or strongly agreed with the proposal to allow homeless applicants or those at risk of homelessness rehoused outside of the borough to remain or be able to join the housing register for a maximum period of three years.
- 17% of respondents neither agreed nor disagreed with this proposal.
- 34% of respondents either strongly disagreed or disagreed with this proposal.

3.7 Comments from respondents

“It is not always right to make someone leave the housing list if they have been placed out of Tower Hamlets against their own will. This is a fair chance for them to remain on the list. Though, it is unlikely for them to be housed within 3 years, so again, this provides a sense of false hope”.

“Homeless applicants are already in a very vulnerable state. Allowing them to stay on housing register for 3 years may not be enough time for them to achieve secure tenancy. Therefore, this period should be extended to give them a realistic chance of obtaining secure tenancy”.

“I believe the council that is currently housing them should be the first council to offer them accommodation”.

“I feel that if you are genuinely homeless than relocating anywhere is a better prospect than living on the streets. Hence this proposal is valid”.

“It is pointless them staying on the register for three years. As they are most likely not going to be allocated anything within that time”

“How about also doing a list cleansing exercise on current list, do a mass mail out if anyone does not respond suspend their application until you hear from them. Chances are you won’t because lot of people have left the borough”.

3.8 Findings

3.8.1 It is evident from the comments provided by respondents that the majority, (49%), agree that homeless applicants, or those at risk of homelessness who are placed out of the Borough into settled accommodation, should be given the option to return to the Borough; by allowing them to remain on the Common Housing Register for up to three years after they have been placed in out of borough accommodation.

3.8.2 However, several respondents commented that by allowing these applicants to remain on the CHR, the Council were only offering false hope which would never be met.

4. Proposal 2 – Freeing up larger homes

- 4.1 Under the current rules, if a council or housing association tenant is living in a home on the first floor or above, they are not given priority for a move to a ground floor home unless there are health reasons for doing so.
- 4.2 This proposal will give preference to social housing tenants living in homes, on the first floor or above, with more bedrooms than they need. Changing this policy will make larger-sized homes available to families that need the additional space, while helping those tenants currently affected by the ‘bedroom tax’ who want to downsize.

Q2:

To what extent do you agree with this statement? Council or housing association tenants giving up larger homes should be considered for ground floor homes to free up much need family sized properties

- Strongly Agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Opinion	Number of respondents	%
Strongly Agree	522	27.52%
Agree	658	34.69%
Neither agree nor disagree	345	18.19%
Disagree	140	7.38%
Strongly disagree	232	12.23%

1897 respondents chose to answer this question, while 73 respondents chose not to.

- 62% of respondents either strongly agreed or agreed with the proposal that social housing tenants who give up larger family sized homes should be considered for ground floor homes.
- 19% of respondents neither agreed nor disagreed with the proposal
- 20% either strongly disagreed or disagreed with this proposal.

4.3 Comments

“I think that people that have more bedrooms than they need should be encouraged, (maybe rewarded), to move as we are so 'overcrowded' and some families really need those homes more than they do, when they use their bedrooms 'for storage' is really frustrating when me and my daughter are sharing a room”.

“I believe it depends on the health conditions and if someone has small children's or with disability”.

“This should help free up large homes”.

“A home is more than a building, some people have lived in their homes for decades, if not multiple decades, and as such this needs to be taken into consideration. Yes, freeing up space is important but for some this could cause other issues, particularly for those with mental health issues.”

“People who are on social housing shouldn't be under-occupying anyway regardless of whether they are on first floor or ground floor. The bedroom tax doesn't make a difference. I think if you are under-occupying you should be given another property”,

“I think there are too many big homes occupied by less people leaving us with big families in over- crowded homes which affects our children's sleep and education”.

4.4 Findings

4.41 While the majority of survey respondents (62%) agreed with the proposal to consider giving preference to Council or housing association tenants who give up a larger home in return for ground floor homes to free up much need family sized properties, there is concern for the distress and displacement that this may have on residents who have lived in their family home for many years.

