Consultation Report

Housing allocations and support for people in housing need

Consultation Report

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Introduction

As part of the Council's commitment to manage the rising demand for social homes in the borough, we are reviewing how we allocate these homes to make sure that the scheme is as fair and effective as possible. The aim is to make the allocations scheme fairer, easier to understand and easier to use.

Background

44% of Hackney residents live in social housing, provided by either the Council or a social landlord such as a housing association. The majority of social rent homes in the borough are offered by Hackney Council to households on the Council's housing register, with applicants and tenants able to bid for homes that are available.

More than 13,000 households are currently on this list, including those without a suitable place to live and those whose social rent home doesn't meet their needs looking to transfer. This number has risen continually in recent years as finding an affordable place to live in the borough has become more and more difficult.

As demand has grown and supply shrunk, the Council's allocations system has increasingly struggled to meet the needs of the people it is there to help. This system was designed when the number of homes for social rent was double that of today, and when fewer people were in need of social housing.

While everyone who joins the housing register has a level of housing need, households are currently able to join even if they don't have a reasonable chance of receiving a home for social rent. With 11,000 bids received for every 100 homes that become available, thousands of households put time, effort and emotional energy into their search for a home, often without a realistic chance of benefitting.

Under the current system, residents with the highest priority can also turn down suitable properties, extending the amount of time they wait for a home. The system has also had the unintended consequence of discouraging some people from taking other opportunities to address their housing difficulties, in case it reduces their priority.

This system has created a huge operational challenge, with an ever-growing register requiring resources to manage as the number of enquiries, complaints, review requests and legal challenges increases despite fewer homes being allocated. We think that these can be better spent providing proactive support to those in housing need.

We want to create a simpler, more transparent housing register, better suited to the situation in Hackney today. At a time of increasing demand and reduced supply, the Council must ensure that the limited stock of social housing that becomes available goes to those in greatest need while also investing in advice and support for all those unlikely to access a home through the housing register.

We are proposing the following changes to the allocations policy:

- Only those with the greatest need (statutorily overcrowded households, significant medical need, or significant social need) would be eligible to join the register.
- Reducing the number of bands from five to three.
- Removing the names of the bands and instead naming them A, B and C.
- Increased support and advice to access alternative accommodation.
- Reducing the number of times that a non-homeless household can refuse a suitable offer.

Methodology

The consultation was carried out online using Citizen Space. The 13,400 households on the housing register were sent a postal letter inviting them to take part in the consultation. The letter also outlined how they could request a hard copy of the consultation pack. Letters were hand delivered in the Council's temporary accommodation hostels for homeless households.

48 consultation packs were sent out by post, including a Turkish translation requested by a resident. One hard copy of the survey was returned.

A dedicated telephone number was made available for advice and discussion purposes.

*Online drop-in sessions and telephone engagement were introduced as a result of the social distancing measures in place in response to the coronavirus pandemic.

Four online sessions were held on:
- Session 1: Tuesday 12 January 2021, 7pm–8.30pm
  - 80 registered participants
- Session 2: Wednesday 27 January 2021, 12 noon–1.30pm
  - 76 registered participants
- Session 3: Tuesday 9 February 2021, 6pm–7.30pm
  - 44 registered participants
- Session 4: Wednesday 24 February 2021, 4.30pm–6pm
  - 30 registered participants

(See page 52 for details)

Respondents

A total of 387 respondents took part in this consultation.

The error level at 95% confidence is **+/-4.9%**. This is within our 5% tolerance level for accuracy and representation of the survey results.

+/-4.9% confidence means that if we were to carry out the same survey 100 times but with different groups of people, we would expect to get around the same results with a 90.1% to 99.9% accuracy each time.

