

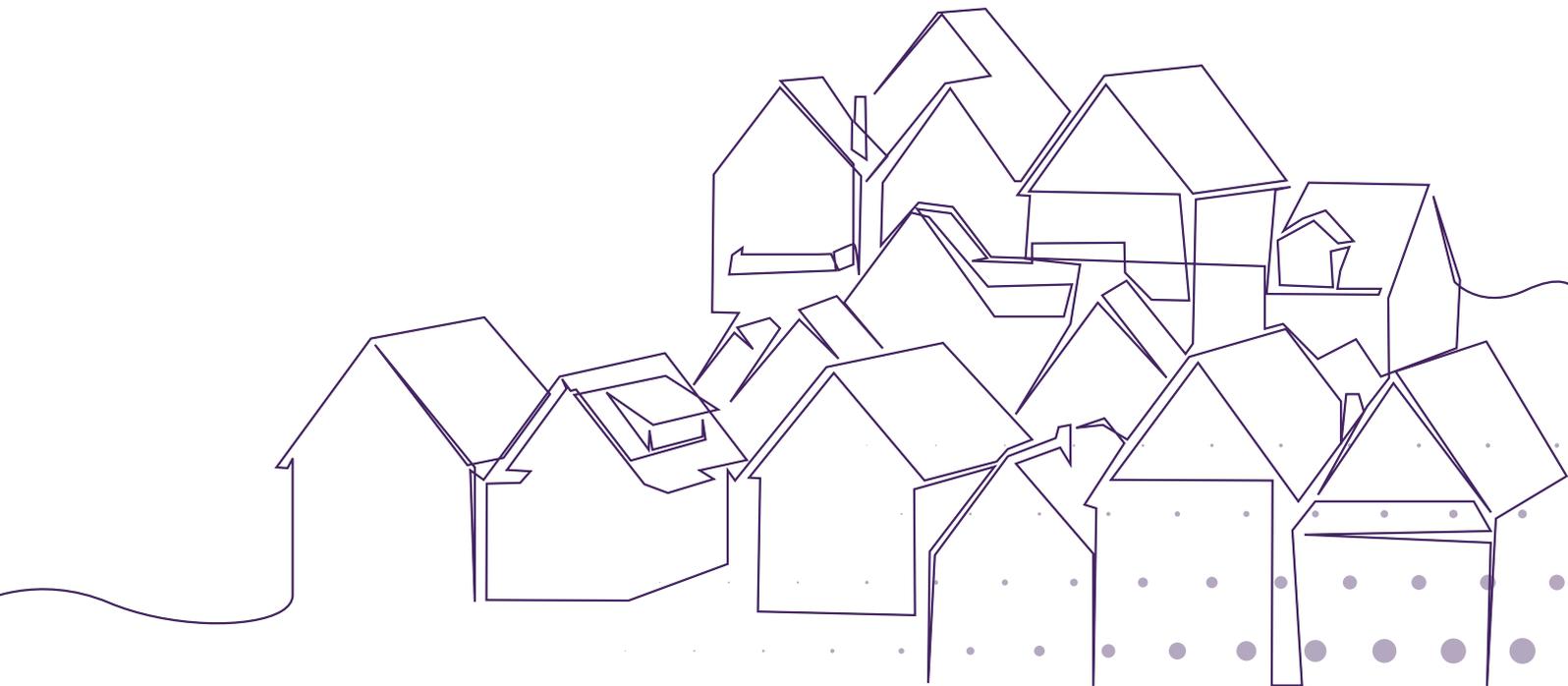


Chartered
Institute of
Housing



Rethinking allocations

September 2019



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About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals and their organisations with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world.

Further information is available at: www.cih.org

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Executive summary

We are in the middle of a significant housing crisis, and for those affected its consequences are profound. For decades, we have failed to build enough homes and those we have built are not always the right types of homes in the right places and at prices people can afford. To compound matters, our welfare safety net is no longer fit for purpose. As a result, more and more people are turning to local authorities and housing associations for help to access social housing. But evidence shows that there is a backlog of housing need of least 4 million households in England, which continues to grow ([Bramley, 2019](#)), while government statistics show that new social lettings are going down, and have been for the last four years ([MHCLG, 2018](#)).

This mismatch in supply and demand places considerable pressure on allocation systems that are designed to decide who gets access to existing homes, resulting in increased rationing to target homes at those in greatest need. We can expect this behaviour to continue until we have enough social housing supply.

This research has been conducted in response to concerns raised about the potential impact of rationing processes, particularly in relation to decisions about who gets access to waiting lists, how those who do get access are prioritised and the potential for pre-tenancy activity to exclude those most in need of social housing.

This report draws on evidence collected via a survey of local authorities and housing associations, sector workshops and a survey of people who have applied for help with accessing social housing. It provides insight into the way social homes are allocated in England to stimulate debate on how local authorities and housing associations can find the best possible balance in their approaches to housing those most in need and creating sustainable tenancies.

Key findings

- The constraints of the current policy environment are affecting many local authorities' and housing associations' ability to balance their objectives when approaching the allocation of social housing.
- Providing homes to people who need them the most is an important objective for the majority of organisations in their approaches to allocating social homes. Ensuring tenancies are sustainable is also very important, but activity to help achieve this is undermining efforts to house those who need homes the most.
- There are three distinct stages in a system for allocating social homes and related processes and criteria vary across the country and across organisations. Processes that fail to account for individuals' unique circumstances and housing histories can create unnecessary barriers for households most in need of social homes. Local authorities and housing associations can achieve a better balance in the current environment if their policies and practice are people-led rather than process-led.
- The choice-based lettings (CBL) model remains the most commonly used system for allocating social housing but whether it remains the right model in the current environment will depend on a range of important influencing factors.
- Nominations agreements can be effective mechanisms for balancing the needs and priorities of local authorities and housing associations when allocating social housing in an area but a lack of guidance on their development and use prevents organisations from realising their potential.

The report provides valuable insight for anyone interested in, or involved in, developing or delivering systems for allocating social housing in England, from frontline practitioners and policy makers (national and local), to organisations seeking to drive change in this area and those wishing to expand their understanding of this key housing topic.

Throughout the report, we provide practice examples and make a range of recommendations for central government and for those involved in systems for accessing social housing.

Recommendations for central government include:

- Government should make a significant investment in a ten-year grant funding programme for social house building.
- Government should suspend the Right to Buy to prevent further loss of social rented homes.
- Government should allow councils to retain receipts from Right to Buy sales.
- Government needs to invest in local housing allowance (LHA), so that more people have the financial support they need to afford a decent home in the private rented sector (PRS).
- Government should remove the reduced benefit cap and the bedroom tax.
- Government should invest in a long-term programme of housing-related support.
- Affordability should be included in the statutory reasonable preference groups.
- Government should consolidate a single code of guidance for local authorities on the allocation of social housing in England.
- Government should work with local authorities and housing associations to develop a toolkit that supports the delivery of support-focused pre-tenancy processes.
- Government should develop a toolkit to support local authorities and housing association in the development, monitoring and review of nominations agreements.

Recommendations for those involved in systems for accessing social housing include:

- Local authorities should ensure applicants' unique circumstances and housing histories are considered when making decisions about whether someone can access a list and what priority they are given.
- Local authorities should review any restrictions that form part of their allocation schemes.
- Local authorities should provide meaningful advice and options for people excluded or who face restrictions as part of their allocation processes.
- Local authorities and housing associations should adopt pre-tenancy processes that prioritise supporting people into sustainable tenancies rather than informing decisions about whether to allocate the tenancy.
- Providers should consider making a proportion of their properties part- or fully-furnished.
- Providers should review their lettable standard to explore ways to improve the marketing of properties, particularly in areas of low demand.
- Local planning authorities should take a more considered approach to agreeing section 106 local connection requirements.
- Local authorities and housing associations should work in partnership to strengthen the role of nominations agreements in how they balance competing objectives.

Introduction: why rethink allocations?

We are in the middle of a significant housing crisis, and for those affected its consequences are profound. For decades, we have failed to build enough homes and those we have built are not always the right types of homes in the right places and at prices people can afford.

To compound matters, our welfare safety net is no longer fit for purpose. A decade of substantial reform has had the worst consequences for those least able to deal with it and who have seen their ability to find and keep a decent home they can afford diminish as a result. During this time, levels of poverty, destitution and homelessness have risen, while levels of rented housing that is genuinely affordable continue to shrink. More and more people are finding themselves locked out of home ownership and those who cannot secure an affordable option, that is of a decent standard, in the private rented sector are turning to local authorities and housing associations for help.

Social housing plays an important role in tackling poverty and homelessness and for many people it is the only suitable option, but evidence shows that there is a backlog of housing need of least 4 million households in England, which continues to grow ([Bramley, 2019](#)), while government statistics show that new social lettings are going down, and have been for the last four years ([MHCLG, 2018](#)). This mismatch in supply and demand places increased pressure on allocation systems that are designed to decide who gets access to this limited resource.

As a result, there are concerns about the potential for these rationing systems to exclude people who need access to social housing the most. The issue was raised in our [Rethinking social housing](#) (RSH) project and was echoed in the [2019 Homelessness Monitor for England](#). In fact, concerns about how

people can access social housing (via supply and allocation policies), particularly in relation to tackling homelessness, have been raised in the [annual Homelessness Monitor](#) in all eight consecutive years it has been reporting on the impacts of economic and policy developments on homelessness in England.

[Shelter's final report on their commission into the future of social housing](#) (2019) reminds us that the shortage of social housing has led to increased rationing, creating pressure to target existing homes to those in greatest need. We can expect this behaviour, and issues arising from it, to exist until we have enough supply of social housing.

The main system for making these rationing decisions, and through which people must navigate in order to access social housing, is a local authority's statutory allocation scheme. These vary from area to area due to the considerable amount of flexibility available to local authorities when developing them. While they do have to comply with some broad nationally set rules ([part 6 of the Housing Act 1996](#)), they can still decide who qualifies to join their waiting lists and how much priority they get.

A final layer of decision-making takes place immediately prior to someone signing for the keys to a new home, most commonly known as the pre-tenancy stage. Most social landlords, including local authorities and housing associations, conduct some form of assessment before starting a tenancy but what this entails will vary depending on the organisation, raising questions about what decisions are being made about who is and is not getting access and why.

As a result of the concerns being raised about the processes involved in the allocation of social housing and their impact on people who need access to homes the most, we explored the area in more detail. This report expands on four central themes to emerge from our research:

1. The impact of the wider policy environment on how local authorities and housing associations can balance key objectives in their approaches to allocating social homes.
2. The importance of local allocation systems being people-led rather than process-led when attempting to house those most in need at the same time as creating sustainable tenancies.
3. The role of choice-based lettings (CBL) as a model for allocating social homes in the current policy and practice environment.
4. The role of nominations agreements as a mechanism for balancing the needs and priorities of local authorities and housing associations when allocating social housing in an area.

Throughout the report, we provide practice examples and make recommendations for central government and those involved in systems for accessing social housing.

How we did it

We used a range of methods to help explore our research questions, including:

-  A desktop review of existing literature
-  A Twitter debate
-  An online sector survey
-  Workshops
-  An online survey for people who have applied for social housing

More details of our methodology can be found in appendix B.

What we did

Our aim was to explore current approaches, in England, to allocating 'general needs' (non-specialist) social homes for rent and consider how they may be allocated in the future. We focused on social housing landlords - including housing associations, local authorities and arms-length management organisations (ALMOs) - and local authorities that no longer have their own housing stock but retain the statutory housing function.

To achieve this, we aimed to understand the following:

- The range of criteria used by local authorities and housing associations when deciding how to allocate social housing
- The extent to which approaches to the allocation of social housing are being shaped or influenced by the current policy environment and the impact this might be having on who can access social housing
- The types of practice that best reflects existing perceptions of who social housing should be for



What we found

National policy factors

The wider policy context for housing and welfare is influencing how organisations balance their objectives when approaching the allocation of social housing.

Our research revealed how the constraints of the current policy environment are affecting many local authorities' and housing associations' ability to achieve an acceptable balance in their approaches to meeting housing need.

Overall, homelessness levels are the most significant factor in approaches to allocations for 80 per cent of survey respondents, followed by a lack of affordable rented housing in an area (68 per cent). Exploring this issue further, workshop participants talked a lot about the impact of a reduction in the amount of social rented homes available and insufficient new supply, the impact of Affordable Rent homes often not being affordable and the impact of a variety of cuts and changes to help with housing costs in a number of working age benefits.

The main policy areas discussed are briefly explored below.

Supply and affordability

Our [Building Bridges](#) report specifically highlighted that despite the "continued common purpose, there has been a growing gap between the urgent need of local authorities to house people in the greatest housing need and the ability of housing associations to build or let at rents that many of those in need can afford" (Fraser et al 2017).

Supply issues vary across the country. In areas with higher housing pressures e.g. the South, East and to some extent the Midlands, there is not enough social housing and what is available is often unaffordable, especially where housing costs are

highest. Where supply is not the main challenge e.g. in some Northern areas, homes are often not of the right size or quality, and as a legacy of the region's industrial past, some homes are no longer in the locations where people want and/or need to live. Combined with the impact of welfare policy changes, this is creating areas of low demand.

The net loss of social rented homes, mainly through the Right to Buy and other sales, and the ongoing conversion of (mainly housing association) homes from social rent to Affordable Rent on re-letting are exacerbating the supply problem. [Our analysis](#) shows that we have already had a net loss of 165,000 social rented homes since 2012 and unless we see significant policy change, the overall loss will reach almost 200,000 by 2020 (CIH, 2019).

Social housing is now the smallest main tenure, but this does not reflect demand for homes within it. We know that, overall, we need at least 340,000 new homes per year in order to meet need and at least 90,000 of these need to be at the cheapest social rent levels ([Bramley, 2019](#)). But during 2017/18 only 6,434 (including 348 London Affordable Rent homes) of the total 47,124 affordable homes built were for social rent ([MHCLG, 2019](#)).

Each year, as part of our annual [UK Housing Review](#) we analyse levels of current government investment in housing. This year's analysis shows that social house building is still not getting the financial backing it needs. Funding is heavily skewed towards the private market and homeownership, with just 21 per cent of current investment earmarked for affordable housing supply. A significant difference could be made by rebalancing existing spending plans so more funding is available for social housing.

The National Housing Federation set out in [their submission the 2016 Autumn Statement](#) how housing associations see themselves as part of the solution to the housing crisis. But because the current funding environment is most focused on delivering homes within the Affordable Rent regime, or market housing as a means to cross-subsidise affordable housing development, providers are catering for different groups of people - more from working or middle-income households - who are being increasingly locked out of homeownership. Resulting development plans can compromise their ability to house people who need homes the most.

The [Homelessness Monitor for England \(2019\)](#) reflects on the sharp drop in the number of new lettings to new tenants over the last twenty years - the number of lets in 2017/18 were less than half the level in the late 1990's and the proportion of a declining number of new lets being allocated to homeless households is also decreasing. The authors refer to the 2019 UK Housing Review's analysis of lettings data for the period 2007/8 to 2017/18 to highlight the drop in new lettings, equivalent to 18,000 tenancies, going to homeless households "despite statutory homelessness having risen substantially over that period" (p.19). The 2019 Homelessness Monitor and [Crisis' 2017 Moving On report](#) both indicate that homeless households are disproportionately affected by this decline in new lets by both housing association and local authority landlords.

The 2019 Monitor tells us how local authorities continue to face difficulty in helping people who are homeless or at risk of homelessness to access social tenancies. There is a recognition, especially in areas of higher housing pressures in more Southern regions, that there is not enough social housing to meet demand for this group of people. And in Northern areas, while overall supply issues are having an impact albeit on a smaller scale, there is more concern over undersupply of the right types (size, quality and/or location) of housing.

Affordable Rent

The Affordable Homes model was introduced by the Coalition government as part of the October 2010 spending review. It allowed housing associations to offer tenancies with rents set at up to 80 per cent of the market value in the area. Any additional revenue raised as a result was available for providers to reinvest in the development of new social housing.

Since 2012, local authorities have also been permitted to charge Affordable Rent levels on homes where they have an agreement under the [Affordable Homes Programme](#). Despite this, take-up has been limited, especially when compared with housing associations. In the three years to 2017/18, Affordable Rent lettings formed about 24 per cent of total general needs lettings by housing associations, but only two per cent of those by local authorities ([Fitzpatrick et al, 2019](#)). This suggests that almost one quarter of all new lets by housing associations will be at rent levels higher than equivalent local authority lets. We already know that Affordable Rents are more expensive than social rents throughout England, with the difference most noticeable in the South ([JRE, 2018](#)).

The rise of the Affordable Rent product has taken place alongside a range of policy developments that have not only systematically reduced the number of homes to let at social rent levels but have also severely impaired many people's ability to afford or access the alternatives. The Affordable Rent policy intention, to maximise the delivery of new social housing and provide an offer which is more diverse for the range of people accessing social housing ([Wilson and Bate, 2015](#)), has been seriously undermined by these policy developments, including:

- how much benefit support people receive towards their housing costs;
- the extended Right to Buy;



- restrictions on use of receipts that impede local authorities' ability to replace homes sold on a one for one basis; and
- funding and regulatory regimes for housing associations that drive a focus on financial viability.

Compounding matters, the policy enables housing associations to convert homes from social rent to Affordable Rent when they are re-let, which led to a loss of 111,570 social rented homes between 2012-18 ([Regulator of social housing, 2018](#)). A recent decline, however, is likely to continue with the Greater London Authority requiring providers to stop making conversions in the capital and some deciding to voluntarily cease the activity in other areas of the country.