4.42 This would be a voluntary choice on the part of tenants who wish to down-size and this would need to be communicated to tenants.

4.43 Consideration should be made by partners, if they don't already, to provide some form of financial incentive to boost a down-sizing initiative – potentially offering a fixed allowance per bedroom which the tenant is relinquishing with a possibility of assistance through a one-off payment towards removal costs and/or a decoration/ minor repairs.

5. Proposal 3 – Ground floor flats offered to applicants who cannot manage internal stairs

5.1 A limited number of ground floor flats become available each year. Under the current rules, lettings officers must make their allocation decision based only on whether an applicant has higher or lower priority in their band when they match on the shortlist. This proposal would allow officers to also consider medical factors like whether an applicant can manage internal stairs and give preference accordingly.

5.2 Changing this policy could mean faster rehousing times for those applicants who cannot manage internal stairs.

<p>Q3: To what extent do you agree with this statement? Applicants who can't manage internal stairs should be given preference for ground floor flats.</p> <ul style="list-style-type: none"> • Strongly Agree • Agree • Neutral • Disagree
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Opinion	Number of respondents	%
Strongly Agree	706	37.14%
Agree	775	40.77%
Neutral	198	10.42%
Disagree	58	3.05%

1901 respondents answered this question, while 69 respondents chose to skip this question

- Almost 78% of respondents who commented either strongly agreed or agreed with the proposal to give applicants who cannot manage internal stairs preference for ground floor flats.
- Just over 10% of those who answered the question held no opinion either way on this proposal.
- Only 3% of respondents disagreed with the proposal.

5.3 Comments

“I agree applicants with medical and mobility conditions should be considered for ground floor housing”.

“Normal people won’t understand these struggles. But they know how hard it is. And in the case where a ground floor flat cannot be available then adjustments will need to be made to the house/flat they are currently living in. And TH will need to help fund this. That would mean more funding needed for mental and physical health organisations not less. Because they are on the rise and are very common. So major funding increase is needed not cuts. But that is another subject for another discussion”.

“I think this is unfair. Just as much as disabled people struggle with stairs, so do single mothers with pushchairs, children and shopping. Everyone should get equal options”.

5.4 Findings

5.4.1 Almost 78% of respondents agreed with the Council’s proposals to give preference to applicants who cannot manage internal stairs for ground floors flats. Several respondents commented that this would be unfair to parents who have to negotiate stairs with children, pushchairs, and shopping.

5.4.2 Most applicants understood that the intention behind this proposal is to free social housing stock up, particularly those larger sized family homes which no longer meet the housing needs of the tenant or where the tenant may now be under-occupying the property. Having the ability to offer applicants who have a need for more suitable ground-floor based properties could incentivise those on the CHR to downsize – freeing up family-sized accommodation and allowing the Council and its CHR Partners to make the best use of the social housing stock as well as meet the medical needs of those applicants.

6. Proposal 4 – Victims of domestic abuse

6.1 Under the current rules, victims of domestic abuse who have not lived in Tower Hamlets for the previous three years are placed on the housing register in band 2B. Many of them have needed to move to a new area for their own safety, so this proposal will waive the residential criteria meaning they could be placed in band 2A instead. This proposal could lead to faster rehousing times for victims of domestic abuse.

6.2 This proposal would also reduce the amount of time that domestic abuse victims who have found safety in refuges need to have been in the borough before being eligible for housing. Under the current rules, they need to be in the refuge for six months. This proposal would cut that to three. This would free up much-needed places in refuges to help other victims of domestic abuse.

Q4:
To what extent do you agree with this statement? The residential criteria should be relaxed for victims of domestic abuse as outlined under this proposal.

