

### Briefing report: A Single Access Route to Housing for north east Wales

#### Introduction

SARTH (Single Access Route to Housing) is a partnership project between all the major social landlords in north east Wales, covering in the local authority areas of Conwy County Borough, Denbighshire, Flintshire and Wrexham County Borough

The partners are:

- Conwy County Borough Council
- Denbighshire County Council
- Flintshire County Council
- Wrexham County Borough Council
- Cartrefi Conwy
- Clwyd Alyn Housing association
- Cymdeithas Tai Clwyd
- North Wales Housing
- Wales and West Housing

The over all aim of SARTH is:

**To provide a common access route to a range of affordable housing options which is transparent, legal, efficient and accessible to all sections of the community.**

By working together to achieve this aim, we can share our strengths and good practice and place the customer at the heart of everything we do.

Through the project, we can simplify the access route to advice and to housing with one clear purpose: to help people find a home to meet their needs.

This briefing sets out the following:

Part 1: The challenges facing social housing landlords across north east Wales

Part 2: The aims of SARTH

Part 3: The draft common allocations framework (CAF)

## **Part 1: The challenges facing social housing landlords across north east Wales**

### **Separate housing registers and allocation schemes**

Currently each organisation has a separate housing register and allocation scheme. This means that people seeking a home must apply several times to different landlords and their application may be dealt with differently by each partner. This can lead to confusion and inconsistency.

Consider, for example, Carol, Pete and their son Robert, who live in north Wales, in a privately rented house. Carol is disabled and needs a stair lift and the bathroom adapted to meet her needs. Their landlord doesn't want to alter the house and wants them to move out. They've been on the council list for five years but the council don't have anything for them.

Jane works at a local housing association and a two bedroom house has become available. She checks her waiting list. They have someone who wants a two bedroom house, but the house has adaptations and the applicant doesn't need them. Jane looks at her nominations quota. She could ask for a nomination and hope she gets someone who needs adaptations or give the house to the person top of her list and rip the stair lift out. What should she do?

Well, happily for Carol, Pete and their son Robert, Jane did seek a nomination from the council and they were successfully rehoused in a property adapted to their needs. But, they were lucky. In other cases, which we won't hear about, people may be passed over because they aren't on the right list. Wouldn't it be better to have one system which would automatically have matched Carol and Pete to their new house and not relied on chance?

Consider another example. Mary has two children and is looking for a two bedroom house on the north Wales coast. She is on the waiting list with the council and three housing associations. It's August 2011, she's at the top of the council's waiting list and is nominated to a housing association. They aren't able to make contact with her. Three months later, the council have a suitable property available and she is still top of its waiting list. Paul, an estates officer at the council, tries to contact her. He fails, but after some work discovers that in fact she was rehoused by a different housing association back in July 2011. He closes the file and turns to the next person on the council list.

These stories tell us that multiple lists and schemes waste time and resources and may result in someone in need being overlooked because they are not on the right list. The current system as a whole can be inconsistent, inefficient and potentially unfair.

Moreover, agencies often work across county boundaries, as do housing associations. This suggests that clear benefit may be gained by creating a single framework that delivers one route to housing in each local authority area and delivers consistency across the whole region.

### **The legal context and local factors**

The legislation on housing allocations determines that the principles guiding each partner's allocation scheme are very similar. They are all based on the concept of reasonable preference for

certain categories of housing need. Hence, it should be possible for partners to adopt a common allocations framework and to have a shared housing register so that applicants can apply to all partners via one route.

At the same time, partners have a responsibility to prioritise the needs of the people in urgent need and to meet the needs of local people and address local housing issues. This presents a challenge to the partnership to design a framework which allows partners to prioritise people in urgent need and people in housing need who have a connection to a particular area, providing this is done in accordance with legislation. Furthermore, it challenges us to ensure that advice given to people at the point of application is locally relevant.

### **Demand for social housing**

In each local authority area the demand for social housing, as evidenced by the number of applicants on waiting lists, greatly exceeds the supply of properties for let. As a result, the majority of applicants have no realistic chance of being rehoused in social housing for many years and as a consequence their housing needs are not being met via the allocations systems.

For example consider an applicant looking for a one bedroom flat in Prestatyn. Wales and West Housing have analysed their waiting lists and given the turnover of available properties and the number of applicants waiting, they estimate that half the people on their list looking for a one bedroom flat in Prestatyn would have to wait over twenty years to be offered a property. Those at the bottom would have to wait about fifty years. It is very unlikely that their needs will be the same if and when they are offered accommodation. For these reasons, the current waiting lists are often not helping people find housing.