Welfare policy

A range of major welfare reforms, implemented since 2010, will have cut social security spending by £27 billion per year – equivalent to £690 a year for every working age adult - by 2021. Several of these reforms have reduced the amount that working age people on low incomes are entitled to, to help pay their housing costs, in both the social and private rented sectors. In its 2019 report on the [UK welfare safety net](#), the Work and Pensions Committee highlights the impact of “devastating cumulative cuts” to the financial support available to people on lower incomes increasing their risk of poverty, destitution and homelessness.

People affected by these cuts have seen their housing options decline as their purchasing power diminishes and we know from the work carried out by Sheffield Hallam University '[The uneven impact of welfare reform](#)' (2016), that the greater financial loss is generally felt in the most deprived local authority areas.

The evidence on the link between entitlement to help with housing costs and rising homelessness is strong - it is highlighted, annually, by the [Homelessness Monitor for England](#) and [our research with the University of Sheffield \(2017\)](#)

found that 84 per cent of local authorities and 70 per cent of housing associations feel that changes to national welfare policy is impacting negatively on partnership working to tackle homelessness. We have outlined the main welfare policies raised in this research below.

The removal of spare room subsidy (commonly known as 'the bedroom tax')

Since 2013, new rules aimed at making better use of stock and improving mobility levels in the social housing sector were implemented that substantially cut entitlement to housing benefit for social housing tenants deemed to have a 'spare' bedroom. The measure meant that working age people living in social housing who are entitled to housing benefit would only be entitled to help based on the household composition and the size of accommodation they are considered to need. In order to mitigate the impact of the measure, many housing providers have amended their policies to prioritise tenants wishing to downsize, even if they were in rent arrears and to avoid the allocation of a tenancy where it would lead to a shortfall in benefit entitlement ([Hickman et al, 2018](#)).

Our research highlighted the impact that the bedroom tax is having on approaches to allocating social homes. The sector survey found that the bedroom tax is a significant factor in 79 per cent of respondents' approaches to allocations and workshop discussions revealed that the rules have created affordability issues across the country. The effects of these issues are felt most significantly in Northern regions experiencing low demand or where there is a mismatch of available properties and the types of homes people want or need.

Discussions also highlighted that, Discretionary Housing Payments (DHPs) are not an adequate mitigating measure, due to the scheme's short-term and discretionary nature, so some Northern organisations are accepting that some rents will not be fully covered because 'getting some rent is better than getting nothing' (workshop participant quote).

The benefit cap

The benefit cap, intended to incentivise work and reduce the Department for Work and Pensions' (DWP) spending on welfare, was announced in the then Coalition government's 2010 spending review and was implemented in 2013, placing a limit on the total amount of income someone is entitled to from [specific benefits](#) (Entitled to, 2019). Total household benefits were capped at the average median household income (£26,000 per year for families and £18,200 per year single people with no children). Households with income from benefits in excess of these caps would be subject to a reduction in their housing benefit entitlement. In 2016 the cap threshold was lowered by the Conservative Government to £20,000 per year for families (£23,000 in London) and £13,400 for single people with no children (£20,000 in London).

Official figures available at the time of writing this report show that more than 40 per cent of the 53,000 households affected across Great Britain are losing more than £50 a week. This means that thousands of families are struggling, on a daily basis - many are going without food or heating, so they can pay for their housing, or they are falling behind with their rent and facing homelessness ([CIH, 2018](#)).

Our sector survey found that the benefit cap is a significant factor in 59 per cent of respondents' approaches to allocations and expanding on this, our workshop discussions revealed that the cap has made many homes unaffordable across the country, particularly those let at Affordable Rent levels and especially in higher housing cost areas. These discussions confirmed the view that DHPs cannot provide a reliable solution for people affected.

Local housing allowance (LHA)

LHA rates stipulate the maximum amount of financial help towards housing costs working age people on low incomes are entitled to when living in the private rented sector (PRS). Our 'Cover the cost' work with Crisis (2019) details how a series of changes to these rates since 2011 has limited claimants to a declining proportion of the PRS. This research showed that, in 2018/19, the growing gap between LHA rates and actual market rents meant that 97 per cent of areas in England were unaffordable to single people or a couple or small family relying on benefits to help cover their housing costs.

Resulting issues of unaffordability in the PRS, despite targeted affordability funding as our [Missing the Target](#) (2018) work shows, are pushing up demand for a declining resource of genuinely affordable housing for rent in the social sector. Under-investment in LHA rates not only increases the risk of someone becoming homeless as many people struggle to cover the shortfall between their entitlement and rent, it also limits people's housing options when they become homeless.

Our workshop discussions highlighted that many local authorities are increasing their efforts to engage with the PRS in their areas to enhance what they can offer both landlords and applicants to alleviate this growing demand.



Universal credit (UC)

In a significant overhaul of the benefit system, UC combined a range of benefits, including housing benefit, into one single monthly payment. The policy's aims, [according to DWP \(2015\)](#), were to simplify the benefit system, make work pay, reduce in-work poverty and minimise fraud and error.

UC is paid monthly in arrears, to mimic the monthly salary cycle, so it can typically take up to a minimum of five weeks for someone to receive their first payment. In 2018, the National Audit Office's report '[Rolling out Universal Credit](#)', highlighted that a quarter of all new UC claims in 2017 were paid late, with one in five of these claimants waiting 5 months or more. UC Claimants are able to request an advanced payment, but these are loans which must be repaid in the form of automatic deductions from future UC entitlement. [The Trussell Trust's view on advance payments](#) is that they leave claimants with a choice to either live without any income at all, or to struggle with a reduced income when repaying their advance.

In 2018, UC's 'digital by default' approach attracted criticism from the United Nations Special Rapporteur on extreme poverty and human rights, who found that with very little digital assistance available, it acts as a barrier, effectively obstructing access to benefits.' ([United Nations Human Rights Council, 2018](#)). Citing DWP's own figures they highlight that almost half (46 per cent) of all digital applicants in 2018 needed help to complete the online form.

Our sector survey revealed that UC is a significant factor in 59 per cent of respondents' approaches to allocations and our workshop discussions highlighted how landlords often require rent in advance (explored in more detail below) to mitigate the impact of the lengthy delay in UC claimants receiving their first payment. This requirement can create considerable barriers for people trying to secure a social home if they

do not have the financial resources required. Participants also told us they are investing a lot of resources in helping claimants to navigate the online system and that applicants with unmet support needs require more intensive support.

Cuts to funding for support services

Government funding for local authorities in England has fallen significantly since 2010, leading to a halving of funding, in real terms, by 2018, while demand for key services has risen during the same period ([Housing, Communities and Local Government Committee, 2019](#)). As a result of these pressures, support services have faced particularly deep cuts and a [report by the New Policy Institute](#) in 2018 confirmed that local authorities most reliant on government grant are having to make difficult budget decisions that divert investment away from housing support and prevention-focused services in order fund statutory services.

The [LGA's Homelessness Reduction Act survey 2018 report](#) highlights the concerns being raised by local authorities, about the impact of reduced investment in support services that help to prevent homelessness, because of declining levels of local authority general revenue support grant funding from central government. These are well-founded concerns. Analysis conducted by [WPI Economics for St Mungo's and Homeless Link \(2019\)](#) revealed cuts to local authority funding had led to a reduction in spending on support services for single homeless people by 53 per cent between 2008/9 and 2017/18.

Limited funding for housing related support services and cuts to other public services is a growing problem which was raised in all five of our workshops. Participants talked about how refusals of nominations due to unmet/too high support needs are increasing and one provider highlighted that they are now having to 'turn away

more people because of their support needs than because of affordability' (workshop participant quote).

This issue was identified in our 2017 [Tackling homelessness together](#) research with the University of Sheffield that highlighted growing 'concerns around letting homes to applicants "characterised by socioeconomic exclusion", homeless households with multiple/complex needs, or otherwise vulnerable', with approximately 51 per cent of local authorities and 50 per cent of housing associations citing 'unmet support needs' as one of the main reasons they would reject a nomination of a homeless household, compared with [17 per cent in 2007](#).

All of our workshop discussions highlighted that funding for floating support is important and that sufficient investment in this type of support would mean social landlords could help more people. The main point highlighted in these discussions was that housing related support can help people access and sustain suitable housing but access to universal support services can reduce the need for housing related support in the first place.

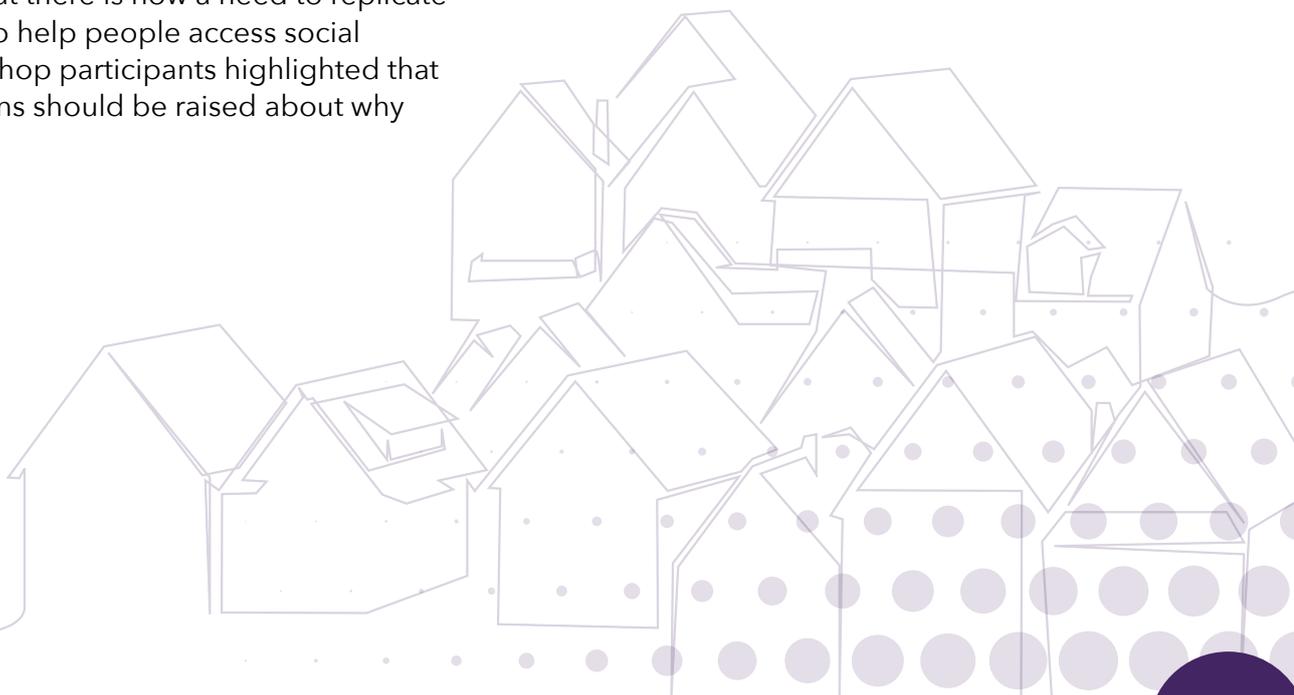
A key point, made at more than one workshop, was the sense that councils are better at supporting people into the PRS because of the barriers people face in accessing this type of housing, but that there is now a need to replicate this approach to help people access social housing. Workshop participants highlighted that serious questions should be raised about why

people are potentially facing similar barriers to accessing social homes as they do when trying to access PRS homes.

Our sector survey highlighted the impact of a decline in appropriate supported accommodation, linked with these cuts. Where supported accommodation would ordinarily be the most suitable housing option for someone, general needs social housing is often now the only option, but there are concerns about the sustainability of tenancies where a certain level of support is needed but is not available.

A report for the Smith Institute ([Chevin, 2014](#)) found that reductions to Supporting People grants had made supported housing a "high risk area" for many providers. They quote Jeremy Porteous of the Housing Learning and Improvement Network as saying that cuts to local authority budgets, uncertainty over long-term revenue streams, welfare reforms, rising salary costs and increasing regulation have all led to housing associations getting out of providing specialist supported housing.

There is also a strong argument for scaling up Housing First, alongside other supported housing options, to provide an appropriate housing option for homeless people who have high, multiple and complex needs ([Blood et al, 2018](#)).



Recommendations for central government

Supply and affordability

- **Government should make a significant investment in a ten-year grant funding programme for social house building.** Our RSH work and Shelter's commission on the future of social housing, evidences a growing consensus that building more homes for social rent must be at the heart of any government plans to solve the housing crisis. The private market alone cannot provide the amount and types of homes we need across the country.

CIH have joined the National Housing Federation (NHF), Shelter, Crisis and the Campaign to Protect Rural England (CPRE) to make clear what the government needs to do to provide the right homes in the right places and at prices people can afford.

Based on research for Crisis and NHF ([Bramley, 2019](#)), an annual investment of £12.8 billion is needed to fund a 10-year capital grant funding programme to build almost one and a half million social homes, with at least 90,000 of these being at social rent levels each year, across the country. This level of investment would add £120 billion to the economy, annually, through the creation of jobs - effectively generating at least £5 for every £1 spent.

- **Government should suspend the Right to Buy to prevent further loss of social rented homes.** Since its introduction, nearly two million homes have been sold under the Right to Buy and preserved Right to Buy. Since discounts were substantially increased in 2012, despite a government commitment to ensure replacement on a one-for-one basis, 67,000 homes have sold with only 18,000 replacements being started.

At a time when we need to increase the supply of genuinely affordable homes, alternative ways to support people into home ownership, including ongoing investment in shared ownership, will be more appropriate.

- **Government should allow councils to retain receipts from Right to Buy sales.** It is essential that existing receipts from recent sales are used to full effect to build the maximum number of homes possible. [Our previous research](#), carried out with the National Federation of ALMOs (NFA) and the LGA (2015), highlights the barriers to one-for-one replacement.

Welfare

- **Government needs to invest in LHA, so that more people have the financial support they need to afford a decent home in the PRS.** The undersupply of affordable housing, particularly homes for social rent, means that more people are relying on the PRS to meet their housing needs. The latest [English Housing Survey \(2019\)](#) shows that the PRS has doubled in size since 2002, now housing 4.5 million, or 19 per cent of households. Whereas the social rented sector is the smallest tenure, housing 4 million, or 17 per cent of households.

While we work to build enough social homes to help solve our housing crisis, we need to ensure the PRS is an affordable option for the many people who are currently unable to access the limited supply of what we do have.

Our work with [Crisis \(2019\)](#) shows that any efforts to reduce homelessness will be undermined unless government invests in LHA rates to bring them back in line with the cheapest 30 per cent of market rents and to fully restore CPI indexing so people can access the proportion of the market the policy originally intended.

- **Government should remove the reduced benefit cap.** The reduced benefit cap, which affects nearly 65,000 households across the country, is needlessly pushing people into poverty and putting them at risk of homelessness. There are grounds to seriously question the policy's purpose when, as our research highlights, even so-called 'affordable housing' is out of reach for families who are subject to the cap.

[Our Feeling the Pinch \(2018\) research](#)

demonstrated how the cap is not achieving the policy's stated aims as, for many affected households, work is not providing a route out of this poverty and [official DWP data \(2019\)](#) clearly shows that most of those who are affected are not currently able to work, either because of a health problem, disability or because of childcare commitments.

- o **Government should remove the bedroom tax.** The 'bedroom tax' has not met its stated objectives ([Gibb, 2016](#)). Savings to the public purse have been smaller than government's original estimates and are insignificant in the context of a £22 billion overall housing benefit bill. Evidence from our research suggests that, in most cases, smaller properties are simply not available for those affected to move to and in some areas the policy has led to family-sized accommodation becoming hard-to-let despite there being a clear housing need.
- o **Government should reduce the initial assessment period to 15 days for nil income claims under UC.** Despite the measures to shorten the period between the date of claim and the first payment of UC from six weeks to four weeks, there is a strong case to shorten the first assessment period for claimants with no other income to 15 days.

Funding for support

- o **Government should invest in a long-term programme of housing related support.** After the ring-fence was removed from the Supporting People programme of funding in 2009, housing-related support spending by local authorities in this area had fallen by up to 85 per cent by 2013 ([Homeless Link, 2013](#)). This was because local authorities were given the flexibility to spend the money on priority areas during a period of significant wider central government funding cuts. Local authorities were effectively redirecting money for non-statutory housing related support to plug the gap left in budgets for core services like care provision, for example.

A national, ringfenced funding stream for housing related support would address the deficit and support the sustainability of existing and new supported housing schemes.

Recommendation for those involved in systems for accessing social homes

- o **Local authorities and housing associations should work together to develop a Local Housing Affordability Framework (LHAF).** As per the recommendation set out in our [Building Bridges](#) report each LHAF should provide:
 - "An agreed, common definition of affordability to which all partners strive to work, based on local household incomes - not a percentage of market prices/rents.
 - Affordability assessed by tenure or product, including service charges where appropriate.
 - A mutually-agreed framework for affordability assessments of applicants.
 - A review of the required tenure/product mix - including relets - to identify:
 - o a target range of incomes that each tenure should meet
 - o numbers of households with unmet need in each target group
 - o the extent to which current products meet the target income ranges
 - o ideal target costs for each tenure/product.
 - Agreed output targets (numbers of homes and range of charges) for each tenure, taking into account available resources
 - An agreed tool which is embedded into local planning and housing policies, and other areas of local decision-making (e.g. Discretionary Housing Payments), and then implemented consistently and robustly on a voluntary basis."



Competing objectives

Providing homes to people who need them the most is an important objective for the majority of organisations in their approaches to allocating social homes. Ensuring tenancies are sustainable is also very important, but activity to help achieve this is undermining efforts to house those who need homes the most.

One of the central questions asked in RSH ([CIH, 2018](#)) was “who is social housing for?”. The resounding answer was that it is for people who need it, a position repeated in this research. Something else that was raised in both pieces of work is the recognition that we are faced with a limited resource – we do not have enough of, and in some areas not the right type of, social housing, so we inevitably use rationing systems to identify those in most need of what we have.

The legislative framework ([Housing Act 1996, part 6](#)) governing the allocation of social housing, which applies to local authorities in England, is designed to ensure that those in the greatest housing need are prioritised with ‘reasonable’ or ‘additional preference’. These preference groups form part of the statutory safety net for people in housing need ([Fitzpatrick and Stephens, 1999](#)).

The framework ([section 166A](#)) stipulates that the following groups must be given reasonable preference in an allocation scheme:

- People who are homeless (statutory definition, [Part 7 Housing Act 1996](#))
- People who are owed certain duties under the statutory homelessness framework
- People who are living in insanitary, overcrowded or otherwise unfit housing conditions
- People who need to move due to medical or welfare needs, including those who need to move because of a disability
- People who need to move to a particular area to avoid hardship

Local authorities have the flexibility to give ‘additional preference’ to people in ‘urgent housing needs’ who fall into one or more of the above categories, but they are required to give additional preference to specified members of the armed forces community (and related persons), who fall into one or more of the above categories.

Social housing is often the only suitable option for many households. [Our analysis with Crisis \(2019\)](#) and work done by [Shelter \(2019\)](#) confirm that the private rented sector (PRS) is increasingly unaffordable in many areas of the country and evidence increasingly highlights that certain groups face particular challenges and barriers to accessing a tenancy in the PRS, including;

- Those on lower incomes ([JRF, 2018](#))
- People in receipt of benefit to help pay their housing costs ([MHCLG, 2019](#))
- People experiencing homelessness ([Crisis, 2016](#)); and/or
- Young people ([Centrepoint, 2018](#))

These issues of unaffordability and restricted access to the PRS are increasing demand for a declining amount of social housing. Our RSH workshops and online surveys revealed concerns about how some providers’ policies and practices are potentially screening out or excluding the people who need access the most ([CIH, 2018](#)).

We explored this issue in our Rethinking allocations online sector survey, by asking local authorities and housing associations about the importance of a range of objectives in how they allocate general needs social homes for rent. Responses show that providing homes to people who need them the most is of greatest importance (diagram below). This was followed by making best use of stock, closely followed by objectives related to ensuring tenancies are sustainable.

	Objectives considered to be very important	Percentage of survey respondents
1	Providing homes to people who need them the most	88
2	Making best use of stock	75
3	Ensuring people can sustain their tenancies:	
	Affordability	73
	Supporting people into sustainable tenancies	70

Housing providers have always faced a 'trade-off' as they seek to meet these competing objectives. But in the current policy environment it is becoming increasingly difficult to find a balance when attempting to achieve them. Aims to house those most in need and to create sustainable tenancies should not be mutually exclusive, but there is a risk that some housing practice is creating a 'Catch-22' scenario. Echoing the concerns raised in RSH ([CIH, 2018](#)), we found that processes aimed at ensuring tenancies are

sustainable can undermine efforts to provide homes to people who need them the most. This creates a perverse situation where the reasons why people may need access to social homes the most can often become barriers to accessing them. This is because activities intended to help achieve sustainable tenancies can often conflict with the reasons why people have been prioritised for housing in the first place, raising serious questions about social landlords' ability to deliver their social objectives.





People versus process: finding a balance

There are three distinct stages in a system for allocating social homes and related processes and criteria vary across the country and across organisations. Processes that fail to account for individuals' unique circumstances and housing histories can create unnecessary barriers for households most in need of social homes. Local authorities and housing associations can achieve a better balance in the current environment if their policies and practice are people-led rather than process-led.

"We do not all fit into tick boxes nor do our individual circumstances. We should be banded with some humanity and not by the tick boxes that do not always reflect our circumstances" (applicant survey quote)

The policy pressures on the sector are significant and while these pressures remain, strict rationing behaviour will persist, and so will the related issues. Nevertheless, important elements of the allocations system are within the control of local authorities and housing associations. Whether processes are people-led, as opposed to process-led, has a significant impact on how organisations balance commitments to housing those most in need with the importance of allocating sustainable tenancies.

Our study uncovered a range of examples of people-led approaches, some of which are shared in this report alongside related recommendations for central government and for those involved in the allocation of social homes across England.

Our research identified three distinct stages in an allocation system (see appendix C for more detail):

1. **Getting on the list** - eligibility and qualification according to a local authority's allocation scheme
2. **Priority** - how people and groups are prioritised in a local authority's allocation scheme

3. **Getting the keys** - landlords' final stage assessments and requirements before a tenancy is created

In the first two stages, applicants are assessed based on their need for housing, so they are asked why they are more in need than the next applicant to give them the best possible chance of being offered a tenancy. However, at the third stage applicants face barriers to securing a tenancy because their needs, whether around support or affordability, present as a potential risk to tenancy sustainment.

Our workshop discussions uncovered a clear distinction between process-led and people-led approaches to the way social homes are allocated during each of the three identified stages.

As one Twitter debate participant reminded us, 'we are talking about people not processes when we rethink allocations' and another participant highlighted that many 'people who need it [social housing] can no longer get onto housing registers'.

Examples of taking a people-led approach include:

1. Getting on the list

- o Reviewing policies and procedures to assess if they are achieving agreed objectives
- o Making the application process simpler
- o Ensuring potentially negative decisions are made on a case by case basis
- o Providing enough information and advice to support applicants to make informed decisions about their applications, including information about all possible housing options

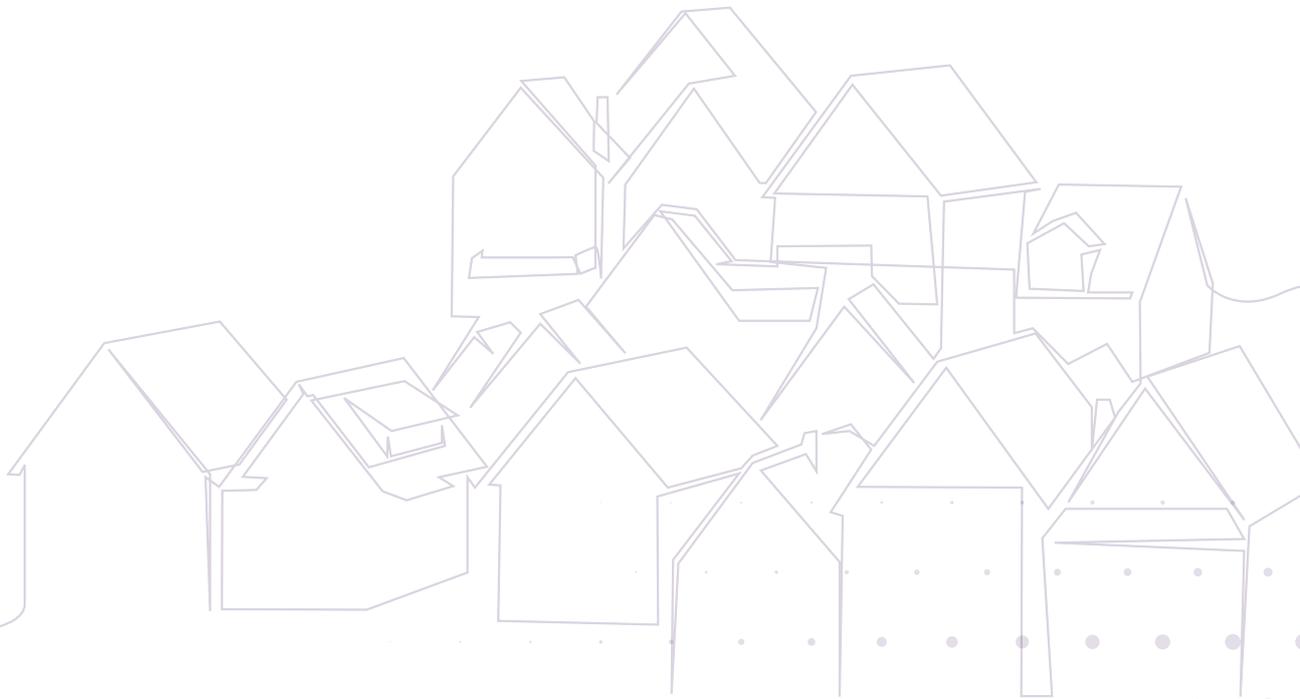
2. Priority

- o Introducing home visits to find out more about applicants' circumstances
- o Having a clear policy and procedure for making decisions on and applying restrictions and making it available to applicants
- o Using priority to avoid disqualifying applicants altogether e.g. allowing people to register and limiting priority is better than disqualification as the former still allows for direct offers/lets and for matching to lower demand properties where appropriate
- o Providing information about pre-tenancy processes in choice-based lettings adverts to enable applicants to make informed choices about whether to bid for properties

3. Getting the keys

- o Making informed decisions about section 106 local connection requirements
- o Adopting a pre-tenancy assessment approach that supports tenancy access and sustainability
- o Working with partners to tap into support resources, including pre-tenancy training
- o Local authorities and housing associations working in partnership to agree a framework for pre-tenancy assessment criteria that is also made available to applicants

This section explores these elements in more detail and offers examples of what others are doing to prioritise people-led practice. Drawing on this further, a series of recommendations are made for central government and for those involved in systems for accessing social homes.





Stage 1) Getting on the list

Under [Part 6 of the Housing Act 1996](#), local authorities in England must publish a scheme that sets how they will prioritise applicants for social housing in their areas. The legislation provides a legal framework with a broad set of requirements that all local authorities must comply with, but amendments made by the [Homelessness Act 2002](#) and the [Localism Act 2011](#) gave considerable scope for flexibility when deciding how to deliver them at a local level.

There are specific categories of people to whom local authorities must give some form of preference (set out above in [Competing objectives](#)), but before this can be applied to someone's application, they must first be eligible and qualify according criteria in an allocation scheme.

People who are ineligible due to their immigration status cannot be allocated housing under the 1996 Act. This type of eligibility is determined by detailed immigration rules intended to remove the scope for discretion. However, the rules are often challenged and are also frequently changed. For these reasons and because of their complexity, it is vital that staff have access to a resource such as the [CIH's housing rights website](#) and that staff use it to ensure that applicants are not incorrectly refused access to housing.

Local authorities may only allocate accommodation to "qualifying persons" but they have a lot of flexibility when it comes to deciding which groups will and will not qualify.

[The 2012 statutory guidance on the allocation of accommodation in England](#) advises authorities to consider the impact of exclusion criteria on certain groups including, people fleeing domestic abuse, people who are homeless or children in care who are placed out of borough. Local authorities are advised to "make explicit provision for dealing with exceptional cases within their qualification rules" (paragraph 3.25).

The statutory guidance reminds authorities of the need to have regard to their duties under equality law, as well as the requirement to give overall priority for an allocation to people in the reasonable preference categories. In our 2014 [New approaches to allocations](#) work we urged local authorities to assess the implications of their allocation schemes on different groups protected from discrimination by the [Equality Act 2010](#). For example, policies which treat applicants who are in work and those on benefits differently, such as permitting under-occupation of a property based on employment status, can adversely impact upon people on benefits and could therefore be open to challenge.

A local authority must assess any introduction of qualification criteria, including residency tests, to explore their potential impact on different groups and to ensure compliance with the legal duty to have regard to the need to safeguard and promote the welfare of children under [section 11\(2\) of the Children Act 2004](#).

Case law, referred to in the Local Government Ombudsman's 2016 report, [Full house: Councils' role in allocating social housing](#), confirmed that allocation schemes cannot, without good reason, disqualify 'groups' of people who would be entitled to reasonable preference and that having discretion to exempt applicants from criteria in exceptional cases cannot justify a policy if individual circumstances are not even considered. In the report, the Ombudsman states that they "take the view that, whether or not a council has included an exceptional circumstances provision in its policy, if an applicant's exceptional circumstances have not been considered, we are likely to find it to be at fault" (page 3).

Residence and connection requirements

In 2013, the Coalition Government issued supplementary guidance, [Providing social housing for local people](#), to help local authorities use the new powers given to them under the Localism Act 2011 to meet the needs of local residents and local communities. Authorities are “strongly” encouraged to adopt a residency requirement of at least two years but are reminded of “the need to provide for exceptions”. The guidance also directs authorities not to apply such test in cases where an applicant is a former member of the armed forces.

In addition, the statutory Right to Move, set out in the [Allocation of Housing \(Qualification Criteria for Right to Move\) \(England\) Regulations 2015](#), prevents local authorities from applying a local connection test that could disadvantage tenants who are seeking to move for work.

Following the introduction of these new flexibilities, the number of households on waiting lists in England dropped, by 40 per cent, from its peak of 1.85 million in 2012 to 1.11 million in 2018 ([MHCLG, 2019](#)), even though real housing demand had risen during this period.

Local connection criteria can present an immediate barrier where those who are assessed as not having one are automatically disqualified from joining a scheme. [Case law](#) has highlighted the potential discriminatory nature of a requirement that means some people from abroad will fail to develop a connection for some time, while having no connection whatsoever to any other local authority areas.

In 2010, the Coalition Government made it clear in their [Local decisions: a fairer future for social housing](#), consultation, that the new flexibilities provided via the Localism Act 2011 should not lead to people who are vulnerable and in housing need losing out. They urged the importance of local authorities continuing to frame their schemes in a way that gives reasonable preference to the groups covered in statute.

62 per cent of respondents to our sector survey include some form of residency requirement in their allocation policy and 34 per cent have both residency requirements and additional local connection criteria. The method for determining a local connection should be consistent the definition set out in [section 199 of the Housing Act 1996](#), but these broad categories allow for a range of criteria to determine local connection, including the number of years the person must have been resident in the area for.

Our workshop discussions revealed that some authorities and housing associations are questioning connection and residency criteria, suggesting that policies can often create unnecessary barriers to meeting housing need. Some local authorities operate an open register, allowing people with no local connection to join their schemes and either reduce their priority or the numbers or types of homes they could be allocated. Some choose to operate an open register and prioritise those with a stronger connection – those who have lived in the area beyond a specified period, for example. The argument put forward for this more flexible approach is that it widens the ‘pool’ of potential tenants to consider for vacant properties.



Other restrictions and sanctions

If someone qualifies to be considered for a social home via an allocation scheme, their application can still be affected through a range of restrictions or sanctions including suspension, reduced priority or removal from a scheme. These can be applied for several reasons, including:

- Lack of activity on an application within a CBL scheme (e.g. bidding, logging in and considering properties)
- Previous tenant history (e.g. arrears, ASB, limited experience of managing a tenancy)
- Means to secure housing in the private sector
- Little or no housing need
- Failure to meet local connection or residency criteria

These types of restrictions or sanctions, alongside criteria to decide who qualifies to join a scheme in the first place can present considerable barriers for people who are often in most need of access to social housing.

Making people your priority when thinking about restrictions and sanctions

Our workshop discussions confirmed that local authority and housing association professionals recognise the importance of assessing individuals' circumstances before making decisions that can restrict access for those in urgent housing need. Professionals who took part in our workshops suggested a range of tools and approaches to avoid restrictions and sanctions undermining the aim to provide homes to people who need them the most, including:

- Developing a service that specifically supports people who are disqualified from accessing assistance via an allocation scheme
- Providing pre-tenancy training
- Linking with neighbourhood and income teams
- Allowing flexibility for lower demand properties

- In cases of former rent arrears, it is important to consider the nature of the debt - is it arrears, rechargeable debt etc? Applicants who demonstrate a willingness to repay may be considered more favourably
- Agreeing good/acceptable behaviour contracts
- Operating an open register, including no local connection restrictions, and apply criteria on a property basis

Discussions revealed five areas for consideration if restrictions and/or sanctions are used:

1. It is important to consider individual circumstances before applying restrictions to ensure they are proportionate and justified.
2. Applicants should be provided with adequate information about restrictions and what steps they can take to avoid them or have them removed, including how to access support to achieve this.
3. It is crucial to ensure alternative options can be explored for those who are disqualified from the scheme or who are facing other restrictions/sanctions.
4. The point at which previous behaviour/ conduct is considered is important. Sometimes restrictions can happen very late in the process causing frustration for applicants and prolonging the amount of time a property is empty.
5. Inconsistencies across policies within a partnership can be an issue. For example, people may qualify for help via an allocation scheme under [part 6 of the Housing Act 1996](#), but then face different policies that exclude them when they are nominated to a landlord within the partnership.

Local authorities are encouraged to ask the following questions in relation to existing restrictions or sanctions before applying them in future:

- What help is available to people who are disqualified from the allocation scheme or who are unlikely to secure a tenancy due to suspensions or other restrictions/sanctions?
- How can housing providers use lettings plans/policies, direct offers and managed transfers to avoid the need for restrictions/sanctions?
- Do you have a clear and consistent process in place to ensure discretion is routinely considered before restrictions are applied?
- What do restrictions mean for applicants' experiences and the aim to let a home as fast as possible?
- How can you use approaches to rent setting, planning for supply and DHPs to balance need with creating sustainable tenancies?

What others are doing

Newcastle City Council (NCC)

Newcastle City Council are piloting a joint working arrangement, between their ALMO's (YHN) allocation service and their own PRS team, that focuses on applicants who have been disqualified from the allocation scheme. A referral can be made to the PRS team to determine what assistance can be given to either find a home in the PRS, to help them become qualified, or, after having met with the person, whether there are mitigating factors to reconsider a disqualification decision or a direct offer.

The pilot is being run as a small-scale trial to inform a decision about whether it will form part of their general allocation policy and procedures. To date the service has been able to help approximately 20 applicants into social housing who would have found it extremely challenging to access a home without the trial either because they were disqualified from bidding or because they had difficulty in representing their circumstances.

