

Appendix 4

Cambridge City Council – Lettings Policy consultation August 2015

Members of the public and Home-Link applicants were consulted on the key Lettings Policy changes via a questionnaire at the Annex listed below. The consultation was advertised on the Council’s website and all Home-Link applicants were sent an email encouraging them to respond to the consultation. Table 1 below provides a summary of the responses received

Table 1: Summary of responses from members of the general public and housing applicants

Proposed change	Number of respondents	Number in favour	Number against	Most prevalent comments from those not in favour	Actions/further amendments
Discounting those subject to immigration control as household members	57	53*	4	<ul style="list-style-type: none"> It will cause overcrowding and is unfair Cases should be treated individually rather than having a blanket rule A blunt instrument to deal with potential exploitation of the rules It will lead to unintended consequences 	<p>Each application will be considered individually. We propose to add a sentence to paragraph 3.1.3 to clarify this.</p> <p>The new paragraph 3.1.3 sets out matters that the Council can take into account in deciding whether the person subject to immigration control forms part of the applicant’s household</p>
Amendment to clause for those assessed as having intentionally worsened their housing circumstances to gain an advantage on the housing register	56	48*	8	<ul style="list-style-type: none"> People may be forced to move to smaller properties for financial reasons People should not be penalised for well-intended mistakes 	<p>No further amendments proposed.</p> <p>In assessing</p>

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Proposed change	Number of respondents	Number in favour	Number against	Most prevalent comments from those not in favour	Actions/further amendments
				<ul style="list-style-type: none"> • People with medical issues may move for good reason even if it technically 'worsens their circumstances' • People may move to a less suitable property to avoid homelessness • Worsening circumstances is a subjective assessment • Does not allow for sufficient discretion 	<p>applications the Council will consider individual circumstances and the reasons for the changes in housing circumstances.</p> <p>Paragraph 4.11</p>
<p>Proposed sanction for band A applicants who refuse more than 3 reasonable offers of accommodation</p>	<p>57</p>	<p>50</p>	<p>7</p>	<ul style="list-style-type: none"> • Sometimes adverts are not clear enough • It's a choice based system and people should not be forced to accept offers that are not right • Unfair and unreasonable • Proposed change is too vague on when this should apply 	<p>Paragraph 4.14</p> <p>This paragraph gives the Council discretion to carry out a review of Band A applications. Sub-paragraph (d) would only apply if the refusals evidenced a change in assessed need.</p> <p>It is proposed to add a sentence to (d) to clarify this.</p> <p>One of the actions identified by the EQIA is to provide</p>

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Proposed change	Number of respondents	Number in favour	Number against	Most prevalent comments from those not in favour	Actions/further amendments
					a clear guidance document for officers on carrying out these reviews.
Offer 'emergency housing status' to terminally ill applicants who are already in band A	57	53	4	<ul style="list-style-type: none"> No reason to award additional priority as housing requirement is temporary 	<p>No further amendments proposed.</p> <p>While it may be true that the housing requirement is temporary, the nature of terminal illness is that it is not finite in length and the change in policy should allow more people to live out their final days in a property that is suitable for their needs.</p>
Offer 'emergency housing status' or make direct offers of accommodation to Council tenants who are losing their homes because the Council wishes to redevelop the houses where they live.	56	52	4	<ul style="list-style-type: none"> The Council should not be permitted to evict people simply because they wish to redevelop their homes Not fair on others on the register who have waited a long time Health & social care services and/or family should provide housing solutions for the terminally ill 	<p>No further amendments proposed.</p> <p>Two respondents considered that the Council's approach to redevelopment was wrong and</p>

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				<ul style="list-style-type: none"> The whole redevelopment process needs a rethink – more houses need to be built to match those redeveloped 	<p>one considered that it was unfair to people who had been waiting a long time.</p> <p>The Council's long term approach to redevelopment is to replace units on a like for like basis. The Council is committed to maintaining high standards across its housing stock.</p>
<p>Make direct offers to homeless applicants at the point the Council accepts a duty rather than allowing an additional 3 month bidding period.</p>	<p>56</p>	<p>52</p>	<p>4</p>	<ul style="list-style-type: none"> Reducing choice for homeless applicants is not just Should be looked at on a case by case basis Puts too much pressure on people to move when they are already in a difficult situation 	<p>No further amendments proposed.</p> <p>Although choice will be reduced, the proposal will mean that homeless households are able to move into long term homes more quickly. Applicants can request a "suitability review"</p>

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					if they consider that the offer of accommodation that the Council has made to discharge statutory homeless duties is unsuitable.

*One respondent qualified the 'yes' vote by saying that this change should only apply to new applicants

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Home-Link Registered Providers (RPs) and partner local authorities that sit on Home-Link Operations Group and Home-Link Management Board (HLMB) have been formally consulted throughout the process culminating in a final agreement on the proposals at HLMB on 11th June 2015. Partners represented on these groups include the following:

- St Edmundsbury District Council
- Forest Heath District Council
- East Cambridgeshire District Council
- Fenland District Council
- South Cambridgeshire District Council
- Huntingdonshire District Council
- CHS Group
- Sanctuary
- Circle Anglia
- Havebury
- Luminus
- Axiom
- Jephson
- Aldwyck
- Cotman
- Cross Keys
- Flagship
- Guinness
- Hanover
- Hastoe
- Hyde
- Longhurst
- Orwell
- Paradigm
- Riverside English Churches Housing Group
- Stonewater (formerly Raglan)
- Accent Nene
- Bedfordshire Pilgrims Housing Association
- Broadland
- Circle Housing Wherry
- Home Group