### **Housing options advice**

Because there is little prospect of an increase in availability of social housing, the situation we face implies that the best option for the majority of people waiting on housing registers is to look for alternative housing. However, people in this position do not consistently get timely, accessible and useful advice about alternative housing options.

Consider again the case of Carol and Pete mentioned above. We spoke to them when they were rehoused and they told us that they moved away from the region five years ago to find a home, which is unfortunate but not unusual. However, they have come to realise that they weren't given the best advice at the time. They only recently heard about a council scheme which could have helped them with a bond to secure good quality private accommodation. Had they known about the scheme five years ago, they may have been able to avoid uprooting their family and moving away, only to return again later.

The challenge is to provide consistent and useful advice to all customers in a timely fashion, no matter which partner organisation they contact.

### **Management of expectations**

Analysis of the management of current and past oversubscribed registers reveals that much officer time is spent dealing with people's queries about the application form, their position on the list or

their points.<sup>1</sup> Given that most people on the list unfortunately will not get rehoused, this represents a waste of resources and time, both for the customer and the provider. Expectations are not being managed. Indeed expectations are being raised unreasonably by people being registered on a list when they have very little chance of being re-housed through that route. Better housing options advice would manage these expectations and give people information about realistic options that are available. These problems are compounded by the existence of so many registers and different allocation systems.

## **Summary of challenges**

We summarise the background challenges driving the project as follows:

- The existence of separate housing registers and allocation schemes causes confusion and dissatisfaction, for applicants and agencies working with applicants, such as health, social services and voluntary organisations.
- Landlords do not have sight of each other's waiting lists and so people in need can get overlooked because they are not on the right list. Thus housing need is not being met consistently.
- Each partner allocates housing within the same legal framework, according to the legal principle of reasonable preference. Within this, partners may prioritise according to urgent need and local connection.
- Demand for affordable housing far outstrips supply across all counties.
- Where waiting lists are long, there is often little chance of those with lowest or no need being housed in a reasonable time. Their being on the waiting list raises expectations that cannot be met and serves no clear purpose.
- Considerable officer time is wasted explaining to dissatisfied customers why they will not be rehoused, rather than working with people to find different solutions. If expectations are better managed, then customers can be directed to other affordable housing options that are available to them.
- Not all sections of the community are being made aware of the full range of affordable housing options open to them, in a way which enables them to make informed and timely decisions.
- Applicants' support needs are not always identified at an early stage, resulting in unnecessary delays and/or inappropriate, unsustainable lettings

## **Part 2: The aims of SARTH**

The SARTH partnership has grown out of an initiative of Conwy and Denbighshire, who commissioned Jane Richardson from Glyndwr University in November 2010 to undertake preliminary research into developing common access to housing.

The research highlighted the issues presented above and in order to address them recommended having a common register and allocations scheme and making the process simpler and more accessible.

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<sup>1</sup> Partners monitored customer queries over a period of two weeks in 2011.

It also recommended that the allocation scheme be integrated with an enhanced housing options advice service, to better manage demand and give people better advice to better solve their real needs. This housing options service needs to be locally expert so that people receive advice relevant to them and their needs and preferences at their first point of contact with the common system.

SARTH aims to deliver these solutions and is now a partnership project consisting of the nine partners listed in the introduction, together with Glyndwr University, who operate as a source of independent challenge and advice. The project has a steering group which brings together senior officers from each partner and a working group which brings together allocations, housing and strategy managers.

The project has built on the recommendations above and aims to develop the following:

- **A shared approach to the delivery of housing advice and options.** This aims to better manage customer expectations about the allocation of social housing and provide high quality advice about the whole range of affordable housing options that are available. The advice will be consistent, timely, accessible and locally expert.
- **A shared applications process and shared housing register for social housing.** This will give customers one route to apply for social housing in the area where they want to live. Their application will be placed on a single shared register, so they can be prioritised by all landlords with properties in their chosen areas at the same time.
- **A common allocations framework.** This will provide a consistent assessment of housing need which prioritises those in urgent need. Local connection criteria will still be defined at the local authority level and so the common framework will still in effect be specific to each local authority area. However, the process and approach will be shared. Collaboration will allow good practice to spread.

The project has adopted the following aims and objectives:

### **Aims:**

The project aims are to:

- Make services more accessible
- Meet housing need with a wider range of solutions
- Using stock more effectively
- Encourage balanced and sustainable communities
- Ensure Value for Money
- Enhance customer service
- Take into account applicants' individual needs and preferences.

### **Objectives:**

The objectives of the partnership are:

- To meet the legal requirements for the allocation of social housing as set out in the Housing Act (1996), Homelessness Act (2002) and relevant Code of Guidance
- To comply with the requirements of the Equality Act 2010 and associated legislation
- To ensure that services are responsive to the needs and aspirations of existing and potential customers
- To ensure that those with the greatest housing needs have those needs met
- To ensure that the system is accessible to all potential applicants including access to information, advice, and completion of information requirements
- To reduce barriers to mobility between local housing markets
- To ensure that there is sufficient flexibility to respond to the needs of their customers at the community and estate level
- To ensure consistency in the way in which applicants are treated by all the partner organisations
- To empower applicants and support them to make informed choices about where they want to live
- To provide appropriate, accurate and realistic advice relating to the availability of affordable housing at the point of application
- To provide improved services for vulnerable people who may find it difficult to apply for housing and offer continuing assistance to them in maintaining a successful tenancy
- Help to tackle homelessness and its causes in the region/ locality
- To provide a means *for* assessing housing need across the partnership area
- To facilitate access to alternative housing options including low cost homeownership, intermediate rents and social and private lettings
- To make best use of existing social housing stock
- To maximise customer satisfaction improve the customer service housing applicants receive and ways to ensure that their housing aspirations are realistic.

### **The Opportunity of the SARTH project**

National policy is strongly in favour of collaboration at a regional level on housing and of an emphasis on high quality housing options advice. This is supported by the Welsh Assembly Government strategy “Improving Lives and Communities: Homes in Wales” of April 2010, by the draft “Welsh Assembly Code of Guidance for local authorities on allocation of accommodation and homelessness consultation document” of March 2011 and by the white paper “Homes for Wales: A white paper for better lives and communities” of May 2012.

The white paper “Homes for Wales” states on page 16 that its vision is a future where “there are even better, more integrated policies and public services and joint action between organisations, with effective collaboration between local authorities.”

SARTH has received a vote of support from the Welsh Assembly. The project has won funding from the Assembly through the Social Housing Management Grant programme, to support the development of a pilot over the next 18 months, leading to a fully developed service following this. We see this as a sign that our vision of collaboration on a regional scale combined with a localised approach to service delivery is on the right track.

Funding of £14,227 for 2011/12 and of £34,450 for 2012/13 was sought and has been awarded in full. Further funding of £86,000 for 2013/14 and of £62,800 for 2014/15 has been applied for and a

decision on this is expected later in this financial year. This would amount to half of the projected total project costs of £394,955.

SARTH represents an opportunity for all partners to create a collaborative solution which could address the collective challenges facing us. If we work together, we can build a new regional service to allocate the stock we have in a better way and to give all customers better support and advice, so they can find an alternative to just remaining on a waiting list which might never give them anything back. This is the challenge and this drives partners on, to make the project work.

### **Part 3: Draft Common Allocations Framework (CAF)**

A draft common allocations framework (CAF) is being developed and will be finalised over the period June – August 2012, with the intention of taking this out for public consultation from September 2012. The draft will be shared internally by partner organisations during this time period or shortly afterwards and organisations asked to agree to move to the consultation phase. There are still certain outstanding points which must be agreed during this same period, which are detailed in the appendix below.

Once a consultation draft has been agreed by the partnership steering group, it will be taken out for public consultation. This may be done in a phased approach, depending on how each partner wishes to proceed.

This report highlights key elements of the draft CAF below and then sets out the points in the CAF which must still be determined in order to produce the draft for consultation.

### **Key elements of the Draft CAF**

#### **Consistency combined with a local approach**

- Housing need will be assessed uniformly across the region, providing fairness and consistency to the customer, taking into account people's individual needs and expressed preferences.
- However, the framework has been designed so that in almost all circumstances applicants with local connection will be given priority over applicants without local connection. Thus each partner is able to target the housing stock in each local authority area at people in their own communities who are most in housing need.
- Partners share one register and so an applicant need make only one application to access the whole system. Each partner with properties in an area chosen by an applicant will be aware of the application and able to give the applicant the appropriate priority in the allocation process.

#### **The banding scheme**

- The draft allocations framework adopts a banding scheme to prioritise people in housing need, following the legal principles regarding reasonable preference, additional preference and local connection.
- The scheme is founded on the principle that priority for social housing is given to those in housing need. The definition of housing need is based on the legal concept of reasonable preference. The approach adopted makes use of the further legal powers to prioritise within applicants entitled to reasonable preference according to local connection and urgent need:
  - Amongst applicants in housing need, further priority will be given to those who have a local connection to the local authority area in which they are applying for housing.
  - Amongst people in housing need with a local connection, highest priority will be given to those in urgent need.
- The local connection criterion used is defined as a connection existing between an applicant (or a member of their household) and a local authority area. Thus, the banding criteria used in the allocations scheme are in fact specific to each local authority area. If an applicant applied to two different counties then they would only be given local connection priority in a county where they had a local connection. This enables the common framework and shared register to be at the same time a local authority specific framework and register in each area.
- When a vacancy becomes available, applicants who have expressed a preference for the area and whose household is suitable for the property type are shortlisted. Applicants are ranked on this shortlist by their band, with those in band one given highest priority and so on. Applicants within the same band are ranked according to date of application, with those who have been waiting longest given highest priority.
- The banding scheme represents a new approach, which is a departure from schemes used by some partners in the past, who may have used points. The banding scheme allows greater transparency for applicants and other agencies working with applicants, whilst at the same time ensuring that housing need is prioritised. It aims to better manage customer expectations and provide greater certainty about where on the list customers are.

### **Allocations within the context of housing options advice**

- An enhanced housing options advice service will be provided for everyone who contacts any of the partners looking for somewhere to live. When they first apply, all customers will be asked where they would like to live and what their needs and preferences are. They will be advised of the full range of options open to them in their chosen areas and can then decide where their best options lie, whether via social housing or another alternative, taking into account supply and demand.
- On the one hand, the allocation scheme is focused on those in greatest housing need. On the other hand, better management of expectations is intended to allow partners to focus more of their resources and energy on better advice and a better service to assist those who stand such little chance of being housed via the social housing route to find alternative affordable housing.
- The framework is based on the following guiding principles:



- To ensure that preference for social housing is given to those in housing need and that those in greatest need are given the highest priority.
- To give higher priority to applicants with a local connection to the area for which they are making an application than to those who have no such connection.
- To ensure that the system is fair, confidential and accessible to all potential applicants.
- To make the best use of all the available housing stock
- To ensure consistency in the way in which applicants are treated by all the partner organisations
- To provide a responsive service that treats everyone as an individual
- To empower applicants and support them to make informed and realistic choices about where they want to live

## **Appendix: Outstanding matters still to be determined in draft Common Allocations Framework (dated 31 May 2012)**

Particular outstanding points remain to be decided regarding the content of the SARTH CAF draft May31 (CAF). These points are still to be agreed by partners before a draft is taken forward for consultation. They are detailed below:

1. Partners have yet to decide as to whether a fifth band is to be included in the banding scheme. Band Five would be defined as follows:

“Band five is for applicants who do not have an urgent housing need and who do not fall within any of the reasonable preference categories.”

Partners are waiting on legal advice as to whether applicants not entitled to reasonable preference should be registered, which will decide whether the band is required.

Partners at the SARTH steering group have decided that if there is no legal requirement to register applicants not entitled to reasonable preference, then the partnership would not wish to include such a band in the draft CAF to be taken forward for consultation. This would imply that applicants who do not fall within the reasonable preference categories and do not have urgent housing needs would not be given any priority in the scheme and would not be recorded on the housing register.

The rationale supporting this decision is that supply and demand of housing accommodation implies that registering applicants in this category gives them unreasonable expectations of being offered accommodation, which cannot be met and does not provide a useful service to people looking for housing. It would also result in resources being diverted into managing applications, updating records and handling enquiries which would produce very little benefit for customers. It is the view of the partnership as a whole that resources would be better directed to providing customers with high quality and locally expert advice at the first point of contact regarding the whole range of affordable housing options.

This strategy would include the development of local marketing strategies by partners to advertise any ad hoc low demand properties which became available and which could not be allocated to applicants from the four priority bands in the scheme. In this regard, the proposed scheme would not disadvantage applicants in this category, who would not have been offered any property allocated from the banding scheme because band five would be below all other bands on the scheme.

2. The partnership still has to decide on where to place the following category of applicant:

- Applicants who occupy properties in short supply and which could be used to re-house other applicants who fall within one of the reasonable preference categories and who would otherwise have to wait an unreasonably long time for housing. Such properties would include properties with adaptations, and properties with 2 or more bedrooms which the current tenant was under-occupying.

It is the intention of the partnership to include a category of this type in band two. The exact wording is still to be determined. Partners are also awaiting further legal advice as to whether it is more appropriate to place such a category in the banding scheme, as is the intention, or to use local lettings policies to deal with such cases. It is the view of the partnership that local lettings policies would too cumbersome for this purpose.

3. The partnership still has to agree how to prioritise applicants who have a local connection and are owed a full homelessness duty. In the 31 May draft, they are placed in band two, unless certain urgent circumstances pertain, in which case they are placed in band one.

However, the partnership is giving further consideration as to whether this should be changed. Possible options that have been discussed are:

- a. According such applicants higher priority than all other reasonable preference categories, but less than applicants in urgent need. This would likely be in a band between the current bands one and two;
- b. Keeping such applicants in band two, but using a quota system to give some level of priority to such applicants. This could, for example, be implemented by offering a set proportion of all vacancies to such applicants. This proportion could vary by local authority.
- c. Leaving the scheme as it is in the draft, with such applicants in band two and accorded the same priority as other applicants with a local connection and entitled to reasonable preference.

The draft has in all other matters of content been agreed by partners at the steering group. Presentational aspects may be altered prior to consultation. This will relate in particular to the addition of certain explanatory statements, depending on which of the options above is taken regarding the three outstanding points.

## FAQ regarding SARTH and the CAF

### **1. Who will have priority for social housing?**

*The proposed common allocations framework ensures that applicants who fall within the 'reasonable preference' groups are recognised as being in housing need, and are prioritised for rehousing within the scheme.*

### **2. How do we ensure that local housing issues are addressed?**

*It is proposed that local connection criteria be used to target housing stock in each local authority area at people with a local connection to that local authority. This will be done within the legislative framework, ensuring that over all, preference is given to all applicants entitled to reasonable preference. Within applicants entitled to reasonable preference, priority will be given to those with local connection.*

*An equality impact assessment will be undertaken to ensure that the allocation scheme in its totality does not have an adverse impact on any sections of the community.*

### **3. Should we incorporate sanctions to exclude people from social housing/ suspend applications? If so what sanctions will we wish to apply?**

*The majority of organisations in the partnership currently make provision to exclude people from social housing or reduce the preference they may be given. The proposed approach continues to make such provision, so that certain applicants are ineligible for social housing. It is also proposed that in certain circumstances, where applicants have engaged in behaviour affecting their suitability to be a tenant, they may be given reduced priority. This approach takes into account the Code of Guidance, legislation and good practice and may be further refined following stakeholder feedback.*

### **4. How will we allocate our social housing – will we use Choice based lettings, A points based system or a banding system?**

*The proposal is that a banding system be adopted. This is held to be more appropriate as a means of managing customer expectations, providing fairness and transparency and clearly identifying those who have no demonstrable housing need.*

**5. How can we manage customer expectations and provide timely and consistent advice on housing options?**

*In developing a common approach it is proposed that systems are put in place to provide early and personalised advice on housing options, including those for customers with support needs*

*Further work will be undertaken as part of the SARTH project to identify opportunities for an integrated route to other housing options such as intermediate housing and low cost homeownership. The use of accessible housing registers will also be considered as part of this process.*

**6. What methods of communication can we use in order to maximise customer satisfaction, and ensure value for money?**

*The consultation process will seek views from potential customers and other stakeholders regarding an approach to communicating with customers. The project team will develop an approach based on best practice and feedback from stakeholders. The feasibility study carried out by Glyndwr University suggested that a best practice approach could be achieved through a combination of telephone interviews and personal interviews supported through an online system.*

**7. Who will manage and administer the waiting list and provide advice to customers?**

*It is too early to make detailed recommendations. The approach will be scoped by members of the project team and developed in partnership with stakeholders. Possible IT implementations will also be investigated.*

**8. What methods will we use to engage with and involving local communities in further developing the common allocation framework and associated procedure?**

*It is recommended that consultation with key stakeholders (including current staff involved in allocations and advice) is undertaken following agreement by the project steering group on the draft common allocations framework. Suggested methods are electronic consultation supplemented with focus group meetings, stakeholder workshops and interested customer panels*