- **Strongly agree**
- **Agree**
- **Neutral**
- **Disagree**
- **Strongly disagree**

Opinion	Number of respondents	%
Strongly Agree	391	20.69%
Agree	675	35.71%
Neutral	437	23.12%
Disagree	167	8.84%
Strongly disagree	220	11.64%

1890 respondents chose to answer this question while 80 respondents chose not to.

- Just over 56% of respondents agreed with the proposal to relax the residency criteria for victims of domestic abuse.
- 23% held no opinion
- Over 20% of respondents either strongly disagreed or disagreed with this proposal

6.3 Comments

“It should be proven that the individual is a domestic abuse victim as this new regulation may encourage false accusations just to improve chances of rehousing”

“There are some people who use this as a means to secure a property through social housing. It’s unfair when they take their spouse back into the home. Will something be done to have the abuser away from the property? There should be a penalty for the couple reuniting in the home which has been offered due to safety concerns”.

“I do agree that criteria should be relaxed for domestic abuse victims. I’m sure that TH is thorough in its research into viable abuse victims, however comprehensive evidence of abuse should be found and not just here say- with no proof, to get rehoused quicker. As this puts other people in real need at a disadvantage”.

“Absolutely! I know for a fact they’re suffering in silence and staying put in the place of abuse, due to not having anywhere to go and live. This will definitely give them that step closer to a safer life and a life of freedom and abuse free”.

“Safety is paramount but again circumstances to be reviewed how far are they from domestic abuse family friends associates etc”.

6.4 Findings

6.4.1 Only 20% of respondents either disagreed or strongly disagreed with the proposal to relax the residency criteria for victims of domestic abuse. 56% of those who responded agreed or strongly agreed with this proposal.

7 Proposal 5 – The future of Band 3

7.1 Band 3 contains 40% of all households on the housing register. We estimate that 35 per cent of housing officers’ time is spent administering the Band 3 list. The majority of applicants in this band have little or no prospect of ever receiving an offer of accommodation unless they qualify for sheltered or older persons’ housing.

7.2 This proposal would make the housing register more realistic and remove the risk of many of those in Band 3 being given false hope. It would achieve this by removing existing Band 3 applicants who are already adequately accommodated. In future, only the following applicants would be accepted onto band 3:

- Single applicants or couples over 50 years of age would be accepted and only considered for older person homes that become available – a type of property traditionally in low demand.
- Any applicant requiring sheltered accommodation – another type of property traditionally in low demand.

7.3 Applicants removed from Band 3 of the housing register as a result of this proposal would have to explore other housing options including:

- Securing suitable private sector accommodation – whether through renting, shared ownership, intermediate housing or buying a home
- Council and housing association tenants could consider a mutual exchange (a direct like for like swap with another tenant).
- Housing Moves* – a pan London scheme for council and housing association tenants allowing for cross-borough moves.
- Homefinder* – a similar scheme that is nationwide, not just London based. This scheme is also available for people in temporary accommodation.

**Housing Moves and Homefinder are likely to consider applications on a similar basis to those considered here in Tower Hamlets. If an applicant’s priority was assessed as low here, it is likely that would also be the case elsewhere.*

Q5:

To what extent do you agree with this statement? Applicants not in housing need who are already adequately housed (other than those over 50 years of age or requiring sheltered accommodation) should be removed from band 3 of the housing register.

- **Strongly agree**
- **Agree**
- **Neutral**
- **Disagree**
- **Agree**

1932 respondents answered this question while 38 skipped this question

Opinion	Number of respondents	%
Strongly Agree	193	9.99%
Agree	218	11.28%
Neutral	197	10.20%
Disagree	222	11.49%
Strongly disagree	1102	57.04%

- Almost 69% of residents strongly disagreed or disagreed with this proposal.
- 21% of those who chose to respond to this question either strongly agreed or agreed with this proposal, only 10% held no opinion either in favour or against.

7.4 Comments

“If time is being wasting through administration of applicants in band 3 that do not need housing, they should definitely be off as this valuable time could be used for people that are in need of housing”.

“Tower Hamlets is a very expensive area to rent house. So those who will be removed from band 3 application, will council allow them to re-apply if their circumstance change even if they live in other council or city rather than Tower Hamlets by renting cheaper house? Tower Hamlets Council should consider this”.

“Applicants who are adequately housed by private renting doesn’t mean that they don’t need permanent house/flat. Everybody has a right to demand council house. This people can’t float here and there forever”.

“I don’t think it’s fair to just remove current people on band 3, when our application has already been approved. If anything, the new proposal could be applied to new applicants. To just take people of band 3 when they’ve been waiting for a long time and not help them, is just unfair”.

“I think it’s appalling that that is even an option. Not everyone would like to remain living with parents until they are 50 years old. Some people work extremely hard in and for the borough like me but cannot afford the cost of buying or shared ownership yet. To think I have been bidding religiously for nearly 7years to be told there’s a possibility I will be removed of the housing because I’m adequately housed is disgusting. It is extremely unfair to people like me who are not yet in the financial position to buy a property and renting privately is extremely expensive. I do hope this does NOT happen”.

“There is no point in Band 3 existing if expectations will never be met”.

“Social housing is for people who require help with housing. It’s not for people who are already adequately housed. What’s the need for them to be on the housing register, when they have a house? Doesn’t make sense, that’s not the purpose of social housing.”

“Many people can’t afford housing privately. Those already on the list have been waiting for some time. It is wrong to remove them rather put them on a different band. Future applicants can be considered based on earnings”.

7.6 Findings

- 7.6.1** In the main, respondents strongly disagreed or disagreed with this proposal (69%). This indicates that among respondents there is considerable strength of feeling against the proposal to limit Band 3 of the Housing Register.
- 7.6.2** Many of the comments provided by those who disagreed with the proposal indicate that applicants placed within this Band feel that at some point, they will be offered a social home. Limiting applicants within Band 3 would take away this hope. Realistically, the waiting time for applicants is historically high and from the actual number of social housing lets which have become available over the course of the last three years, relatively few of these lets are given to Band 3 applicants.
- 7.6.3** If this proposal remains in place, the alternative housing options that are available to those considered non-priority need and adequately housed needs to be publicised with residents encouraged to actively participate in seeking alternative solutions to their housing needs.

Appendix 1: Equalities Data from respondents

1. Tenure

The Council received 1,970 responses to the online survey. The largest tenure group of respondents (46%) represented in this survey were applicants currently on the Common Housing Register. (44%) were existing social housing tenants (both council and housing association tenants), 8% of respondents were borough residents neither on the Common Housing Register or resident in social housing. Finally, 2% of respondents did not belong to any of the previously cited groups.

1. Gender

In terms of gender, the highest number of respondents who chose to provide equalities data identified as female (56%), while 38% of respondents identified as male, 6% of respondents preferred not to disclose this information.

2. Disability

17% of respondents disclosed that their day to day activities were limited by a health problem or disability which has lasted or is expected to last at least twelve months, including problems related to age.

3. Ethnicity

The largest ethnic group represented among respondents identified as Asian/Asian British: Bangladeshi (58%), followed by 11% of respondents who identified as White British. A total of 17% of respondents preferred not to disclose this information. Respondents who identified as White Other (3%) were the next prominently represented ethnic group. The representation of all other prescribed ethnic groups ranged between less than 1% and below 3%.

4. Religion or belief

21% of respondents preferred not to say or to self-describe with a religion or belief. A total of 6% of respondents identified as having no religion or belief. The highest represented religion or faith which respondents identified with was Muslim (62%), followed by those respondents who identified as Christian (9%). All other religions or beliefs were identified by less than 2% of respondents.

5. Sexual orientation

6% of respondents identified as heterosexual, 20% of respondents preferred not to say or self-describe while 2% of respondents identified as bisexual. Gay men and women represented a little over 1% of respondent.