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- Hundred Houses
- King Street
- Metropolitan
- Muir
- Orbit
- Papworth Trust
- Suffolk Housing

Home-Link RPs, partner local authorities and strategic homelessness partners in Cambridge were also consulted on the key proposed changes via the questionnaire listed below. There were 10 respondents to the questionnaire from this group. These were Havebury, Luminus, Circle Housing Wherry, Hundred Houses, Riverside ECHG, Flagship Homes, Kings Street Housing Society, Wintercomfort, Cambridge Women's Aid and Suffolk Housing and a summary of the responses is listed within table 2 below:

Table 2: Summary of responses from Home-Link partners and local homelessness strategy delivery partners

Proposed change	Number of respondents	Number in favour	Number against	Most prevalent comments from those not in favour	Actions/further amendments
Discounting those subject to immigration control as household members	10	10			
Amendment to clause for those assessed as having worsened their housing circumstances to gain an advantage on the housing register	10	8	2	<ul style="list-style-type: none"> • There should be special exemptions for medical cases where appropriate • Should be able to demonstrate an intent to worsen circumstances before penalising 	In assessing applications the Council will consider individual circumstances and the reasons for the changes in housing circumstances
Proposed sanction for band A applicants who refuse more than 3 offers of accommodation	10	9	1	<ul style="list-style-type: none"> • Applicants should be downgraded to a lower band rather than suspended 	Sub paragraph (d) would only apply if the refusals evidenced a change in assessed need.
Offer 'emergency housing status' to	10	9	1	<ul style="list-style-type: none"> • Priority date should be 	Response

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Proposed change	Number of respondents	Number in favour	Number against	Most prevalent comments from those not in favour	Actions/further amendments
terminally ill applicants who are already in band A				backdated rather than emergency housing status awarded	considered. No further amendments recommended
Offer 'emergency housing status' or make direct offers of accommodation to Council tenants who are losing their homes because the Council wishes to redevelop the houses where they live.	10	9	1	<ul style="list-style-type: none"> There is a disparity here because people in private rented homes being redeveloped would not be awarded the same status 	No further amendments recommended.
Make direct offers to homeless applicants at the point the Council accepts a duty rather than allowing an additional 3 month bidding period.	10	10			

It should be noted that there is an error in the consultation in that the draft policy does not say that people who are applying to join the register cannot include those who are subject to immigration control as members of their household. The Council will consider each application individually and the policy sets out matters that the Council can take into account in deciding whether a person who is subject to immigration control forms part of the applicant's household

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Annex – consultation questionnaire

1. The Council has proposed that people who are applying to join the register cannot include those who are subject to immigration control as members of their household. We are doing this because allowing housing applicants to add these individuals may favourably affect the priority we would give them and the number of bedrooms they would be entitled to and, it is felt that this is fair and reasonable given that housing is in short supply in the district.

Do you agree with this change?

Yes

No

If not, please state why below:

2. The Council has provision in its policy to ensure that housing applicants who have made their own circumstances worse should not get additional priority as a result. We have changed the policy slightly to ensure that applicants do not need to have known the policy before taking the action that they have to 'worsen their circumstances'.

Examples where applicants may be considered to have 'worsened their circumstances' are:

- *Deliberately overcrowding your own home*
- *moving to a smaller property which is inadequate for your family size*
- *selling a property and spending the proceeds without securing alternative housing*
- *moving to a property clearly unsuitable for the medical needs of an applicant or household member.*

Do you agree that applicants should not benefit under the lettings policy regardless of whether they knew the way the Council prioritises applications on the register?

Yes

No

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If not, please state why below:

3. The Council has proposed that housing applicants in the highest priority group (band A) on the register have their applications suspended if they refuse 3 offers of accommodation. This change is recommended because band A is considered to be an 'urgent' housing status and regular refusal of accommodation offers may call this into question. This provision would be at the discretion of the Council and not automatic.

Do you agree that applications in band A who reject more than 3 offers of accommodation should have their applications suspended for 6 months in certain circumstances?

Yes

No

If not, please state why below:

4. There is a proposal within the revised lettings policy to prioritise people who are in band A and are terminally ill above all others in band A and give them an 'emergency status'. This is because the date a banding priority is awarded determines which bid for accommodation finishes highest. People who are terminally ill do not have the luxury of time to wait for their priority date to become a significant factor in the bidding process.

Do you agree that people who are terminally ill and are already in the highest band should be given this extra level of priority over others also in urgent housing need?

Yes

No

If not, please state why below:

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5. The Council is also proposing to award 'emergency status' (see explanation in the previous proposed change) or make direct offers of accommodation to Council tenants who are losing their homes because the Council wishes to redevelop the houses where they live. The Council needs to rehouse people affected by redevelopments quickly so that the costs of improving such housing schemes are minimised.

Do you agree that people who are affected by redevelopments and asked to leave their homes should be given the opportunity to move as quickly as possible?

Yes

No

If not, please state why below:

6. The Council wants to minimise expenditure on the temporary accommodation it provides to housing applicants who are homeless. Under the existing policy the Council has to wait 3 months before making direct offers of accommodation to homeless applicants it has a duty to house. This change would mean that a direct let could be offered as soon as a duty is accepted. It would, however, mean that homeless applicants would have a shorter period of choice to bid for accommodation but will reduce the overall cost of temporary accommodation.

Do you agree with this change?

Yes

No

If not, please state why below: