

Housing Allocations Policy Review 2025

Policy and Resources Committee 1/12/2025

POLICY AND RESOURCES COMMITTEE

Housing Allocations Policy Review 2025

(ADCCC)

PART I

1 Summary

- 1.1 The council's Housing Allocations Policy sets out how the council will allocate social/affordable rented accommodation, via the council's Housing Register.
- 1.2 Committee is asked to review and provide comment on the changes recommended to the council's Housing Allocations Policy if required, and adopt this updated Policy.
- 1.3 The updated Policy can be found at Appendix Six.
- 1.4 A detailed comparison document outlining the changes recommended to the Policy and the justification for these recommended changes can be found at Appendix Three.
- 1.5 The full results of the six-week public consultation on the proposed changes can be found in the Appendices.

2 Recommendation

- 2.1 For Committee to review, provide comment if required and agree the recommended changes to the council's Housing Allocations Policy for adoption.

3 Details

- 3.1 Certain changes to the Policy are required, due to updated Government guidance within the sector and legislative reform.
- 3.2 Other changes have been recommended that aim to provide additional clarity to our customers, improve officer efficiency and to adopt best practice for specific cohort/s engaging with the council's Housing Service.
- 3.3 Following agreement from the General Public Services, Community Safety and Infrastructure Committee on 1 July 2025, a six-week public consultation was launched on the proposed changes on 14 July 2025, with a finishing date of 26 August 2025.
- 3.4 This consultation was conducted in collaboration with the council's Communications team and was undertaken via the council's 'Have your say' platform.
- 3.5 The consultation was promoted via the council's website and our social media channels. An additional budget was provided by Housing Services to boost the promotion of the consultation on our social media channels in the first and last week of the consultation.

- 3.6 In addition to this, flyers were created and posted on the council's notice boards in the district and the consultation was advertised on the screens located within the council's Visitors Centre.
- 3.7 In line with our statutory obligations, the consultation was circulated to multiple partners (all registered providers within the district) and the parish councils within the district.
- 3.8 The consultation was also circulated to all members of the council's Antisocial Behaviour Action Group (ASBAG) via email on 11 August 2025. Members of this group include registered providers, NHS partners, support services (Hertfordshire MIND and Change Grow Live) and Hertfordshire Constabulary.
- 3.9 The consultation received 392 visits to the page and 154 responses.
- 3.10 This represents a significant increase in the response rate from previous consultations undertaken by the council's Housing Service. In comparison, the five-week public consultation conducted prior to the adoption of the council's Housing, Homelessness and Rough Sleeping Strategy 2023-28 achieved only 13 responses from the public.
- 3.11 The following changes were not required to be consulted upon; these are as follows –
- 3.11.1 The council's Domestic Abuse Caseworker post is now specifically mentioned within the relevant sections of the Policy. (5.2)
- 3.11.2 The council's Senior Housing Options Officer post that is referenced within the Policy no longer exists and has been replaced by the council's Housing Solutions Manager. Therefore, any reference to this title has been removed and replaced with the new post title.
- 3.11.3 Section 1.5 of the Policy states that the service standards that you can expect from the council's Housing Service can be found on the council's website. These service standards are no longer listed on the website, therefore, the section has been removed.
- 3.11.4 Section 2.2.3 of the Policy (Housing Need) has been updated to adhere with our current procedure regarding the process of the potential award of medical banding. This addition confirms to customers that following any recommendation of medical priority banding by the council's independent medical advisor to be awarded to an application, any decision to award medical priority banding will be taken by the council's Housing Solutions Manager.
- 3.12 Therefore, the consultation focused upon the following changes proposed to the strategy, with the following results achieved (in bold) -
- 3.12.1 The council will retain the local connection criteria for customers supporting family members with significant care or support needs within the district as set out within the current Policy. However, we have introduced a new requirement to this criteria that the customer must be able to demonstrate to the council that the distance they currently travel to provide this care and support is unreasonable, or creates a barrier to delivering effective care or assistance. (2.2.1) **(84.2% of consultees Strongly Agree/Agree to the proposed change)**
- 3.12.2 Within the current Policy the exemptions to the local connection criteria for certain Armed Forces veterans (and family members) and all other cohorts are listed within Section 2.2.1.