Tips for others considering the same approach

- Carefully consider the impact of your digital aspirations. There is no doubt that digital agenda can deliver empowering and cost-effective tools for many applicants and housing providers. However, this can detract from housing providers ability to understand individual circumstances, particularly those who with particular needs and vulnerabilities. Information provided on application forms, for vulnerable applicants, is no substitute for face to face contact, which in many cases presents a very different perspective.
- Through their joint working trial they have determined that face-to-face contact with some applicants enables a far speedier and more satisfactory solution for the applicant. It ensures the sustainability of the housing option and at the same time creating financial efficiencies by renting hard to let properties, reducing incidences of homelessness and associated costs in respect of supporting people due to their lack of appropriate housing.





What others are doing

Camden Borough Council

Camden's CBL scheme does not include any sanctions so there are no penalties when applicants, for example, do not attend viewings or refuse offers having attended viewings. This often raises concerns that homes take longer to allocate as a result, especially in high demand/low supply areas as sometimes homes must be advertised, shortlisted and viewed more than once leading to inefficiencies, extended void times and rent loss.

Having carefully considered whether the introduction of sanctions would resolve the issue e.g. suspension or cancellation from the housing register for applicants who repeatedly fail to attend viewings or refuse suitable offers, they were concerned that restricting freedoms and choice can lead to unintended negative consequences. Introducing sanctions potentially compel applicants to view and accept a home they are not truly happy to live in, leaving them a dissatisfied tenant who may end up applying for another move.

To avoid the use of sanctions, Camden tried several things including improving the quality of the information in their property adverts and calling shortlisted bidders to give them more information about the home they have bid on, including local area information. However, they still find around 50 per cent of shortlisted bidders do not attend viewings and 50 per cent of viewers still refuse offers.

Another measure they have taken is that any home not allocated after two rounds of shortlisting is used as a "direct offer" to an applicant assessed as needing a direct offer. To support this and to ensure transparency and fairness in their use, Camden created a direct offers matrix and included it in the scheme. They have had some success with this approach as while they do still have some homes that take longer to allocate than they would like, they no longer have problems with homes being advertised and shortlisted multiple times.

Tips for others considering this approach

- Carefully consider whether the use of sanctions aligns with your local authority's allocation policy objectives. If choice forms a central element to ensuring people are living in homes they want to live in and therefore contributing to more balanced and sustainable communities, sanctions may undermine this.
- Consider other ways to reduce the amount of time it takes to allocate a home, including the use of direct offers. If you introduce direct offers, make sure you maintain the transparency of CBL by including your approach in your policy and publish details of lettings made as a result.
- Work closely with your housing association partners to explore ways to reduce void times that you all can agree on.

Stage 2) Priority

Definition of housing need

A common theme to emerge from our research is the use of flexibilities in the Localism Act 2011, by local authorities, to disqualify applicants they consider to be suitably housed or who have little or no housing need, i.e. those who do not fall within a reasonable preference category according to part 6 of the Housing Act 1996. The flexibilities allow authorities to ration the social housing in their areas, so it goes to those they determine need access the most.

This can have consequences for partnerships between councils and housing associations as it can reduce the number of potential applicants to consider for new lets, particularly where all or the majority of a housing association's homes are let to people via the statutory scheme. This concern was raised in responses to our sector survey and in all five of our workshop discussions, particularly relating to difficult-to-let homes or when nominated households were considered unsuitable for a tenancy.

"We have seen applicants with 'no identified housing need' fall in terms of housing priority, whether they have a local area connection or not, which has resulted in these individuals becoming at greater risk of homelessness and 'falling between the gaps' in the system."
(survey participant quote)

"The biggest problem is that the main focus of the Council is on people to whom it has a statutory duty. This means that e.g. households in private rented who are struggling to pay their rent are not generally admitted onto the Council's housing list until they are served a notice for rent arrears."
(survey participant quote)

"We will always let the majority of our homes through the LAs to those on housing waiting lists, but now the lists are more restrictive, we would also like to be able to access people who are still in housing need and on low incomes but for whatever reason have not or are not able to join the council waiting list."
(survey participant quote)

Conversely, local authorities recognise that housing associations are catering for a larger group of applicants, not just those in greatest housing need according to their priority framework.

"...they are not addressing the same level of need as our council supply."
(survey participant quote)

But this can have a negative impact on local authorities' ability to meet housing need - according to their statutory schemes - in their areas.

Responses to our sector survey and discussions in our workshops highlighted a concern by many housing associations that local authorities' schemes are not able to help many households they expect to be catering for. Many housing associations who took part in our research feel that housing need is being limited to too few household types under the statutory framework and that many others in housing need are failing to qualify because they do not have a need according to local authority criteria.

"There needs to be an increase in supply of social homes to make sure that it is available for a wider population. Currently there are a number of people on low incomes who are unable to afford any rents higher than social rents that cannot access social housing because they are not vulnerable in terms of support need." (survey respondent quote)



Sometimes it is the process itself though, that prevents people from accessing help in a timely manner. For example, application processes can be too long-winded, qualification and other restriction criteria can be too inflexible and fail to account for individual circumstances, activity of local authorities and housing associations can often take place in isolation from each other, potentially causing conflict and/or duplication.

This issue links with three other themes that emerged from our research, including;

1. **Affordability as a housing need** - affordability is not recognised as a specific housing need in the statutory framework for allocating social homes.
2. **Stigma** - how social housing is viewed by people who are not currently living in it and would potentially benefit from securing a home in the sector, but who will not apply due to stigma.
3. **Reaching other potential tenants** - the use of alternative platforms and models to advertise and let social housing.

1. Affordability as a housing need

The current statutory framework for determining priority does not specify that reasonable preference must be given to people who need social housing for affordability reasons. Instead, it states that local authorities are permitted to consider “the financial resources available to a person to meet his housing costs” when deciding how to prioritise people who fall within a reasonable preference category ([section 166A\(5\) Housing Act 1996](#)). This means it is for the local authority to decide how, if at all, to prioritise people whose only housing ‘need’ stems from their inability to afford a home to rent or buy in the private market.

Throughout our research, some local authorities highlighted how they use the flexibilities available to them to take someone’s financial circumstances into account. However, practice in this area

appears to focus more on limiting access or reducing priority if it is considered that someone has the financial resources available to meet their housing need in other ways. For example, if someone is an owner-occupier, or otherwise has equity in property, or if they have savings or income considered enough to meet housing costs in the commercial market.

We uncovered limited examples of practice that recognises affordability as a housing need and awards priority to reflect this, while at the same time our research highlights the need for affordability to be given more attention in the statutory framework.

Local authorities are required by the [Homelessness \(Suitability of Accommodation\) Order 1996](#), to take into account someone’s ability to afford their current accommodation when assessing whether someone is homeless. The statutory [homelessness code of guidance](#) for local authorities sets out how local authorities should approach this assessment:

“Housing authorities will need to consider whether the applicant can afford the housing costs without being deprived of basic essentials such as food, clothing, heating, transport and other essentials specific to their circumstances. Housing costs should not be regarded as affordable if the applicant would be left with a residual income that is insufficient to meet these essential needs”. (Paragraph 17.46)

The threshold for homelessness due to unaffordability requires someone to be without the means to meet their ‘essential needs’. Our research highlights that the current statutory housing need and homelessness framework fails to ensure adequate provision for people whose needs are not high enough to meet the statutory homelessness definition but whose needs are not being ‘adequately met by the commercial market’.

Affordability was mentioned as an issue for over half (55 per cent) of all respondents to our applicant survey.

“It’s depressing. Too few homes for people on low wages who just need stable housing.”
(applicant survey quote)

“If you work and have no health concerns you will be waiting forever to be rehoused”
(applicant survey quote)

2. Stigma

The focus on needs, that are often synonymous with vulnerability, is arguably contributing to a further residualisation of the sector, especially at the front end of the process, where applicants are asked to report their housing needs in order to access the list and be given enough priority to be housed as quickly as possible. Several survey respondents also highlighted how the statutory system can deter many people from applying for social housing – seeing this tenure type as ‘not for them’. This view was punctuated by a comment made by an applicant survey respondent who said:

“Everything is deficit based and judgemental - it’s as if the message is ‘What is wrong with you?’ If we judge you to be a sufficiently needy and useless victim then you might get to view a property, there is no sense the problem is a national lack of homes people can afford - people are instead made to feel they are the problem.” (applicant survey quote)

The issue was raised in all five workshops, so is not confined to areas of particularly high housing pressure. There were several reasons put forward as to why some people will not consider social housing as an option for them.

“the legal framework can lead people to think they are not vulnerable enough for social housing.” (Survey respondent quote)

“issues with descriptions of ‘need’ - everyone ‘needs’ a good home to live in but it now seems to mean vulnerabilities ..” (Twitter debate participant)

“one of the issues is that people think its ‘just for people on benefits”
(Twitter debate participant)

This effect is linked to the wider stigma debate, raised in our [Rethinking Social Housing](#) work and something identified as an area for further exploration in the government’s [2018 Social Housing Green Paper](#). It is entirely possible that the current nature of the allocation system further entrenches the stigmatisation of social housing and its tenants. As a result of increased rationing, intended to target homes at those whose needs are highest, housing need in the statutory sense is often evidenced by having circumstances and issues that are synonymous with vulnerability. Many workshop discussions explored how this focus can restrict efforts to achieve balanced and mixed communities.

“The legislative framework gives the message, that to be housed you must be vulnerable in some way - the application process and priority system supports this. This can lead to people thinking they are not vulnerable enough to access social housing.”
(Workshop participant quote)

3. Reaching other potential tenants

As a result of, or despite what many refer to as a ‘limited pool of potential tenants’, many landlords are using other ways to seek interest from people outside of the statutory scheme who would either not qualify to join the register, or who are unlikely to see social housing as an option for them.

One third (33 per cent) of respondents to our sector survey said they use social media or some other online platform to help with letting social housing. We explored this further in our workshops. Use of alternative advertising platforms does not necessarily mean that there are not people who need housing – there are, but many are disqualified, suspended, have support needs or cannot afford the rent, so are considered unsuitable, and those who are suitable do not always want the properties on offer.

Workshop discussions also highlighted related issues and challenges arising from restrictive and inflexible section 106 local connection requirements (discussed below in [Choice-based lettings systems](#)).



Recommendations for central government

- **Affordability should be included in the statutory reasonable preference groups.** Part 6 Housing Act 1996 determines 'need' for the purposes of prioritising between groups in an allocation scheme. High housing costs in the PRS are pushing more and more people into poverty but someone's ability to afford their current home or alternatives in the private/commercial market is not adequately addressed in the existing reasonable preference framework.

Unless a policy specifically states that it will consider this, it does not have to be considered, so there is a risk that these applicants will either be excluded based on having little or no identifiable housing need or fail to receive priority if they are permitted to join a scheme. But affordability of someone's current home and/or alternatives in the commercial market should be considered as part of an individual assessment for determining preference.

A useful definition can be derived from the Housing and Regeneration Act 2008 definition of social housing (for housing association regulation purposes) which states that social housing is 'low cost rental accommodation' that 'is made available in accordance with rules designed to ensure that it is made available to people whose needs are not adequately served by the commercial housing market'.

- **Government should consolidate a single code of guidance for local authorities on the allocation of social housing in England. An updated code should be made available online like the current homelessness code of guidance so it can be updated as a live document rather than introducing supplementary guidance.**

Recommendations for those involved in systems for accessing social homes

- **Local authorities should ensure applicants' unique circumstances and housing histories are considered when making decisions about whether someone can access a list and what priority they are given.**
- **Local authorities should review any restrictions that form part of their allocation schemes to assess their impact on those who may be in most need of social housing.**
- **Local authorities should have a rigorous process for assessing the impact of any new restrictions they consider introducing them.**
- **Local authorities should provide meaningful advice and options for people excluded or who face restrictions as part of their allocation processes.**

Stage 3) Getting the keys

Housing associations' lettings processes are not directly dictated by part 6 Housing Act 1996 requirements/flexibilities and can often act as the final stage through which applicants must go before an allocation can be made. Local authorities that own and manage their own homes (and so have lettings functions), will also have lettings processes, This is the pre-tenancy stage of the process.

Our research highlights a range of additional hurdles applicants can face when going through pre-tenancy processes but it also revealed ways to ensure they are people-led rather than process-led.

Pre-tenancy assessments

Our sector survey confirmed that the use of pre-tenancy assessments is now common practice and they explore a range of factors that inform a decision on whether to allocate a home, including:

- Risk assessment - informed by applicants' self-reporting and by other agencies working with the applicant, where sharing of information has been agreed.
- Financial/affordability assessment, including:
 - o Using credit check agencies
 - o Looking at income, expenditure and debts
 - o Ability to explore options in the private market
- Support and health needs - how this information is gathered is important. For example, applicants often self-report and information provided on a nomination is not always adequate.
- Housing needs/suitability, including social and cultural needs.



The ability of an applicant to afford a tenancy is included in the pre-tenancy assessments of 96 per cent of survey respondents and our workshops highlighted that affordability is a key indicator when deciding whether to allocate a tenancy. However, issues of unaffordability were predominantly related to Affordable Rent levels, mainly owned and managed by housing associations, being 'unaffordable' for many applicants. Local authority rent levels are more likely to be affordable, on average, than housing association levels ([MHCLG, 2019](#)).

Elements included in a pre-tenancy assessment:

- Ability to afford the tenancy - 96 per cent
- Identification of support needs - 87 per cent
- History of rent arrears - 87 per cent
- Ability to sustain a tenancy (other than affordability) - 85 per cent
- History of ASB - 84 per cent
- Ability to afford other housing options (e.g. ownership, private rent, shared ownership etc.) - 32 per cent



Approaches to Affordable Rent setting requires urgent reconsideration as it is often the case that levels are far from affordable for the people who need social housing. Our sector survey and workshops highlighted concerns over the impact of the increase in homes being let at Affordable Rent levels as opposed to the lower social rent. The overwhelming consensus in the workshop discussions was that Affordable Rents, are anything but affordable, especially in areas with higher housing costs.

"How can we be saying that affordable housing is not affordable for some?"

(Twitter debate participant)

"We need to stop kidding ourselves that Affordable Rent is affordable."

(workshop participant quote)

87 per cent of sector survey respondents use their pre-tenancy assessments to identify support needs. Exploring this further, workshop discussions highlighted that where support needs are identified providers want to know whether there is support in place, how long for and if the person is engaging with it. This includes internally or externally provided tenancy sustainment support, money advice, links with the local Citizens Advice Bureau, mental health agencies and floating support. Rejection due to unmet support needs is a growing issue and was raised in all workshops and in the sector survey.

"We are concerned that we are increasingly housing applicants with very serious support needs.....but these customers do not have any support provision in place."

(survey participant quote)

Many providers view unmet support needs as presenting too high a risk to tenancy sustainment and will often decide not to allocate tenancies for this reason. Participants told us that having strong floating support services available locally would make a difference but that opportunities to achieve this are restricted by the impact of local authority funding cuts. Workshop discussions revealed, however, that some areas have not

experienced the same level of cuts to support provision as others, due to local decision making and a corporate commitment to the value of retaining these types of services.

The consensus from our workshops was that pre-tenancy assessments should be a tool for supporting people into sustainable tenancies rather than a mechanism to avoid allocating homes to people who will find it most difficult to sustain a tenancy. And that local authorities, housing associations and their partners have a role to play in making sure support is available and provided to maximise tenancy success.

Some participants also highlighted how the drop in supported housing schemes available is affecting their ability meet some housing needs.

"The main issue we come across is the lack of supported housing units available to people with complex needs"

(survey participant quote)

The most alarming theme to emerge from our research is that it is often the people who need access to homes the most, and who are prioritised for housing based on this, who are facing the biggest barriers at the pre-tenancy assessment stage of the process.

It is therefore important to make sure pre-tenancy assessments take a people-led approach to enhancing access rather than a process driven approach that restricts it.

Making pre-tenancy assessments people-led

The underlying principles/aims of pre-tenancy assessments should be to make tenancies succeed, exploring options and not setting people up to fail - they should be about asking the right questions at the right time. They should prioritise the gathering of information to make a tenancy work for everyone rather than applying static rules to applicants via the assessment process.

Our workshop discussions highlighted that when an assessment takes place can make a difference because time is needed to work with people

who would face being rejected for tenancies and this can be a frustrating experience for applicants affected and delay the letting process for landlords. We found that there are three main stages when assessments take place, including:

1. At the application stage (a kind of pre-assessment):
 - To gather enough information to signpost and refer to support services and/or provide an online course.
 - Risk assessments can be done at application stage too.
 - Advice can be provided to help with getting furniture etc.
 - Where someone has been identified as needing help to increase tenancy success, providing support and advice plans and referring to other agencies can help applicants understand what progress needs to be made to help them secure a tenancy.
2. When someone is flagged up as being 'close to offer stage'. For example, when applicants start appearing in the top 10-20 households when shortlisting takes place.
3. A face to face pre-tenancy meeting at offer stage will either be the only time someone's circumstances are assessed, or it can top up information already collected and help set up ongoing support to enhance tenancy success, whether provided internally or in partnership with local agencies.

One of the most important questions we asked at our workshops explored what happens to applicants they decide are not suitable for tenancies. Many workshop participants - both local authorities and housing associations - told us that they take an 'it's not never, just not now' approach to these decisions, but few were able to explain how affected applicants were advised or informed of what could be done to improve their chances next time. Some providers did say that they work with applicants to help them become tenancy ready.

Our survey and workshops highlighted the many ways local authorities and housing associations can work with applicants to support access:

- Referring to relevant advice and support
- Having an adequate supply of supported accommodation
- Providing taster/training flats or shared tenancies for people with limited experience of managing a tenancy
- Setting a review period alongside a plan
- Offering starter/introductory tenancies
- Exploring use of acceptable behaviour contracts
- Conducting settling in visits
- Providing tenancy/floating support
- Offering tenancy training (can be delivered in a range of ways include online or face to face)
- Flagging relevant tenants up to tenancy management teams, and tenancy officers can do sign-ups to build relationships rather than lettings officers

Many local authorities complete some form of assessment at the application stage, but another assessment is required at the point of offer because circumstances can change in the interim period. This can lead to duplication across local authorities and housing associations which can frustrate customers and is inefficient use of officers' time.

Workshop participants told us that pre-tenancy assessments can lead to applicants 'de-selecting themselves' for a property once they understand what is required and have considered their positions. We do not have sufficient data to adequately understand the practice of 'refusals' and/or 'de-selections' and this detail was outside of the scope of the research, but due to its importance we recommend that further research is needed to develop our understanding on the topic.

"Wraparound support can increase the likelihood of tenancy success, but this needs to be supported by a culture that recognises that just because someone has been bad in the past, it doesn't mean they are always going to be bad." (workshop participant quote).



What others are doing

Hull City Council

Hull City Council introduced pre tenancy affordability assessments in 2018 in response to the need to identify, as early as possible, prospective tenants that are likely to struggle to sustain their tenancies and ensure that they have access to appropriate advice and support. This could be via a referral on to their in-house tenancy sustainment officers, their UC specialist team or an external agency (e.g. CAB for debt advice).

Since 2012 Hull's customers have faced increasingly difficult financial situations due to welfare reforms. Around 3000 customers have experienced a deduction to their help with housing costs due to the bedroom tax, several hundred are subject the benefit cap and those in work are often in precarious employment. In a minority of cases, this meant that council tenancies had become unaffordable, particularly to single under 35s seeking self-contained accommodation.

Hull's previous allocations policy did not enable them to withdraw an offer of accommodation to an applicant due to affordability - even in circumstances where they clearly did not have the means to pay their rent and household costs. This had led to some people being housed into unsustainable situations, with resultant tenancy failure.

Over the last three years, they improved their tenancy sustainment offer through the introduction of a dedicated team and more recently, a UC support team. They recognised that early intervention is key to sustaining tenancies and reducing churn. The introduction of the tenancy affordability assessment was designed to support their sustainment strategy and was one element in a range of allocations policy changes agreed by Cabinet in early 2018.

As part of this approach they developed a policy and procedures to guide staff and to agree a method to collect, store and analyse the outcomes of assessments. Their approach makes use of the 'Entitled to' suite of online benefit and budgeting calculators that they work with alongside their bespoke tenancy affordability calculator. The assessments flag applicants' affordability (the measure of which is quite low), as either;

- Green - the tenancy is affordable and there are no concerns
- Amber - there are areas the applicant may need support with to ensure the tenancy is, or will remain, affordable
- Red - based on the applicant's current financial circumstances, the tenancy is not affordable

Hull have put in place safeguards to ensure that applicants who are flagged as red are signposted for further assistance and offers cannot be withdrawn in these circumstances unless approved by their head of service. Where a statutory housing duty is owed or in urgent situations, they will rehouse people whose assessment outcome is 'red' and refer, where people agree, to their tenancy sustainment team to ensure they have the best opportunity for their tenancy to succeed.

To date, they have not withdrawn any offers of accommodation based on the outcome of an affordability assessment. They have found, in most circumstances, there is something that can be done to improve the applicant's financial position, or the applicant themselves will decide to look at other housing options once they understand the full costs associated with the prospective tenancy.

Tip for others considering the same approach

Have a clear objective to use pre-tenancy assessments as an opportunity to identify issues that some applicants may face in relation to their ability to sustain a tenancy, therefore allowing earlier intervention to prevent problems escalating.

What others are doing

Your Homes Newcastle (YHN)

YHN are an arm's length management organisation (ALMO) responsible for managing Newcastle City Council's homes. YHN is a partner of Tyne and Wear Homes CBL scheme, which operates across the North East of England.

YHN has several projects specifically aimed at making accessing social housing easier for vulnerable groups, including a support and progression team including:

- A dedicated pathways team that assists people with support needs to access suitable accommodation and live independent and successful lives by work specifically with;
 - people who are moving on from temporary and supported accommodation,
 - people who are fleeing domestic violence and need rehousing due to this
 - people who are unable to return home after a stay in hospital
 - people who are in need of suitable housing either following a stay in hospital due to mental health difficulties, or because their current accommodation is unsuitable
 - people moving into general needs tenancies after being in the armed forces
 - refugees who have recently received their status and who have to leave NAS accommodation
- An OSIC Level 1 certified member of staff to support EEA nationals who are applying to YHN to establish a legal status and improve access to social housing in the future.
- Young people's support and progression workers who support care leavers into their own tenancies. The progression workers are qualified social workers and they also work with young people who are identified as children in need (section 17 of the Children Act 1989) to support them into suitable homes or to remain at home, where it is safe to do so.
- A system that flags up where an applicant reports having a support need which leads to contact being made to complete a pre-tenancy risk assessment. This assessment is used to facilitate a discussion about possible barriers to a successful tenancy. The aim is to recommend appropriate support an applicant may need at the point of sign up (or before) to help them sustain a tenancy.
- Qualified social workers who support unaccompanied minors to live in general needs housing stock.

YHN focuses on building resilience among their customer base by supporting them to sustain their tenancies and engage within their community. They want to support access to social housing for the tenants that need it most by engaging with applicants at the allocation stage and ensuring they get the help they need. YHN's tenancy turnover is 8.2 per cent which is significantly lower than any other social landlord within their benchmarking group.

Tips for others considering the same approach

- It helps to have passionate staff who believe in the approach being taken and who have the right skills and behaviours to deliver services with compassion and understanding. Advocating on behalf of customer and challenging policy/procedure where it creates barriers for people is an important part of delivering services in this way.
- Work in partnership with local support providers to ensure that applicants with support needs are identified as early in the process as possible
- Develop wider teams' understanding about the issues affecting applicants and tenants which may make sustaining a tenancy challenging.
- Make sure services are accessible. Adopting a 'digital by choice' agenda will still allow for face to face options, home visits and office appointments for people who need them
- Adopt a management culture where staff judgements about allocations and assessments are trusted, so staff are empowered to support tenants and applicants with a person-centred approach and not 'one size fits all'.



Pre-tenancy or tenancy-ready training

Many housing associations, local authorities and other agencies provide some form of pre-tenancy training or tenancy-ready training to support sustainable tenancies.

Almost one third (27 per cent) of all sector survey respondents said there are circumstances where an applicant would be required to have completed some form of tenancy-ready course before they can sign for a tenancy. Training requirements appear to fall into two broad categories:

1. Mandatory/conditional

- Pre-tenancy 'training' that all potential new tenants must complete before they can be allocated a tenancy
- Requirements for specific groups as part of a formal process for move-on or resettlement (supported accommodation or care leavers for example)
- Requirements for specific groups considered most likely to find it difficult to sustain a tenancy (young people, people taking on their first tenancy, people with a history of ASB or arrears, new UC claimants for example)
- Requirements for applicants being offered a tenancy on a particular development or estate

2. Optional

- Offering extra priority for certain groups (young people for example) who have completed a tenancy-ready course
- Offering as a benefit for certain groups including care leavers and people living in temporary accommodation

It was raised in more than one workshop that the sector is arguably better at working with the PRS to sustain tenancies and monitor outcomes. Evaluating the effect of tenancy-ready training on tenancy sustainment is important and there was an acceptance that whilst monitoring is done for PRS tenancies, social housing tenancies should also be tracked for success.



What others are doing

Coastline Housing Ltd

Coastline Housing Ltd is a housing operating in the South West of England. In partnership with Cornwall College, Coastline delivers an accredited tenancy management course designed for people who have limited experience of independent living. The aim is to support them to develop tenancy management skills and demonstrate their ability to find and keep a future home.

The course is entitled TRIGVA which is Cornish for home/abode and incorporates the following topics:

- Understand how to apply for housing
- Planning a move into a new Home
- Preparing to be a Good tenant and neighbour
- Understand how to look after a new home
- Understand financial products and services

Coastline's objective is to equip future and current customers with the skills/knowledge they need to sustain a tenancy long term. Coastline initially ran the course in 2017, solely for customers accessing Coastline's Homeless Services. The results of which were positive, with 7 out of the 10 attendees going on to obtain tenancies which they still maintain today. Following this success, the course has been made available to a more diverse range of customers including:

- First time renters with no history of tenancy management
- People who are assessed as unsuitable for a tenancy during their pre-tenancy interview
- People who are recommended via the local authority housing options process
- People who have experienced homelessness or unsettled accommodation

Coastline are continuing to develop this scheme by exploring ways increase attendance, including the potential to work in partnership with their local authority partners at Cornwall Council to look at

the possibility of increasing someone's housing register priority upon completion of the course. They are also considering alternative delivery options to help overcome barriers to attending such as child care, work commitments and transport.

Tips for other wishing to take the same approach

- Consider which team is best placed to take responsibility for managing the planning and promotion of, and recruitment to, the course
- Be mindful that the classroom environment may be a deterrent to attendance – could it be delivered in a community setting locally?
- Ensure that each module is individually attended, so that customers can be awarded certificates for elements that they attend without having to attend the whole week. This has been beneficial, as some customers would perhaps disengage if encouraged to attend elements that are not relevant to them (e.g. 'How to be a good neighbour', if they've never had issues with ASB)
- Consider what the appeal for engagement is: does it increase the likelihood of securing a tenancy? Are there other incentives?
- Consider customer consultation to promote co-creation and increase interest in engagement
- Consider barriers to attendance such as childcare and transport
- Ensure that delivery partners can provide Learning Support Assistants, to increase inclusivity
- Consider delivery in conjunction with other Housing Associations, to increase both reach and partnership working
- Work in partnership with the training provider to ensure that content meets organisational requirements and that the tone/level of delivery meets customer requirements



What others are doing

Accent Housing

Accent Housing are a member of the [Homes for Cathy](#) group of housing associations that are committed to raising awareness of the needs of homeless people and working on strategies to end homelessness. Homes for Cathy worked in partnership with Crisis, as part of their [Plan to end homelessness in Great Britain](#), to form [nine commitments](#) for members to sign up to that offer associations tools to shape policies and practices that are geared towards tackling homelessness.

In partnership with Surrey Heath Borough Council, Accent are piloting Crisis' [Renting Ready tenancy training course](#), with the aim of improving housing options for people who have previously faced exclusions or restrictions due to past conduct (e.g. rent arrears or ASB) and for people who have low priority via statutory the allocation scheme. These groups face particular barriers when trying to secure a home in both the private and social rented sectors.

The course material is set out in Crisis' Renting Ready training package and is delivered by two members of staff (one from Accent and one from their partner agency the Hope Hub) trained by a Crisis Housing Trainer. The course covers a range of areas, including:

- Understanding the different types of tenancy in the private and social rented sectors and their key differences
- What to consider when selecting a suitable property, including how to find out about local services
- Understanding what it means to be a good tenant, including tenants and landlord responsibilities
- Understanding the key financial aspect of managing a tenancy and how best to manage money
- Knowing about utilities, including how to find the best deal and save money

The original Renting Ready package focuses on becoming a tenant in the private rented sector, so Accent worked with Crisis to cover the social rented sector. By including both tenures Accent can enhance attendees' housing options as part of a broader approach to tackling homelessness in the Surrey Heath area, rather than just focusing on the sustainability of Accent tenancies alone. It also helps manage applicants' expectations and encourage them to consider all housing options available to them.

The course helps attendees access homes because landlords are more confident that those who have attended understand how to manage their tenancy successfully. Surrey Heath Borough Council does not enhance applicants' priority if they have completed the course, but they have better success helping people find a home in the PRS, if that is suitable, and with Accent, who are the largest provider of social housing in the area.

Tips for others considering the same approach

- Be clear on what your main objective is. Accent were very clear that they wanted to offer the training to all social housing applicants and not just those who would end up being housed by them. Their focus was to contribute to a wider commitment to improving housing options and tackling homelessness rather than just concentrating on the sustainability of their own tenancies, although this is a positive by-product of the scheme.
- Think about where referrals will come from. Accent work closely with the Hope Hub, a local charity that works to prevent and end homelessness, who refers a lot of single lower priority people they come into contact with. However, Accent find it more difficult to reach out to people who face exclusions or restriction because they rarely find out about them until they are nominated and face being rejected. Working in partnership with the local authority allocation scheme may help identify potential referrals on a pro-active way.

- Think carefully about the environment in which the course is delivered and the method of delivery. Accent have an impressive 100 per cent retention rate which means anyone who starts their course remains until the end. This is because they have carefully considered how best to deliver the four-day course in a way that suits a range of learners, some of whom may not feel comfortable in a traditional learning environment. Some people also find it more difficult to maintain concentration than others. Keeping it as informal as possible and considering individual learners' needs are both important to making this work.
- Consider how to overcome barriers to attendance. Accent finds that it can be a challenge to encourage people to attend but they have identified several barriers including child care and employment. It can be particularly difficult to find ways for people in full time work to take the time needed to complete the course but for those with child care responsibilities Surrey Heath Borough Council have committed to covering Creche fees where this will enable someone to attend. Offering incentives can help increase attendance e.g. enhancing priority via the allocation scheme. This is being explored as part of Surrey Heath BC's review of their allocation scheme.

What others are doing

Newcastle City Council (NCC)

Newcastle City Council has a supported housing panel whose membership includes representatives from their allocation team, health and wellbeing, landlords and their strategic housing service. The panel has adopted a "no person is lost" policy, which means that any person referred to the panel who cannot be placed into an existing supported scheme, for whatever reason, is supported to find alternative accommodation. This is usually in the form of a bid via their CBL scheme, a direct letting of a general needs social home, a tenancy in accredited PRS accommodation or alternative specialised accommodation. The panel has a direct reporting link to the council's specialised housing programme board, which ensures that gaps in service provision and customer experience are relayed to strategic decision makers, in real time.

The panel has enabled the successful rehousing of many applicants by offering tenancies in new build and existing housing schemes, direct letting of social housing (local authority or housing association) or arranging tenancies for accredited PRS accommodation. This approach allows NCC to ensure that, wherever possible, people with support needs do not fall between the gaps or get passed from one organisation to another. The panel has also had a direct impact on meeting gaps in housing and care provision through its direct reporting function to the specialised housing programme board.

Tip for others considering the same approach

Make sure your panel has a strong understanding of its agreed shared objectives. It is important to invest the time, effort and resource in building strong and effective relationships and a common understanding between the health and wellbeing services, allocation service, landlords and care providers that will ensure everyone works to the same objectives and has ownership of the panel.



Rent in advance

Asking for some kind of payment of rent in advance is common practice - 66 per cent of survey respondents say they require applicants to pay rent in advance before they can sign for a tenancy. However, the extent to which this is a 'requirement' varies. Some housing providers stipulate that a payment in advance must be made before a tenancy can begin, regardless of the applicant's circumstances. These providers argue that insisting on rent in advance helps instil a rent payment culture, but others raised concerns about the inflexibility of this position. Insisting on rent in advance fails to recognise that certain groups will find it particularly challenging to afford it, including people who:

- have been homeless
- are starting their first tenancy e.g. care leavers, young people, recently accepted refugees
- are fleeing domestic abuse
- are on lower incomes or claiming benefits to help with housing costs

Rent in advance can mean new tenants have little or no money to pay for essential items like furniture, white goods and cooking/eating utensils - driving tenants to borrow money from friends, family and even unaffordable loan providers. This can drive new tenants into financial difficulty from the beginning of their tenancy, increasing the likelihood of getting into rent arrears and facing eviction.

Other providers ask for rent in advance but are flexible to the circumstances of certain groups or make decisions on an individual basis. The amount of rent in advance they will ask for will vary, ranging from one week to one month's rent and may depend on the frequency with which a new tenant says they will pay their rent e.g. if someone says they will pay weekly, they will be asked to pay one week in advance.

Our workshops and sector survey revealed an emerging practice of insisting on DHP or homelessness prevention fund payments to cover rent in advance for all cases where there are affordability issues. Workshop discussions questioned whether this was the most appropriate use of these limited funds but it was recognised that there may be cases where a DHP or a homelessness prevention fund payment is the only suitable solution.

There are ways for landlords to seek payments of rent in advance while also allowing flexibility on a case by case basis:

- o The application stage presents an ideal opportunity to inform people that they may wish to start saving in order to pay their rent in advance, rather than waiting until an offer. An allocation system should fully inform all applicants about payments in advance and how to access support or advice if they think this will be a challenge, or impossible. This can be included in the general information for applicants and then detailed in each advert e.g. 'this property requires rent in advance of £x, please speak with x agency/person if you will have trouble making this payment'.
- o Not requiring rent in advance at all for people in receipt of help with their housing costs, recognising that they are paid their money in arrears.
- o Agreeing an affordable amount for tenants to pay over a period of time, so that their rent account ends up in advance.
- o Consider, on a case by case basis, if applying for a DHP or help via the homelessness prevention fund would be a suitable option to explore.

- o If someone is in receipt of universal credit, having conversations about how that process works, where to access support to navigate the process and how to ensure rent payments are made, and how much they are (people in low paid jobs with flexible hours will find that help with housing costs varies so claimants need to know that this is how the process works).

Recommendation for central government

- **Government should work with local authorities and housing associations to develop a toolkit that supports the delivery of pre-tenancy processes that prioritise supporting people into sustainable tenancies rather than informing decisions about whether to allocate the tenancy.**

Recommendation for those involved in systems for accessing social homes

- **Local authorities and housing associations should adopt pre-tenancy processes that prioritise supporting people into sustainable tenancies rather than informing decisions about whether to allocate the tenancy. This can be achieved by working together to develop consistent processes that include locally agreed criteria, procedures and thresholds for what should be included in, and action taken from, pre-tenancy assessments.**





Choice-based lettings systems

The choice-based lettings (CBL) model remains the most commonly used system for allocating social housing but whether it remains the right model in the current environment will depend on a range of important influencing factors.

There is a range of allocation systems or models that local authorities and housing associations can use to allocate social housing, but our research highlights that CBL remains the most commonly used system, with 76 per cent of all sector survey respondents using the model. This is unsurprising as the then Office of the Deputy Prime Minister expected all local housing authorities to have some form of CBL scheme in place by 2010 (ODPM, 2005).

Our adoption of the model came largely from lessons taken from the original Delft or

‘advertising’ model taken from the Netherlands in the late 1990s. Providing applicants with an element of choice in where they live is central to the CBL model ([Brown et al, 2003](#)). From the perspective of UK policy makers, the model’s transparency was an attractive concept ([Galbraith, 2017](#)) but it is not surprising that the real level of choice is constrained in areas where there is a shortage of social housing stock ([Brown et al, 2003](#)).

There were many comments provided about CBL in responses to our sector survey, both positive and negative. Our workshops explored these views in more detail, and they revealed that many of the negative views could be address by changing the way CBL is delivered rather than there being a fundamental issue with the model.

Positives of CBL	Negatives of CBL
<ul style="list-style-type: none"> • CBL can act as a single access point to all landlords • There is more transparency with CBL from a customer perspective • CBL means staff can focus more time on allocating and letting properties than dealing with people’s queries about their applications • CBL can help identify areas of low demand and therefore help with strategic decision-making around stock e.g. rationalisation, regeneration, standards, planning/development 	<ul style="list-style-type: none"> • The application process can be long-winded • IT issues can restrict the model’s potential • Illusion of choice - linked to supply issues and consequences of not actively bidding • From a housing provider’s perspective, costs are not always transparent • It can be difficult to balance the needs of landlords who operate across many areas, often with different policies • Pre-tenancy processes can be frustrating as they happen once someone has been matched to a property they have bid for • Adverts are often of poor quality

Our current housing crisis presents many more challenges than when CBL was first rolled out, so it is understandable to question whether the model continues to work in the current environment. Exploring this further, discussions at our workshops suggested that the model remains relevant and fit for purpose in many parts of the country, but there are some important influencing elements, including:

1. **Offering 'choice' in the local context** - the extent to which CBL can offer genuine choice is influenced by demand and supply in any given area, including housing costs, geographical location, e.g. rural areas, and how much social housing there is. Local context needs to be carefully considered when deciding how to make use of direct offers/lettings and whether to apply sanctions linked to bidding behaviour and/or refusal of offers.
2. **Information and advice** - the level and quality of information available for applicants can help manage expectations, which can be particularly challenging in areas of high demand versus limited supply. The level of information and advice also helps to maximise the transparency of the CBL model.
3. **Low demand** - the quality and types of accommodation on offer can lead to issues with low demand. The impact of the bedroom tax means that many homes cannot be let to households who need them without accepting a shortfall in help towards housing costs and many providers have changed their policies so they cannot allocate where someone would be under-occupying. How homes are advertised is closely linked to the issue of low demand and there may be lessons to learn from how the private rented sector approaches the marketing of its properties, including more positive language about what the 'offer' is, attractive pictures attractive pictures, for example.
4. **Reliable and flexible technology** - the potential of the CBL model depends largely on how much providers are willing to invest in technology that reflects what customers expect from modern online service provision.

5. **Partnership working** - relationships are important to ensure local authorities' and housing associations' priorities are as balanced as possible. Having a relevant forum for discussion, debate and exploration of emerging issues can help support effective relationships in a CBL scheme.

1. Offering 'choice' in the local context

It is accepted that CBL can be better, but its potential is restricted by external factors of supply and demand. There are regional differences in how CBL can meet need in higher and lower housing costs areas of the country. For example, there are still PRS properties in the North that are within LHA rates, which means people who cannot access social housing can still find a home in those areas. Where this is not the case, applicants on lower incomes and/or with support needs, for whom the PRS is not a suitable option, are competing for a declining proportion of social homes.

In areas of higher housing pressure, a lack of social housing can limit the potential for CBL to offer genuine choice. Choice may no longer be the right term to use but the original Delft principles of transparency in the lettings process for customers remains relevant.

'CBL has stayed the same while everything else has changed' (*workshop participant quote*).

It is important that CBL schemes take local context into account when organisations are making decisions about how to develop policy and practice to deliver their allocation schemes. For example, in areas of high demand but limited supply, many applicants are unable to exercise choice if their needs are so urgent, they feel compelled to bid for whatever will get them housed the quickest.

Applying sanctions to someone for not 'actively' bidding or refusing 'reasonable' offers would also conflict with the idea of choice in a CBL scheme, especially if both criteria can apply within the same policy. This means that applicants can end up bidding on something they would not



necessarily choose, to avoid being penalised. But then, if they are offered one of the properties bid on for this reason, they face being penalised for refusing it. Applicants need to know what how sanctions are applied, what level of discretion is available so they can make fully informed decisions about their applications. A more people-focused system could involve flagging up those who have not bid for a time and checking if that person is still in need or if their circumstances have changed rather than automatically applying sanctions based on pre-determined criteria.

Workshop discussions also revealed how being able to make use of direct offers within a CBL system is considered an important flexibility, because authorities can offer a property directly to someone in urgent housing need, who is registered via the scheme, without advertising it.

There are concerns, however, that the transparency of the model can be undermined by the use of direct offers/lets, although this can arguably be overcome by publishing information about lettings made in this way. It is important for local authorities to be mindful that any element of 'choice' is removed where offers of direct lettings are made, and refusal can have negative consequences for some groups of applicants in particular e.g. homeless households.

2. Information and advice

The transparency of CBL is one of the main positives of the model and our workshop discussions highlighted that other models cannot provide this unless people ask for information or ask questions. The model's transparency arguably overrides any perceived negative aspects providers shared.

Pre-CBL more time was spent explaining why people were not being housed but that information can be provided in a CBL system which lowers applicant queries, freeing up staff time to focus on applications, allocations and lettings.

One of the strongest messages that came through about CBL from all regional workshops and featured prominently in survey responses, was the need to ensure systems provide applicants with enough information that is easy to access and understand, that both manages expectations and helps them make informed choices.

Delivering allocations as part of a wider approach would be more than advertising and letting properties. Providing information would ideally be supported by a wider housing options approach that informs applicants about all their housing options based on information they have provided, including how to access help to explore these options. The statutory guidance encourages authorities "to adopt a housing options approach as part of a move to a managed waiting list" and that this approach can have "several benefits: people are offered support to access the housing solution which best meets their needs (which might be private rented housing, low cost home ownership or help to stay put); expectations about accessing social housing are properly managed; and social housing is focused on those who need it most" ([DCLG, 2012, paragraph 3.19](#)).

Many workshop participants pointed to the housing needs assessments and personalised housing plans used as part of the [Homelessness Reduction Act 2017](#) framework, as a positive example of taking a truly people-focused approach to assessing someone's need for housing and ensuring they receive adequate support to secure the most suitable option for them.

Top tips for providing information

- Let applicants know as much detail about the property they are bidding on as possible. It can help reduce refusal rates and vacancy periods and can also improve partners' experiences of the system.
- It is important to keep it simple and be clear and honest about the extent to which someone can be helped.
- It will help to ensure there is consistent training and advice across all partner organisations relating to shared schemes, so all applicants are given the same information about what to expect and how to navigate the system.
- Information must be accurate, easy to access and understand.
- Incorporate ways to identify and communicate with applicants who may need support to interpret/understand information and/or manage the application and bidding processes.
- Pre-tenancy assessments can cause frustration and lead to negative customer experiences. Providing information about these assessments, including what is considered and any criteria that would make a potential tenant unsuitable, can help reduce this frustration and help applicants make an informed decision about whether to place a bid.
- Information about policies should be clear, including how to challenge decisions.

Ways to provide information and advice

- An online video and/or series of 'factsheets' that are integrated into the CBL application system but is always available for applicants to access whenever they would like to but as soon in the application process as possible, at the earliest
- Working with other organisations, including councillors and MPs to ensure advice is available and that it's consistent in messaging
- Having an IT system that tailors information to the applicant's needs and previous bidding history
- Face-to-face or one to one contact when/as required
- Incorporating allocations into a housing options approach and using PHPs explain this to inform decision on applications
- A digital platform that does not exclude those who cannot use, or who find it more difficult to use online services



What others are doing

Crisis Skylight Merseyside

The Crisis Skylight Merseyside housing team offers one-to-one support to help members access housing across Liverpool City Region, whether through a housing association or private rented accommodation. They also offer specialist tenancy skills training Renting Ready to prepare members for taking on their tenancy. In February 2019, they launched a housing drop in for Crisis members as part of their housing offer.

Each housing drop in provides a range of services including, weekly property searching sessions and access to computers to search for both private rented accommodation and social housing. Staff are on hand to guide people through the process and they specifically focus on ensuring individuals eligible to use Property Pool Plus (the local Choice Based Lettings scheme for Liverpool, Sefton, Halton, Knowsley and Wirral):

- Are supported to understand what social housing is and get help to make an application
- Understand what their priority banding means and how to place a bid
- Help to resolve any issues that may come up or impact on their ability to progress with bidding including, understanding how to make or withdraw a bid for a property, loss of log in details or updating personal information

Sessions are advertised in their timetable and are accessible to anyone that is eligible for Crisis support. If members wish to look for private rented accommodation, they can be signposted to relevant property searching websites and local housing allowance rates to search for affordable accommodation. They also offer support with contacting landlords and discuss how to prepare for viewings. Crisis Members who have attended their tenancy skills classes, Renting Ready, are also signposted to attend as part of their onward progression.

Crisis Skylight Merseyside decided to develop these sessions in response to the following key issues:

- Introducing a drop in meant that members could access specialist help on a weekly basis rather than waiting perhaps two or three weeks for their one-to-one appointment with a coach and offered the opportunity for those with less intensive needs to have access to light touch support from the service
- There was a gap in provision for individuals who are not accessing resettlement support via hostels, e.g. those who are sofa surfing because of a wait for hostel accommodation or those who do not wish to access hostel accommodation
- There were people not registered via the choice-based lettings scheme but who would be eligible to do so and those who were unsure how to bid or who needed additional support to be able to bid and navigate the system
- Members not having regular access to computers or smart phones with data for property searching.

Tips for other considering the same approach

- Time drop in sessions to coincide with the release of properties via the CBL scheme website and so that service users have plenty of time to review their bids later in the week before the bidding cycle closes
- Ensure drop in provisions enable referrals and signposting to services that can support people with more complex issues if they arise

What others are doing

Kirklees Council

Kirklees Council has been successful in a bid to the MHCLG's PRS Access Fund of £120,000 to enable single people to access suitable private rented sector accommodation, and to successfully maintain their tenancy through the provision of "light touch" support. The service, Tenant Finder+, aims to ensure that tenancies are successfully sustained for a minimum period of 12 months.

The Tenant Finder + scheme fills a gap in provision for low support needs homeless households for whom an appropriate service does not currently exist. There has been extensive research undertaken into the local PRS market, including as part of the Council's Strategic Housing Market Assessment. The service is provided to single people over the age of 18 who have a housing need and to whom the council would owe a prevention or relief duty under the Housing Act 1996 (As amended by the Homelessness Reduction Act 2017), and who do not meet the threshold for requiring supported housing or intensive floating support.

Tenancy Finder+, delivers a resettlement support package for every individual who enters the service. These support packages aim to ensure that tenancies are sustained, and tenants are

enabled to develop/maintain the skills needed to live independently, manage their money well and wherever possible, find and sustain employment (or some other meaningful activity).

The service is delivered on a payment-by-results basis by Fusion Housing, who are a non-profit making charity providing housing support and advice. The key focus is on the outcomes to be achieved, and payment will be triggered once a satisfactory outcome can be evidenced. This approach can encourage more proactive and innovative ways of engaging with people whose behaviour may be considered as challenging or who may be reluctant to engage. It also ensures that outcomes achieved are more sustainable and meaningful.

Tip for others considering the same approach

- Having an existing partner in place who can deliver the scheme will strengthen any bid for this type of funding. Kirklees Council's partner had already delivered a successful payment-by-results programmes through the Fair Chance funding scheme, so they were well placed to evidence how they could deliver results through the PRS Access Fund. In addition, Fusion Housing already had strong relationships with local landlords which enhanced confidence in them being able to deliver this programme.

What others are doing

Leicester City Council

Leicester City Council produced a document, 'Who Gets Social Housing?', which gives demand and letting information for people on their housing register. The document aims to manage applicants' expectations by giving meaningful information regarding average waiting times for housing in different parts of the city based on a person's banding priority and size of accommodation needed. It helps to reduce the number of applicant enquiries asking why they have not been housed yet. The information enables applicants to make more

informed choices about their application and can encourage them to consider their wider housing options, including the private rented sector.

Leicester City Council uses data sourced from their housing register to inform the documents. They continue to develop the information included and are exploring how to incorporate data that would be helpful for people needing adapted accommodation.

Tips for other considering the same approach

- It's important to produce and display the information in a format that applicants can easily understand and interpret



3. Reliable and flexible technology

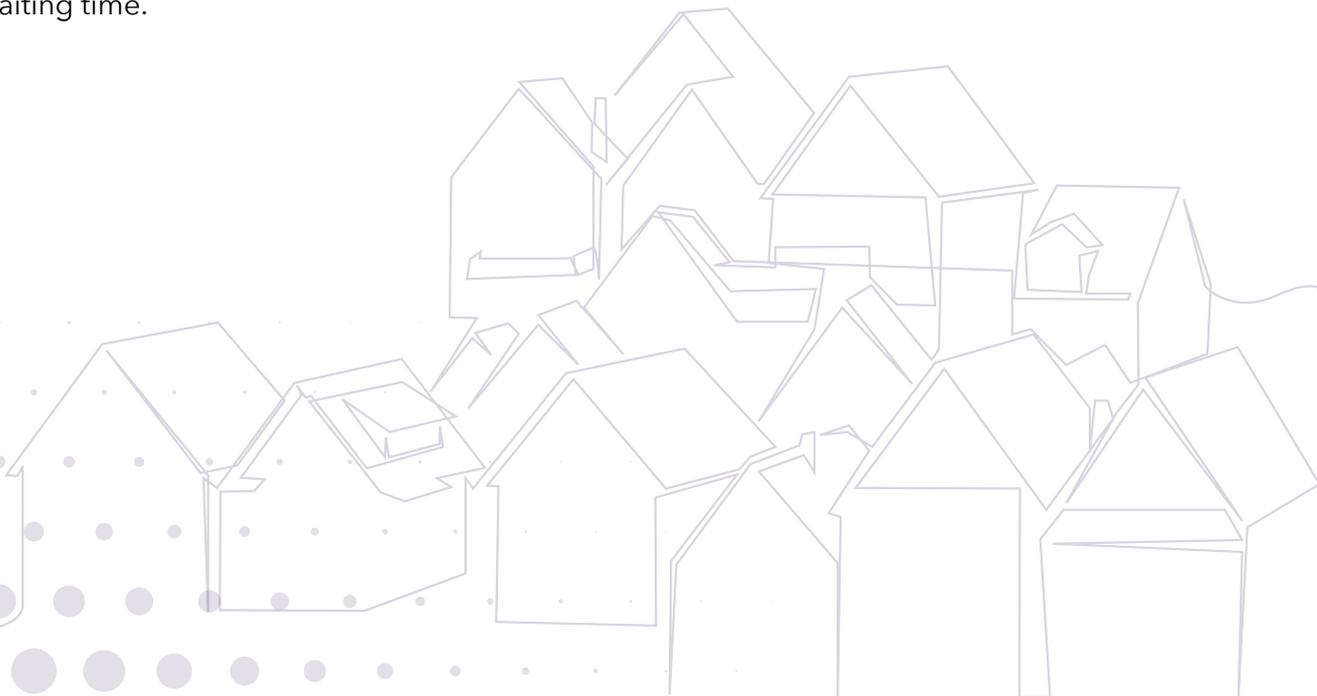
Comments received via our online sector and applicant surveys and discussions in our workshops highlighted how having reliable and flexible IT systems can improve the CBL experience for partners and applicants.

In order to achieve this, local authorities and their partners must first explore how sophisticated their IT systems are and understand what they are capable of. For example, the possibility of tailoring information to individual applicants, 'Amazon-style', was raised at several workshops. This approach would see applicants receiving pop-up notifications letting them know if a property, based on their bidding history, is available and what position they would be in if they placed a bid at that time. Information could also inform them how long people in similar circumstances and who were considering similar property types (including locations), have typically waited before being housed, based on historic lettings data. This way, applicants are given enough information to make decision about their application or whether to explore alternative options. When providing this level of information, it is important to highlight that demand and supply changes all the time and that the data provided is an indication only and not a guaranteed waiting time.

There is a general sense that allocation systems need to become more digitally progressive - many workshop participants highlighted that their CBL system is the same one they used when the policy was first introduced over a decade ago. Technology has progressed immensely in this time but many providers' CBL systems have not kept pace at all. One sector survey respondent is no longer using CBL, saying 'it was designed before progress in Internet/IT but technology for CBL hasn't progressed or modernised alongside this'.

Delivering online services, particularly those that allow applicants to self-serve, can improve accessibility but it is important that safeguards are in place for those who need support to access and use online platforms. Linking with digital inclusion activity and initiatives can help achieve this.

Housing associations that operate across several areas can find the varying IT systems and advertising/allocation criteria difficult to square with their priorities as a landlord. There is no consistent IT system being used and advertising cycles/number of bids per applicants vary considerably.



What others are doing

Kent Homechoice: Providing digital support for housing and homelessness (LGA, 2018)

Kent Homechoice is a CBL partnership of local authorities and housing associations that provide social housing across Kent and Medway. As part of their LGA-funded digital transformation programme Kent Homechoice developed and implemented the following online tools, which are also available in mobile-friendly versions:

1. A homelessness triage service that informs them if someone needs a statutory assessment and offers information about available advice and support
2. A pre-assessment form generates a provisional outcome of applying to join the housing register and offers customers an action plan to explore all their local housing options
3. A redesigned housing application form which is 'a scaled-down and simplified version' of the previous one. The form pulls information already provided at the pre-assessment stage and only asks questions that are relevant to each application.

Kent Homechoice have seen important benefits from introducing these tools, including;

- Financial savings resulting from reduced time processing housing applications and a reduction in face-to-face visits and telephone contacts
- An improved customer experience due to
 - Clearer and more effective online processes that enable quicker decisions
 - Being able to spend more time focussing on applicants who may be particularly vulnerable e.g. carrying out home visits
 - Customers having a better understanding of the criteria for making an application
 - The provision of information about wider housing options via personalised housing plans

Tips for others considering the same approach

- Invest time in consulting across all local authorities to agree on relevant housing legislation to be integrated into the triage assessment process
- Find out what works by conducting user research
- When developing the digital platform focus on the needs of customers rather than those of the partnership
- Agree plans to manage content, so it remains accurate and up to date

4. Low demand

When exploring the issue of low demand, workshop participants at all five workshops told us that the 'pool' of potential tenants is often limited, because of restrictions in statutory allocation policies and the stigma attached to who social housing is for. They suggested that the stigma issue could be partially addressed if CBL systems were less archaic and more appealing to a wider group of people who may dismiss social housing as not being for them.

Workshop discussions revealed that commercial online platforms manage to reach people that CBL does not, so providers are questioning if they are paying enough attention to the power of the medium being used and the way in which homes are positively 'sold' rather than the properties themselves. CBL is primarily used to ration social homes but there is a marketing element that is possibly not being fully utilised. If landlords are advertising low demand properties via other online platforms, where they can be successfully allocated outside of CBL restrictions, this suggests the problem is with scheme criteria and inflexibility with IT systems rather than the CBL model itself.

Workshop participants did raise concerns about the lack of transparency and fairness when properties are advertised via other online platforms because they are more likely to be allocated on a first come first serve basis rather than via a system that prioritises need. However, they argued that this could be addressed by providing information about properties that are let in this way.

Allowing housing association partners to do their own shortlisting via an online portal is being used in some partnerships to help avoid the need to use other online services, except when it is considered the only way to let a property.

Workshop discussions highlighted a number of ways local authorities and housing associations can tackle low demand, including:

- Introducing a policy that allows for direct lettings once a property has been refused a certain number of times.
- Focusing adverts on what is being offered so they are more targeted or appealing by providing more positive information about the property and landlord.
- Providing more pictures but make sure IT systems can deliver this and that the lettable standard is of a decent quality.
- Exploring flexibility with void standards including offering part- or fully-furnished homes and/or allowing for some items e.g. carpets, curtains/blinds to be left in properties by previous outgoing tenants.

Social landlords operating in areas, where there are issues with low demand (mainly in the North, although pockets of higher demand still exist in these areas), are competing with the PRS due to rent levels often being similar to, and sometime lower than, social housing rents. It was argued that in these areas, the PRS has more to offer in terms of marketing, control over allocations and standard of letting, including the option to provide furnished or part-furnished properties. There are 'less hoops to jump through' in the PRS so landlords can have a better turnaround time as a result.

A strong theme to emerge from our workshops was that the quality of homes advertised is often poor, making it difficult to attract potential tenants. In fact, a number of participants commented that they do not include internal photos in adverts because they fear it will put people off. This may be more of an issue in areas of low demand where there is competition with the PRS. But this raises questions about whether housing providers are achieving the right balance between minimising vacancy times and costs and maintaining a satisfactory standard of the homes they are letting.

Every workshop discussion highlighted that section 106 local connection requirements can create barriers to letting homes. Criteria can lengthen vacancy periods because they limit the number of potential tenants, therefore making it more difficult to let homes that are subject to them. They can also place unnecessary restrictions on local authorities' and housing associations' ability to meet housing need because requirements vary, rents will often be unaffordable, and homes may not be desirable for those who would meet the criteria. The impact was felt most heavily in rural areas and the South West region.

5. Partnership challenges to delivering CBL

There was a general appreciation in our workshops that partnership working between local authorities and housing associations to meet housing need can be challenging in the current environment. The focus of local authorities on meeting the housing needs of people in their areas can often conflict with housing associations' objectives to create sustainable tenancies and balanced communities and provide a wider range of housing products. How CBL schemes are run can also pose difficult practical considerations including;

- the length of the application process
- how properties are advertised
- information provided on nominations
- overall vacancy periods

Many housing associations told us they are considering pulling out of a CBL partnership in order to gain more autonomy over how they allocate their homes, especially where agreements exist to allocation all, or most, of their homes via the authority's statutory scheme.

The advertising cycle varies across schemes and can impact on how quickly voids can be filled; if the cycle is too long providers can look to other platforms to get a quicker let for their more difficult to let properties. However, having daily cycles can be challenging for applicants so a balance between landlords' and applicants' needs must be found. The number of bids applicants can place per cycle also vary.

The extent to which CBL is embedded in local systems and the challenge people envisage in reviewing this or deciding to do something different altogether may be putting people off even considering a review. At the very least, it is worth local authorities consulting with partners and applicants to review their current approach to demonstrate they have considered if what they are doing is working and whether and how it can be improved.

People who have applied for a social home through an existing system can offer valuable insight into its performance against stated objectives. Based on the responses we received to our applicant survey, overall experiences of the process for applying for a social home were more negative than positive. When we asked participants to rate the speed of the process and the availability of support and information if they need help with applying, ratings were weighted more heavily towards the negative end of the spectrum. Less than one third (30 per cent) agreed that the process was quick or that support (30 per cent), or enough information to help with applying (29 per cent), is available if they need it.



Conducting a review of CBL may include the following considerations:

- CBL offer refusal rates by;
 - Applicants
 - Partner landlords
- Conversion rates of nominations to tenancies
- Void rates/ length of time in advert to letting
- Applicant experience (application, communication, information, etc)
- Exploring the extent to which people are ending up in homes they want live in through monitoring of tenancy sustainment rates and data about why tenancies are ended
- Advice and advocacy partner consultation
- Lettings plan requirements (working households, age, household types, local connection to a parish for example)

A clear theme to emerge from all workshop discussions is the general lack of understanding and confidence around what local authorities can legally expect of their housing association partners in both the development and implementation of partnership agreements to allocate social housing. It was suggested in one of the workshops that housing associations participate in CBL schemes mainly to foster positive relationships linked with securing grant and development opportunities. From the local authority perspective, these are important levers to drive participation and contributions to meeting housing need from their housing association partners.

It remains clear, however, that some housing associations are considering, or have already taken the decision, to break away from CBL partnerships. A sector survey respondent suggested that the 'trend appears to be moving away from CBL to operating their own waiting list'. One housing association to have done this said, 'having our own waiting lists has proven to be much easier to manage and provides sufficient demand to meet our needs'.



What others are doing

Camden Borough Council

Camden allocates social housing in its borough via its 'Home Connections', which is a traditional Choice Based Lettings approach. Following a comprehensive review of their scheme in 2016, a range of changes were made to improve the performance of the system. Among these changes were, an increased focus on addressing housing and local need instead of prioritising "waiting time" and doing more for overcrowded families with dependent children in Camden.

A review of the impact of the scheme introduced in January 2016 was presented to Cabinet in June 2017, covering the first year of the scheme. The review found that by increasing the number of children rehoused from severely overcrowded conditions by 300 per cent. It has also enabled the council to rehouse more people with chronic and enduring medical conditions into suitable homes.

Camden monitors the performance of their scheme against the following measures:

- The number and proportion of allocations being made under each "reasonable preference" and "local need" group
- The number of dependent children being rehoused from overcrowded housing in comparison with the outcomes from the old scheme
- Reports that forecast allocations allowing proactive intervention
- Applicants' bidding behaviours - Camden can identify who is not bidding to prompt consideration of interventions to address this, from proactive support to possible case closure. Decisions are made on a case-by-case basis.

Tips for others who are reviewing or are considering a review of their scheme

- Deeply analyse the data to see what the outcomes are from the scheme in relation corporate priorities and ask is the scheme doing enough.
- Consult carefully with others including those working in Children's Services, Adult Social Care and teams or partners delivering housing management functions
- Take full account of the views of users of the scheme from the start to the finish of the system, from "I am thinking about applying for social housing" to "I am now settled in my new social tenancy" and all things in between.
- Consider if the application system can be improved, asking whether it can be made easier, quicker and more efficient
- Engage with elected members. To ensure the review of existing scheme and any replacement is subject to intense, prolonged and constructive scrutiny
- Obtain high quality legal advice when changing the scheme, including for external counsel when making significant changes
- Complete thorough equality impact assessments



What others are doing

Incommunities

Incommunities is a stock transfer organisation that owns and manages homes in the Bradford metropolitan district. Following a review of the district allocation with Bradford Council they decided to move away from CBL to a matching system called value-based lettings (VBL). VBL is managed by Incommunities and is delivered via computer system that matches applicants to properties based on their preferences, priority and waiting time. There is no advertising cycle and instead Incommunities, and other partners in the scheme, use a self-service service system to identify potential applicants to offer properties to.

Their review was prompted by a series of issues they were experiencing with the previous CBL system:

- There were many duplicate applications
- The self-service platform was difficult for customers to use
- Many applicants were not bidding on properties they wanted to live in. They were bidding based on the assumption that it would keep their applications active or would increase their likelihood of getting housed
- There was little or no information provided to help applicants make informed decisions about their applications e.g. chances of securing a tenancy based on their application details and bidding preferences
- The CBL model was unable to deal with the volume of voids that developed following the introduction of the bedroom tax

VBL is one part of a wider approach to allocating homes that includes some important supplementary practice:

- Operating a low demand policy where properties can go to direct lettings following five unsuccessful offers
- Using a combination of direct marketing to people on the waiting list or via the use of a commercial lettings system to generate demand

- Using strategic asset management to make decisions about properties that have no longevity via the allocations system

Incommunities report a variety of benefits to using VBL alongside this supplementary activity:

- It allows instant matching because there is no advertising cycle
- Cases have a limited life, so inactive cases do not build up on the list – the average waiting time for 50 per cent of applicants is 4-5 months
- The new system can report on most aspects of applications, so there is now a better understanding of demand by property type, area and demographics. This helps to maintain lists and because close working between local authorities and landlords is essential here, it can have beneficial effects for partnerships
- Their void turnover has reduced by 6%

Tips for others considering the same approach

- Try to avoid using an allocations system to control demand but rather use it to respond to it. Using an allocations system to control demand (by tightening criteria etc), simply masks the underlying issues and could result in problems elsewhere e.g. rough sleeping
- Think about how to simplify the application stage of the process. In an area where social landlords are potential competing with the PRS to let their homes, the amount of time it can take to register can be a key determinant in whether someone decides to 'choose' the PRS to meet their housing needs. Shortening the applications stage and pushing the majority of the 'checks' etc. towards the lettings stage could help with this.
- It does not really matter which model is used to allocate homes. What matters most is the range of activity that happens around it, to provide flexibility to let properties and meet urgent housing need when the system is unable to. It is important to use a system in a way that provides this flexibility.

What others are doing

South Liverpool Homes (SLH)

In 2013 SLH withdrew from the CBL system after an internal review and through consultation with their customers found that the policy was complicated, and the system was not as user-friendly as they would like it to be. For SLH, there were various reasons why they needed to take this decision, including:

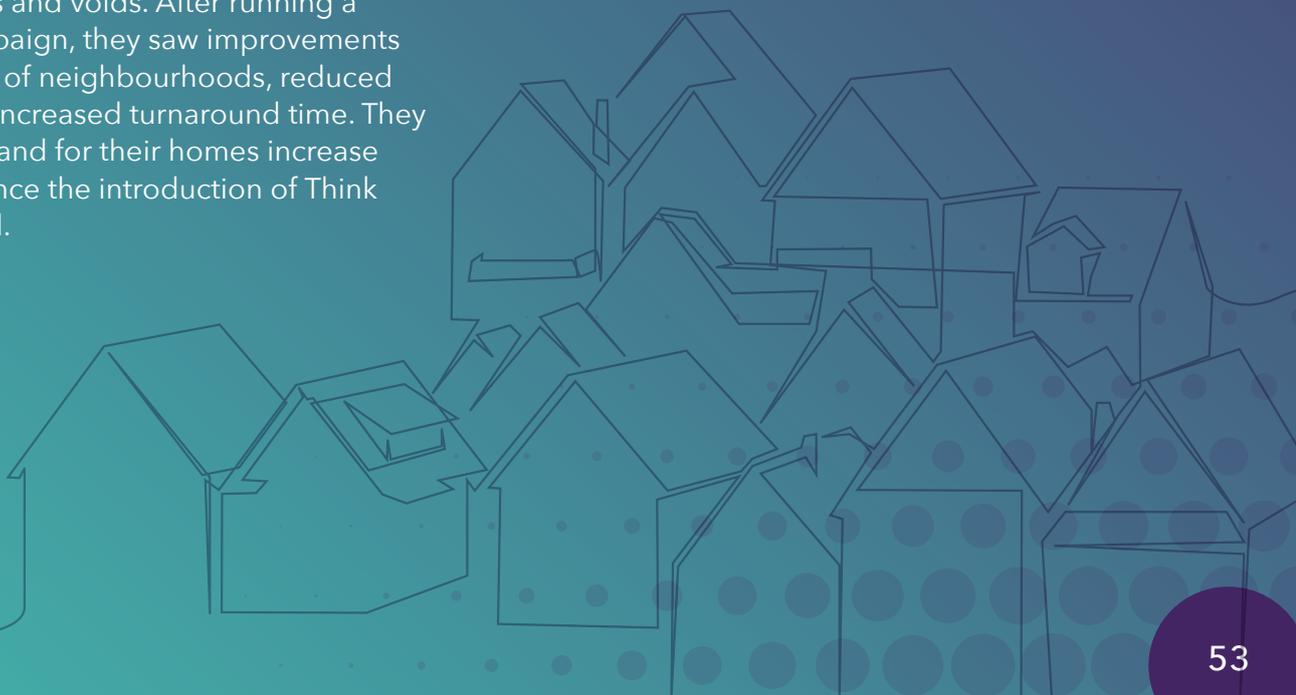
- They felt the IT system was causing considerable duplications due to it not being interfaced with their system
- They preferred a simpler system for determining priority as they saw this as providing more clarity for users
- They wanted to provide a website that is easier for applicants to access and navigate. They also wanted to ensure it is widely publicised
- They wanted to address delays in the lettings process that results in extra weeks of rent loss
- They felt that staff resources would be better used by investing in their own system that better meets the needs of them and their customers

SLH decided to introduce their own waiting list and allocation policy where homes are allocated on a date order basis only, with the date being enhanced depending upon applicant need and personal circumstances. This system is delivered via their Think South Liverpool team who manage their allocations and voids. After running a successful campaign, they saw improvements in sustainability of neighbourhoods, reduced void costs and increased turnaround time. They have seen demand for their homes increase considerably since the introduction of Think South Liverpool.

Rent ready visits are completed at applicants' homes when they are one of the highest ten applicants waiting for a new home. The purpose of this visit is to check there are no changes to the applicants' details, that the applicant can afford to move and will be ready to do so. SLH offer a range of support to help people who face particular barriers to accessing a home. For example, they have partnership arrangements with Crisis Skylight Merseyside, children's social care services and other local services to provide homes to people who have been homeless or who face homelessness, care leaver and refugees.

Tips for others considering the same approach

- Complete a thorough assessment of your current approach to allocations via internal review and through consultation with customers and partners before deciding whether to continue with it
- If your assessment finds that it is the right thing for your organisation and customers to develop an alternative approach, have open and honest conversations with CBL partners about your decision
- Decide how you will continue to assist the local authority with meeting housing need and if possible, form an agreement that is subject to monitoring and review. This can include working directly with housing options teams to prioritise applicants based on their needs.





Recommendations for central government

- CORE lettings forms should be amended to require information on whether a property was advertised via a commercial online platform to secure the letting.
- Provide local planning authorities with guidance on how to consider, agree and set local connection requirements in section 106 agreements.

Recommendations for those involved in systems for accessing social homes

- Providers should consider what items can be left in properties by previous outgoing tenants.
- Providers should consider making a proportion of their properties part- or fully-furnished.
- Providers should review their lettable standard to explore ways to improve the marketing of properties, particularly in areas of low demand.
- If alternative commercial online systems are being used to let homes, this information should be available to CBL applicants to maintain transparency.
- Local planning authorities should take a more considered approach to agreeing section 106 local connection requirements by:
 - o Fully assessing whether they are needed at all, other than to secure support for development.
 - o Working closely with housing authorities to inform the details of requirements.
 - o Ensuring there is a phased approach to requirements so local housing authorities and housing associations have more flexibility to allocate homes if they cannot identify a suitable applicant at the first attempt, for example.
 - o Including a mechanism for review to ensure they are still needed and that the requirements are not restricting allocation processes.

Nominations agreements

Nominations agreements can be effective mechanisms for balancing the needs and priorities of local authorities and housing associations when allocating social housing in an area, but a lack of guidance on their development and use prevents organisations from realising their potential.

In the current policy environment it is becoming more difficult to resolve tensions around the suitability of nominations and the extent to which agreements are up against conflicting objectives. These tensions are not new, they have been explored before in, 'Problematic nominations' ([Cowan et al, 2007](#)), which highlighted:

- the importance of relationships 'as the main mechanism for making the nominations system work'
- the need to find a balance between highest need and sustainable communities and tenancies
- the importance of a variety of agencies to provide packages of support to 'vulnerable households' and concerns about the reliance of many of these agencies on Supporting People funding
- how many tensions exist due to 'problematic practices' rather than because of problems arising from people who had been nominated

In [2015, the Smith Institute](#) highlighted concerns among local authorities that housing associations were adopting "a more risk-averse attitude to allocations and local authority nominations" by applying affordability criteria, most notably for affordable rent properties, and by being more reluctant "to accept nominations from vulnerable households or those with a record of antisocial behaviour or rent arrears" (page 7). The report highlighted that both local authorities and housing associations point to the policy environment as a leading cause of these changes.

Nominations agreements remain a commonly used tool with 78 per cent of our sector survey respondents saying they have at least one agreement in place. However, less than half (41 per cent) of these said they had carried out a review of an agreement in the last five years and one third (33 per cent) told us existing agreements are not working well in practice. Challenges include:

- Conflicting priorities and views over who should get access to housing
- Some agreements are old and do not reflect the current environment
- Insufficient information on nominations can cause delays to lettings. This is often exacerbated by processes that only send one nomination at a time
- Use of pre-tenancy processes to assess tenancy readiness are seen by some local authorities as too restrictive but some housing associations feel they are needed to ensure homes are let to people who can manage a successful tenancy
- Lack of reporting mechanisms to monitor outcomes of nominations e.g. if it led to a tenancy start and what household types are being 'accepted' and 'rejected'

But one sector survey participant told us that, "due to conflicting views and priorities it can be difficult to review and/or renegotiate nominations agreements". Other comments referred to how competing objectives are impeding their ability to find a balance when agreeing on nomination quotas and processes. These tensions often arise when the statutory framing of housing need (discussed above) restricts housing associations' access to wider groups of people, whose needs are not specifically catered for in the legal framework but for whom social housing would arguably be the only suitable option.



While our workshop discussions highlighted a general lack of clarity around the central role of nominations agreements and the legal expectations arising from them, participants highlighted some key points to consider in order to reap the benefits of these mechanisms, including:

- Strong partnerships are needed for allocation systems to work effectively and having formal or informal partnership forums/meeting can provide an effective environment to explore issues, achievements and challenges together.
- Local authorities providing accurate and up to date information on nomination referrals to help inform pre-tenancy processes.
- Having a clear process for following up, or feeding back, on nomination outcomes can provide useful insight into existing agreements to monitor progress and inform review decisions.
- Monitoring of conversion rates of nominations to tenancies and for which groups, which is important information if agreements are to be reviewed properly and to hold providers to account on their individual contributions to providing homes to people with support needs. This information can also help inform local housing policy and strategy decisions.
- Regularly reviewing and updating nominations agreements as part of a framework for partnership working to meet housing need in an area.
- Having a clear procedure for dispute resolution that prioritises informal routes before escalating to formal challenge and what this entails.



Nominations and nominations agreements

What is a nomination?

A nomination is the process through which a local housing authority meets the housing need of someone who is registered via their statutory allocation scheme, by referring them to a landlord with whom they have an agreement.

What does the law/regulations say?

Under [section 159 \(4\) of the Housing Act 1996](#) housing authorities in England allocate housing when they nominate someone, who is registered via their allocation scheme, to be a tenant of a social landlord.

Under section 170 of the same Act, housing associations are required to assist local authorities with carrying out their housing functions by co-operating 'to such extent as is reasonable in the circumstances' to offer housing 'to people with priority under the local authority's allocation scheme'.

The [Tenancy Standard \(2012\)](#), which is part of the consumer standards in the regulatory framework for housing associations in England, requires provider to;

- o 'let their homes in a fair, transparent and efficient way'
- o 'take into account the housing needs and aspirations of tenants and potential tenants', and
- o 'demonstrate how their lettings: a) make the best use of available housing b) are compatible with the purpose of the housing c) contribute to local authorities' strategic housing function and sustainable communities'
- o Have 'clear application, decision-making and appeals processes

Under this standard, housing associations are also expected to 'co-operate with local authorities' strategic housing function, and their duties to meet identified local housing needs. This includes assistance with local authorities' homelessness duties, and through meeting obligations in nominations agreements.'

What is a nominations agreement?

A nominations agreement is an agreement, negotiated between local authorities and housing associations, that stipulates the proportion of homes the local authority can access by nominating people who are registered via their housing allocation scheme.

What should be in an agreement?

- o The percentage of homes the housing association agrees to be allocated via the local authority's statutory allocation scheme
- o Any specific breakdown of the proportion of the types of homes to be made available for nominations
- o Any specific breakdown of a proportion of the types of households to be housed as a result of nominations
- o Information required when nominating an applicant
- o Timescales for notification of outcomes of nominations
- o Information to be collected to monitor performance e.g. conversion rate of nominations to tenancies and which household types are being housed via nominations?
- o Review arrangements e.g. frequency, who will be involved and what will be subject to review
- o Procedure for dispute resolution

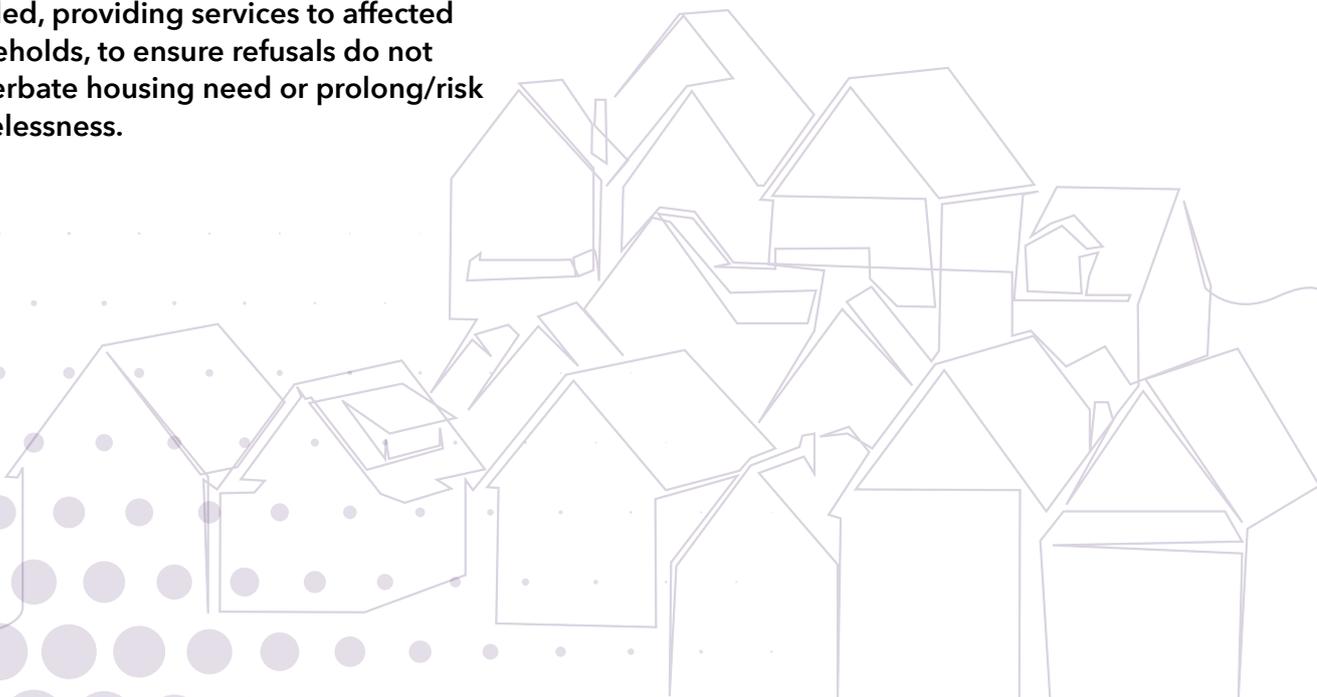


Recommendation for central government

- **Government should develop a toolkit to support local authorities and housing association in the development, monitoring and review of nominations agreements**

Recommendations for those involved in systems for accessing social homes

- **Local authorities and housing associations should work in partnership to:**
 - **Review their nominations agreement if they have not done so within the last five years.**
 - **Agree arrangements for monitoring indicators of performance, including conversion rates of nominations to tenancies, refusal rates, reasons for refusals, and the percentage of lets to particular groups e.g. homeless households, survivors of domestic abuse and young people.**
 - **Use information gathered via monitoring arrangements to inform local housing need and associated strategies and action plans.**
 - **Agree a process for preventing refusals of nominations wherever possible and in the event they cannot be avoided, providing services to affected households, to ensure refusals do not exacerbate housing need or prolong/risk homelessness.**





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Appendix A

Glossary of key terms and definitions

- **Allocations**

The process for local authorities selecting someone to be a tenant of accommodation owned by them, or by nominating someone for a housing association or another local authority tenancy, under part 6 of the Housing Act 1996.

- **Allocation scheme**

The way a local authority determines priority and the procedures they will follow when allocating social housing, in accordance with part 6 of the Housing Act 1996.

- **Affordable housing**

A term that applies to homes that are not provided by the market and are therefore more affordable to people on lower incomes. Affordable housing includes, social rented housing, Affordable Rent housing, shared ownership and Intermediate Rent homes.

- **Affordable Rent**

A rent level that is set at up to 80 per cent of the relevant market rent.

- **Arms-length Management Organisation (ALMO)**

A non-profit company set up by a local authority to manage all or part of its housing stock. ALMOs typically deliver housing management functions like lettings, void turnaround, income collection, tenancies/ neighbourhood management, for example. Some are also responsible for delivering statutory homelessness and allocations services.

- **Choice Based Lettings (CBL)**

An approach to allocations that gives people the opportunity to bid, or express a preference, for advertised local authority and housing association homes.

- **Direct lettings**

Tenancies that are created outside of the statutory allocations scheme, mainly by housing associations when they allocate homes not subject to an existing nominations agreement.

- **Direct offers**

When an offer is made without the home being advertised via CBL and the applicants typically has no opportunity to bid or express a preference for it. Direct offers are usually made to address a particularly urgent housing need e.g. to prevent or relieve homelessness.

- **Discretionary Housing Payments (DHPs)**

Discretionary Housing Payments are administered by local authorities as part of a DWP scheme to provide additional support to housing benefit claimants they deem to be in need of extra help with their housing costs. Apart from a limited number of broad requirements and restrictions, it is up to local authorities how to administer and allocate DHPs. Funding allocations to each local authority vary, awards are time-limited and once a local authority's funding runs out, they have the option to top it up by up to a maximum of two and a half times the original allocation amount.

- **General needs social housing**

Non-specialist housing that is owned and managed by social landlords



- **Homelessness**

Homelessness describes the situation of an individual, family or household where they are without accommodation or access to accommodation, as defined in part 7 of the Housing Act 1996. People are homeless according to this definition if they lack accommodation that they are legally entitled to live in, or they have accommodation, but cannot gain access to it or cannot reasonably be expected to continue living in it.

- **Housing association**

A non-profit organisation that provides lower cost housing to people in housing need.

- **Lettings**

The process through which social landlords start tenancies for people they have agreed to rent their homes to.

- **Lettings plans**

Lettings plans set out how properties will be allocated in specified circumstances to meet area-specific issues. They can help ensure new developments house tenants in a range of income groups, meet local priorities and address ASB issues. They are usually used in order to achieve sustainable and balanced communities.

- **Lettings policies**

Lettings policies set out the criteria a landlord has in place to determine requirements and considerations before starting a tenancy, such as whether they can afford it and what support they may need to help them manage it.

- **Local lettings policies**

A framework for allocating homes outside of a wider local scheme to address localised issues and/or priorities.

- **Local connection**

Having a connection to a specific area or location because of working or living there, having close family there, or because of some other special reason.

- **Local Housing Allowance (LHA)**

LHA refers to the level of help towards housing costs working age people on low incomes are entitled to when living in the private rented sector.

- **New lettings**

All social housing lettings reported via MHCLG's continuous recording of social housing lettings system (CORE). This data return captures information on the characteristics of the household and property each time a social or affordable property is let.

- **Nominations**

The process through which a local housing authority meets the housing need of someone who is registered via their statutory allocation scheme, by referring them to a landlord with whom they have an agreement.

- **Nominations agreement**

An agreement negotiated between local authorities and housing associations, that stipulates the proportion of homes the local authority can access by nominating people who are registered via their housing allocation scheme.

- **Personalised Housing Plans (PHPs)**

A document that must be developed for all people owed a prevention and/or relief duty under the Homelessness Reduction Act 2017. It should set out the practical and reasonable steps for the housing authority and the applicant to take to help the applicant retain or secure suitable accommodation, taking into account the information collected in an assessment of their case.

- **Residence requirement**

How long an applicant must have been resident within a local authority's area in order to qualify to join their scheme. Residence requirements are one in a range of potential local connection criteria.

- **Section 106 agreement**

Section 106 agreements are legal agreements between local authorities and housing developers that set out planning obligations attached to a new housing development. For the purposes of this report the relevant obligation is for providing affordable housing. Section 106 agreements can include a requirement that people with a local connection are prioritised when deciding gets to live homes provided through them.

- **Social housing**

Social housing, like 'affordable housing', is a broad term that applies to homes that are not provided by the market and are therefore more affordable to people on lower incomes. Social housing includes social rented housing, Affordable Rent homes, shared ownership and Intermediate Rent homes that are provided by local authorities and housing associations. For the purposes of this report, the definition of social homes and social housing refers only to homes for rent.

- **Social landlords**

Social landlords are providers of social housing who are registered with the Regulator of Social Housing, including local authorities and housing associations

- **Social rented housing**

Social rented housing is the cheapest form of affordable housing that is usually owned and managed by local authorities and housing associations.



Appendix B

Methodology

Desktop review of existing literature

- Policy and legislative developments
- Official statistics
- CIH publications
- Reports and academic insight
- Media commentary

Twitter debate

We ran a Twitter debate for one hour on 8th November 2018, prompted by the following questions:

1. What are the biggest challenges when it comes to allocating social housing to people who need it?
2. While there's a significant shortage of genuinely affordable rented homes, some form of rationing is inevitable but are allocation models geared up to help those most in need of this limited resource?
3. Do you think people are being excluded from social housing? Why?
4. Are there any more aspects of the allocations process that organisations need to improve?

Sector survey

A sector survey ran from 31st October to 30th November 2018, asking 49 questions across a range of allocations-related topics including allocation/lettings policies, lettings systems, factors influencing approaches to allocations, eligibility and access, lettings and nomination agreements. The survey was designed and developed in consultation with the project sounding board.

The purpose of the survey was to explore how general needs social housing for rent is being allocated across England and what factors may be influencing local policy/ practice in this area.

The survey was targeted at senior managers, policy officers or staff members with experience of the way their organisation allocates social homes.

We focused on general needs social homes for rent only.

Total responses = 106

- 51 are registered providers of social housing (housing associations)
- 55 are local authorities or ALMOs
- 34 with retained stock
- 18 LAs that have transferred their stock

Workshops

We ran five workshops across the country. A total of 53 participants (15 councils, 6 ALMOs, 22 RPs, 5 charities (although all part of Crisis skylight group operating independently in each of the regions), 1 academic, 2 MHCLG representatives, 1 combined authority and 1 regional housing body.

1. South West
2. East/London/South East
3. Midlands
4. North West
5. North East/Yorkshire and the Humber

The workshops aimed to:

- o Explore the range of criteria being used to decide who gets access to housing waiting lists and how applicants are prioritised in allocation schemes
- o Explore a range of perspectives on the systems being used to advertise and allocate general needs social housing for rent
- o Understand what factors are influencing different approaches to allocating homes
- o Consider the role of pre-tenancy activity as part of the lettings process
- o Explore the benefits and challenges to partnership working
- o Consider policy and practice solutions to the challenges faced by organisations involved in the allocation and letting of social homes
- o Explore thoughts and ideas about how allocation systems can be improved - what would a 'good' or 'ideal' system look like?

Applicant survey

Number of respondents = 82

- Half (50 per cent) of respondents were already living in social housing
 - o 38 percent were housing association tenants
 - o 12 per cent were council tenants
- Almost one quarter were living in the PRS (23 per cent)
- 10 per cent were living with family



Appendix C

Stages and criteria in the allocations process

Stage of the allocation process	Possible criteria that can be applied
1) Getting on the list	<p>Eligibility (immigration status) is set out in legislation so there is no flexibility</p> <p>Qualification:</p> <ul style="list-style-type: none"> • Residency and/or local connection requirements at the time of application • Past conduct (rent arrears, anti-social behaviour (ASB), and committing criminal offences) • Income thresholds (having the means to secure housing in the private market) • Whether someone is a home owner • Some categories of former armed forces personnel are excluded from being disqualified and other groups of people can be set out in regulation by the Secretary of State. • People whose application has been suspended and review decision determines if they will qualify to join the housing register/waiting list • Any other 'classes' of persons the local authority determines do not qualify for an allocation of social housing
2) Priority	<ul style="list-style-type: none"> • People who fall within one of the reasonable preference categories set out in the legal framework (part 6 Housing Act 1996) • Definitions of classes within priority groups (e.g. homelessness may be broken down into different types and therefore levels of priority can vary and can include those at risk of homelessness, non-priority homeless, intentionally homeless etc.). • Prioritising those who are working or making a community contribution. • Boosting priority in certain circumstances e.g. working households, those looking to downsize, people who have completed some form of tenancy-ready training, local connection (rather than disqualify them), or other groups based on local pressures (like temporary accommodation use for example). • Reducing priority for those with rent arrears or a history of ASB/ criminal offences - often such action comes with flexibility to lift the reduction/suspension once conditions have been met e.g. if arrears are cleared or a repayment arrangement has been adhered to for a set amount of time, or an agreed amount has been repaid • Section 106 requirements
3) Getting the keys	<ul style="list-style-type: none"> • Pre-tenancy assessments • Ability to pay the rent • Support needs • Evidence of managing a tenancy or living independently • Rent in advance • Individual landlords' lettings policy requirements (working households, age, household types, local connection to a parish for example)



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