The new Policy contains a new Section (2.2.2 – Armed Forces Exemptions) that lists updated exemptions specifically for Armed Forces veterans. These exemptions to the local connection criteria for Armed Forces veterans have been updated in line with Government guidance. **(81.7% of consultees Strongly Agree/Agree to the proposed change)**

3.12.3 The exception for customers aged 60 years or over with a local connection to require no housing need to join the council's Housing Register to bid for sheltered accommodation remains, however, the age limit has been lowered to aged 55 or over. This reflects the fact that most Registered Providers now advertise available sheltered accommodation within the district to those aged 55 or over. (2.2.3) **(63.5% of consultees Strongly Agree/Agree to the proposed change)**

3.12.4 For the council to consider an application to the council's Housing Register from a customer who owns a property but are experiencing financial difficulty, a requirement has been introduced to ensure this customer is engaging with the council's Housing Options team. (2.2.4) **(84.3% of consultees Strongly Agree/Agree to the proposed change)**

3.12.5 Section 3.8 of the Policy (Home Visits) has been amended to confirm to customers that any visit to their property may be conducted as a scheduled visit, at short notice or unannounced. If the customer is unavailable for a scheduled visit if required, any offer of accommodation will be subject to reconsideration. Clarification has been added to ensure that customers are aware that access to all areas of the property must be granted during any home visit conducted. **(76% of consultees Strongly Agree/Agree to the proposed change)**

3.12.6 Certain Armed Forces veterans, who as per legislation must be awarded reasonable preference (4.1), will be awarded a Band C priority on the council's Housing Register. (4.2) **(88% of consultees Strongly Agree/Agree to the proposed change)**

3.12.7 In addition to the customers currently listed within section 4.2 of the Policy who may receive additional priority on the council's Housing Register if certain criteria are filled, a customer who has served in the Armed Forces who has joined the Housing Register as they have a housing need, however, are not currently homeless, will be awarded additional priority.

This priority will be awarded by backdating their band start date by 2 years. **(83% of consultees Strongly Agree/Agree to the proposed change)**

3.12.8 Additional clarification has been added to help customers understand the affordability criteria set by our Registered Providers and a requirement added for customers that evidence of the benefit entitlement required to cover the rent of a property with an extra bedroom is provided to the council before the household is able to bid on a property with an extra bedroom to their requirement. (5.10) **(87.4% of consultees Strongly Agree/Agree to the proposed change)**

3.12.9 If medical priority is granted for ground floor accommodation, the customer who has been granted this priority will only be considered for accommodation of this type (no external or internal stairs) (5.11) **(91.8% of consultees Strongly Agree/Agree to the proposed change)**

3.12.10 Following the introduction of new Government legislation, the council propose that care leavers under the age of 25 will be exempt from any local connection

qualifying criteria. **(65.6% of consultees Strongly Agree/Agree to the proposed change)**

- 3.13 It is important to note that the results of the consultation indicate that the changes that have been proposed to the council's Housing Allocations Policy have been well supported.
- 3.14 As part of the consultation, consultees were provided the opportunity to provide comment on each of the changes proposed to the Policy. These comments have been considered and are available for review within the appendices. The demographics of the consultees are also available within this document.
- 3.15 Following the results from the survey and the consideration of the comments provided, no further changes or additions are required to the proposed changes to the Policy.
- 3.16 Therefore, the only changes to the Policy are those that are detailed within this report and can be found in the comparison document at Appendix Two.

4 Options and Reasons for Recommendations

- 4.1 It is recommended that the Committee agree the updated Housing Allocations Policy.

This will ensure that the council are compliant with updated legislation and Government guidance, able provide additional clarity to our customers, improve Officer efficiency and adopt best practice for specific cohort/s engaging with the council's Housing Service.

5 Policy/Budget Reference and Implications

- 5.1 The recommendations in this report are within the council's agreed policy and budgets.
- 5.2 The recommendations in this report relate to the achievement of the following performance indicators.
 - 5.2.1 HN01 – Maximum number of households living in temporary accommodation on the last day of the quarter.
 - 5.2.2 HN03 – Maximum number of households in temporary accommodation throughout the year.
 - 5.2.3 HN06 – Promote access to the private sector lettings in order to prevent and relieve homelessness.
 - 5.2.4 HN11 – Percentage of households prevented or relieved from homelessness.
- 5.3 The impact of the recommendations on this/these performance indicator(s) is:

The implementation of the council's Housing Allocations Policy and the allocation of the available social housing within the district has a direct impact on the achievement of the above performance indicators. The Policy enables the council to allocate social housing to households most in need, including those who are currently homeless and placed within temporary accommodation by the council. The updated Policy supports the delivery of the council's Corporate Framework by ensuring that our residents have access to good quality housing and our most vulnerable residents are supported.

Financial, Staffing, Environmental, Community Safety, Public Health, Customer Services Centre, Risk Management and Health & Safety Implications

None specific.

6 Legal Implications

- 6.1 The Housing Act 1996 (Part 6), as amended by the Homelessness Act 2002 and Localism Act 2011, requires local authorities to have an allocations policy for determining priorities and for defining the procedure to be followed in allocating housing accommodation.
- 6.2 Local housing authorities ('housing authorities') in England are required under s.169 of the Housing Act 1996 ('the 1996 Act') to have regard to statutory guidance when exercising their functions under Part 6 of the 1996 Act.
- 6.3 Therefore, approval of an updated Housing Allocations Policy will ensure that the council is compliant with relevant legislation and adhere to current Government guidance.
- 6.4 The updated Policy does not introduce any new process for personal data management. All information will continue to be managed in line with UK GDPR and the Data Protection Act 2018

7 Equal Opportunities Implications

- 7.1 An Equality Impact Assessment (EIA) is contained within the appendices for this report. It is not anticipated that the updated Policy will have any negative impact on the groups with protected characteristics, with some positive impacts on some groups listed.

8 Communications and Website Implications

- 8.1 Subject to approval, the update Policy will take effect from 2 December 2025. The Service will update all internal procedures and notify our partners (including registered providers).
- 8.2 Communications support will be required to update the Policy version available on the website following adoption of the updated Policy. Further support will be required from Communications to ensure that once the updated Policy is adopted, this is communicated effectively to customers.
- 8.3 The Policy will be reviewed in three years' time, or sooner, if required by significant legislative changes.

9 Risk and Health & Safety Implications

- 9.1 The council has agreed its risk management strategy which can be found on the website at <http://www.threerivers.gov.uk>. In addition, the risks of the proposals in the report have also been assessed against the council's duties under Health and Safety legislation relating to employees, visitors and persons affected by our operations. The risk management implications of this report are detailed below.
- 9.2 The subject of this report is covered by the Housing Services service plan(s). Any risks resulting from this report will be included in the risk register and, if necessary, managed within this/these plan(s).

Nature of Risk	Consequence	Suggested Control Measures	Response (tolerate, treat, terminate, transfer)	Risk Rating (combination of likelihood and impact)
The council do not adopt an updated Housing Allocations Policy.	The council's Housing Allocations Policy would be out of date therefore, not compliant with current legislation and lack adherence to updated Government guidance.	For council to adopt an updated Housing Allocations Policy	Tolerate	2

9.3 The above risks are scored using the matrix below. The council has determined its aversion to risk and is prepared to tolerate risks where the combination of impact and likelihood scores 6 or less.

Very Likely Likelihood Remote	Low 4	High 8	Very High 12	Very High 16
	Low 3	Medium 6	High 9	Very High 12
	Low 2	Low 4	Medium 6	High 8
	Low 1	Low 2	Low 3	Low 4
	Impact Low -----> Unacceptable			

Impact Score

4 (Catastrophic)
 3 (Critical)
 2 (Significant)
 1 (Marginal)

Likelihood Score

4 (Very Likely (≥80%))
 3 (Likely (21-79%))
 2 (Unlikely (6-20%))
 1 (Remote (≤5%))

9.4 In the officers' opinion none of the new risks above, were they to come about, would seriously prejudice the achievement of the Strategic Plan and are

therefore operational risks. The effectiveness of the management of operational risks is reviewed by the Audit Committee annually.

Report prepared by: Jason Hagland, Strategic Housing Manager

Data Quality

Data sources:

N/A

Data checked by:

N/A

Data rating:

N/A

APPENDICES / ATTACHMENTS

EIA assessment

SIA Assessment

Housing Allocations Policy 2025 Post consultation comparison Document

Consultation Responses

Consultation Comments and demographics

Housing Allocations Policy 2025 - Final