Executive summary

- **Do you agree or disagree that social housing should be allocated to those most in need? (Base 387)**
  - The majority of respondents, at just over two thirds, stated that they "agree" that social housing should be allocated to those most in need (270 - "Strongly agree" and "Agree" combined).
- **Do you agree or disagree that the current system needs to change? (Base 381)**
  - The majority of respondents, at just under two thirds, stated that they "agree" that the current system needs to change (237 - "Strongly agree" and "Agree" combined).
- **Do you agree or disagree with the proposal to replace the current five band register with a new three band register? (Base 379)**
  - This question received a mixed response from respondents, with a **-4.4%** difference between those who "disagree" (176 - "Strongly disagree" and "Disagree" combined) and those who "agree" (159 - "Strongly agree" and "Agree" combined).
- **Do you agree or disagree that the new register should include those with the greatest level of need (overcrowding, medical and social)? (Base 379)**
  - The majority of respondents stated that they "agree" that the new register should include those with the greatest level of need (270 - "Strongly agree" and "Agree" combined).
- **Do you think it is reasonable to reduce the number of times that a non-homeless household can refuse an offer from three to two? (Base 387)**
  - This question received a mixed response from respondents, with a -3.4% difference between those who stated "No" (165) and those who stated "Yes" (151).
- **Do you agree or disagree that access to these services would benefit those who do not qualify to join the register? (Base 387)**
  - This question received a mixed response from respondents, with a **+9.9%** difference between those who "agree" (169 - "Strongly agree" and "Agree" combined) and those who "disagree" (133 - "Strongly disagree" and "Disagree" combined).
- **Do you have any other comments or suggestions?**
  - Top 3 key themes:
    - More social housing needed/unaffordability of non-social housing/pushing people into poverty. Gentrification/new house building is not affordable/pushing people out of area (83)
    - Unfair/complex system/suggestions of who should be prioritised (68)
    - Bidding system/waiting time (51)
- **Are you currently on the housing register? (Base 377)**
  - Over half of all respondents, at just under 54%, who took part stated that they are currently on the housing register (203). Just over 46% stated that they are not (174).

Overview of results

Do you agree or disagree that social housing should be allocated to those most in need? (Base 387)
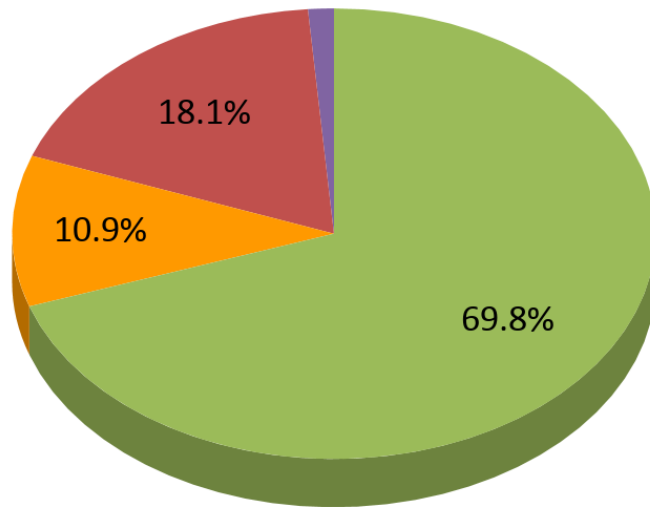
● (270) Agree   ● (42) Neutral   ● (70) Disagree   ● (5) Don't know

The majority of respondents, at just over two thirds, stated that they "agree" that social housing should be allocated to those most in need (270 - "Strongly agree" and "Agree" combined).

Just over 18% stated that they "disagree" (70 - "Strongly disagree" and "Disagree" combined), with just under 11% stating a "neutral" response (42), and just over 1% stating "Don't know" (5).

Cross-analysis - "Do you agree or disagree that social housing should be allocated to those most in need?" vs "Are you currently on the housing register?" (Base 377)
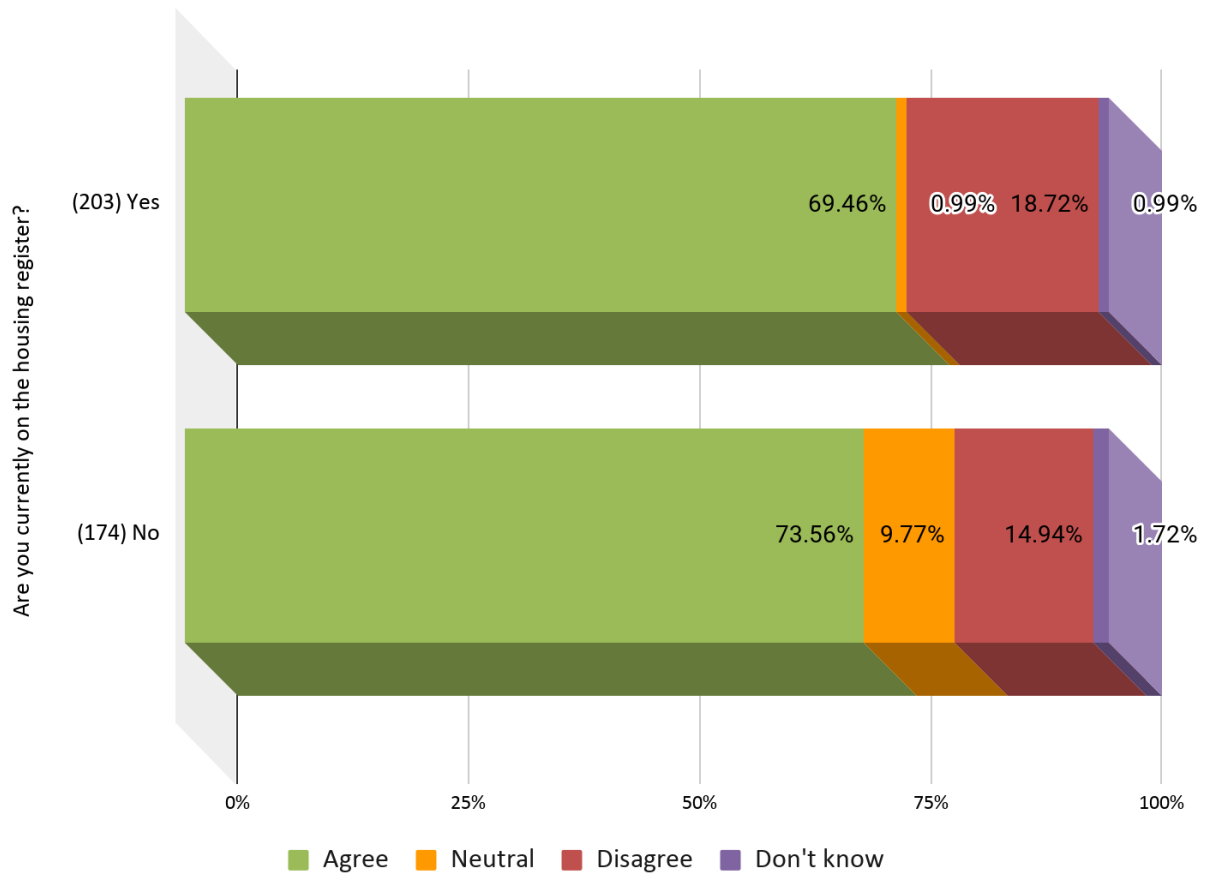
The chart above represents the views of respondents who are and are not on the housing register, by whether they agree or disagree that social housing should be allocated to those most in need.

The majority of respondents, both those who stated "Yes" and "No" to being on the housing register, agree with this statement (141 "Yes" and 128 "No").

A smaller proportion of respondents disagree with this statement (38 "Yes" and 26 "No").

Cross-analysis - "Do you agree or disagree that social housing should be allocated to those most in need?" vs "Ethnicity" (Base 341)

The chart above represents the views of respondents by their ethnic group and whether they agree or disagree that social housing should be allocated to those most in need.

The majority of respondents across all ethnic groups "agree" with the statement.   On average across all ethnic groups, there is a 72.97% "agree" response.

"Black or Black British" accounted for the highest percentage "disagree" (18 of 92), followed by "White or White British" (22 of 131), "Asian or Asian British" (7 of 42), "Mixed background" (4 of 26) and "Other ethnic group" (7 of 49).

Cross-analysis - "Do you agree or disagree that social housing should be allocated to those most in need?" vs "Disability" (Base 371)

The chart above represents the views of respondents by whether they have a disability and whether they agree or disagree that social housing should be allocated to those most in need.

The majority of respondents of those who stated "Yes" and "No" to having a disability "agree" with the statement.

Do you agree or disagree that the current system needs to change? (Base 381)
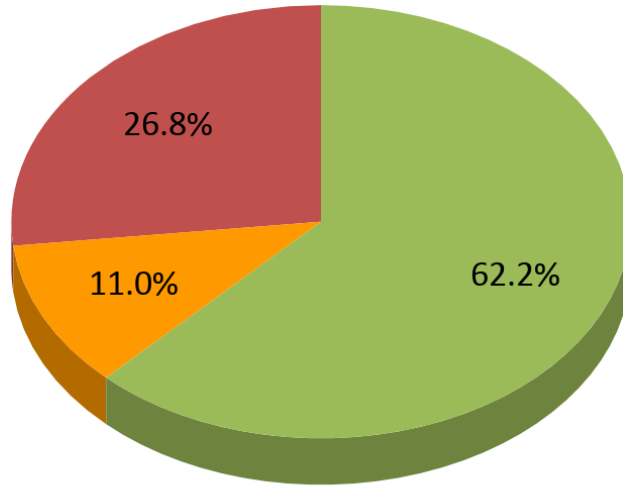
● (237) Agree ● (42) Neutral ● (102) Disagree

26.8%

11.0%

62.2%

The majority of respondents, at just under two thirds, stated that they "agree" that the current system needs to change (237 - "Strongly agree" and "Agree" combined). Just over a quarter of respondents stated "disagree" (102 - "Strongly disagree" and "Disagree" combined), with 11% stating a "neutral" response (42).

Cross-analysis - "Do you agree or disagree that the current system needs to change?" vs "Are you a:" - DISAGREE ONLY (Base 97)

Category	Percentage
(23) Full time worker	23.71%
(14) Family with one or two dependent children	14.43%
(12) Part time worker	12.37%
(9) Family with three or more dependent children	9.28%
(9) Lone parent household	9.28%
(9) Pensioner	9.28%
(7) Single person	7.22%
(5) Someone who is disabled	5.15%
(4) Student	4.12%
(3) Other (please specify)	3.09%
(2) Carer	2.06%

The chart above looks at the breakdown by profile/characteristics of those who "disagree" that the current system needs to change. 97 respondents answered both questions in the consultation.

The top 4 key themes mentioned in their comments was regarding:

- More social housing needed/unaffordability of non-social housing/pushing people into poverty. Gentrification/new house building is not affordable/pushing people out of area
- Unfair/complex system/suggestions of who should be prioritised
- Bidding system/waiting time
- Should be their own choice to remain on the housing register

These key themes are mentioned on page 23 with a breakdown analysis of all themes from the comments.

If we look at these 4 themes by their ethnicity breakdown, the following is shown (top 2 ethnicity for each theme):

- More social housing needed/unaffordability of non-social housing/pushing people into poverty. Gentrification/new house building is not affordable/pushing people out of area:
  - **White or White British - 49%**
  - Not answered - 15%
- Unfair/complex system/suggestions of who should be prioritised:
  - **Black or Black British - 30%**
  - White or White British - 30%
- Bidding system/waiting time:
  - **Black or Black British - 43%**
  - White or White British - 18%
- Should be their own choice to remain on the housing register:
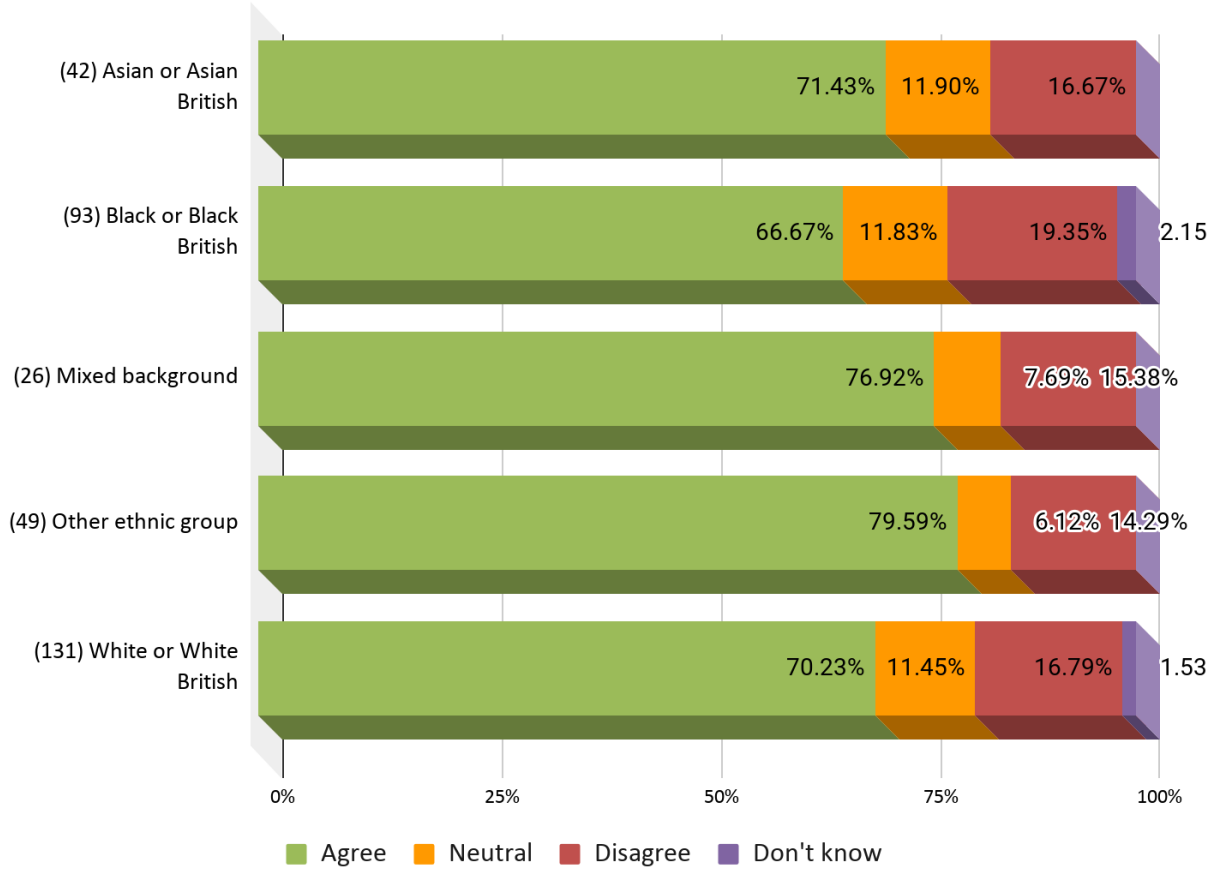 - **Black or Black British - 37%**
  - White or White British - 29%
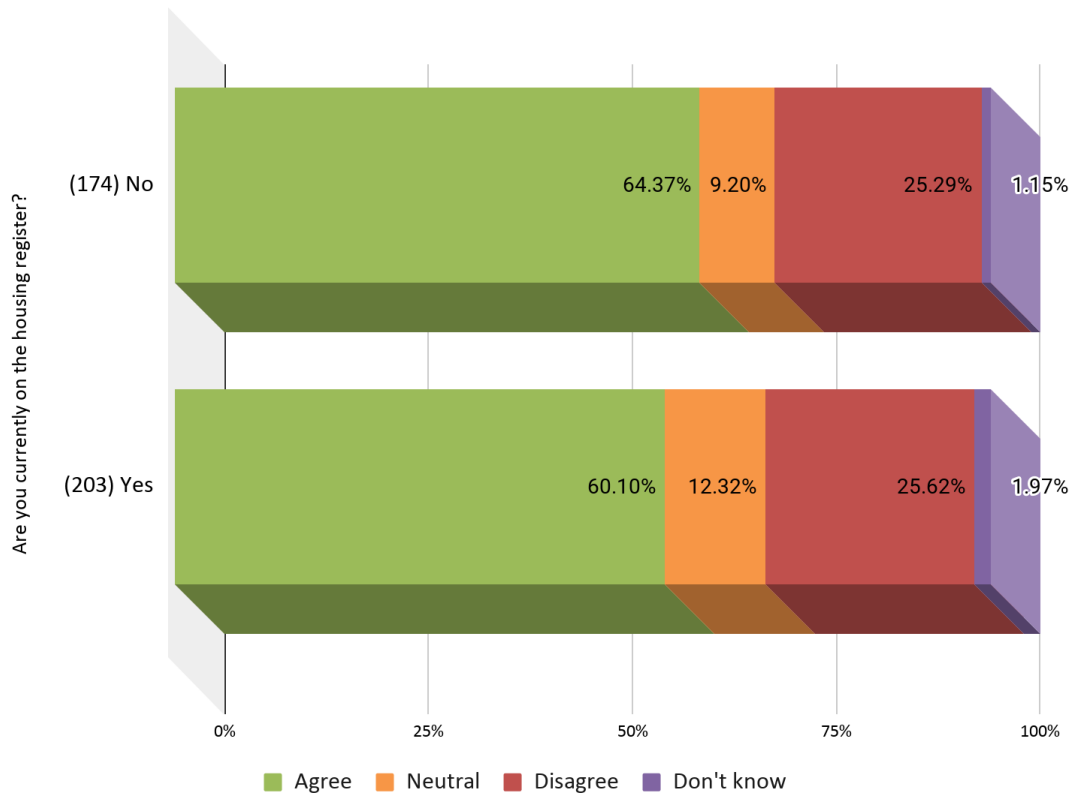
The chart above represents the views of respondents who are and are not on the housing register, by whether they agree or disagree that the current system needs to change.

The majority of respondents, both those who stated "Yes" and "No" to being on the housing register, agree with this statement (122 "Yes" and 112 "No").

A smaller proportion of respondents disagree with this statement (52 "Yes" and 44 "No").
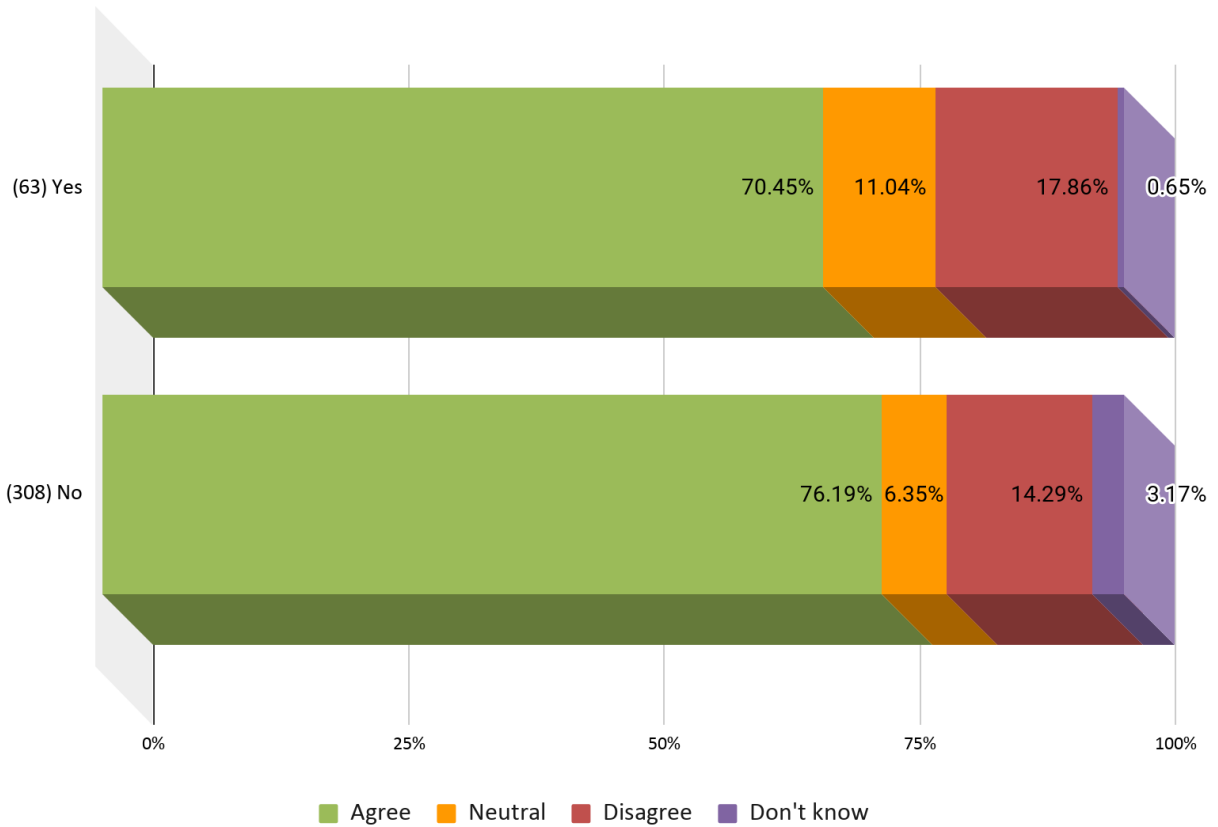
The chart above represents the views of respondents by their ethnic group and whether they agree or disagree that the current system needs to change.

The views are quite varied, although the majority of each ethnic group "agree" with this statement.

"Asian or Asian British" accounts for the lowest "agree" response at 50% (21 of 42).

Based on proportional responses, "White or White British" has the highest number of respondents who "disagree" (31 of 131).

The chart above represents the views of respondents by whether they have a disability and whether they agree or disagree that the current system needs to change.

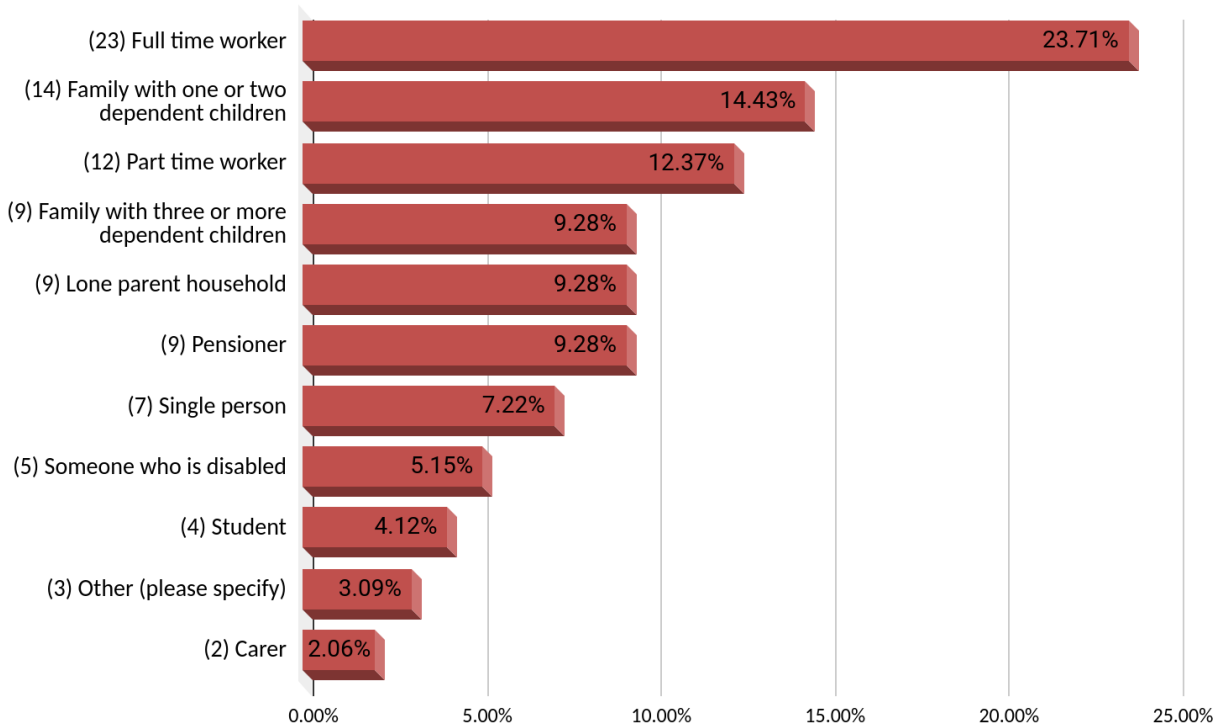The majority of respondents of those who stated "Yes" and "No" to having a disability "agree" with the statement.   A quarter of respondents for each group "disagree" with the statement.

Do you agree or disagree with the proposal to replace the current five band register with a new three band register? (Base 379)

46.4%

42.0%

11.6%

● (159) Agree   ● (44) Neutral   ● (176) Disagree
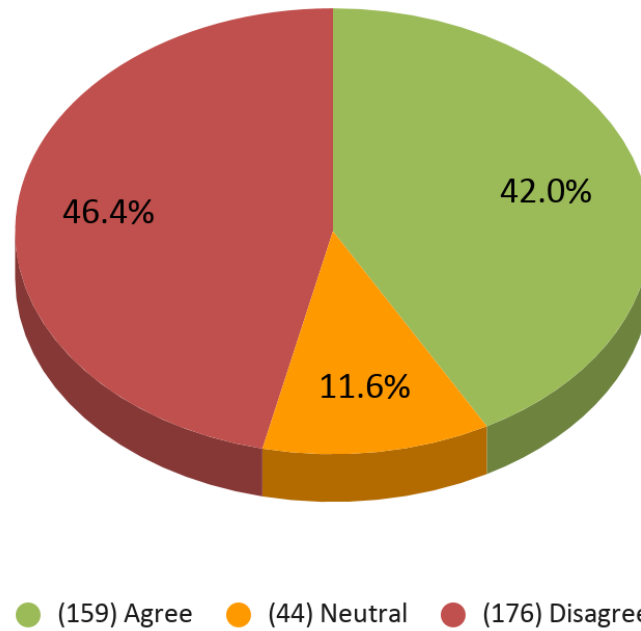
This question received a mixed response from respondents, with a **-4.4%** difference between those who "disagree" (176 - "Strongly disagree" and "Disagree" combined) and those who "agree" (159 - "Strongly agree" and "Agree" combined). Just under 12% stated a "neutral" response (44).

Cross-analysis - "Do you agree or disagree with the proposal to replace the current five band register with a new three band register?" vs "Are you currently on the housing register?" (Base 377)

The chart above represents the views of respondents who are and are not on the housing register, by whether they agree or disagree with the proposal to replace the current five band register with a new three band register.

There is a mixed view for this question, which shows a slightly higher "disagree" than "agree" response for those who are not on the housing register (**-5.18%** difference), and a very minimal difference between "agree" and "disagree" for those who are on the housing register (**-1.48%** difference).

Cross-analysis - "Do you agree or disagree with the proposal to replace the current five band register with a new three band register?" vs "Ethnicity" (Base 341)
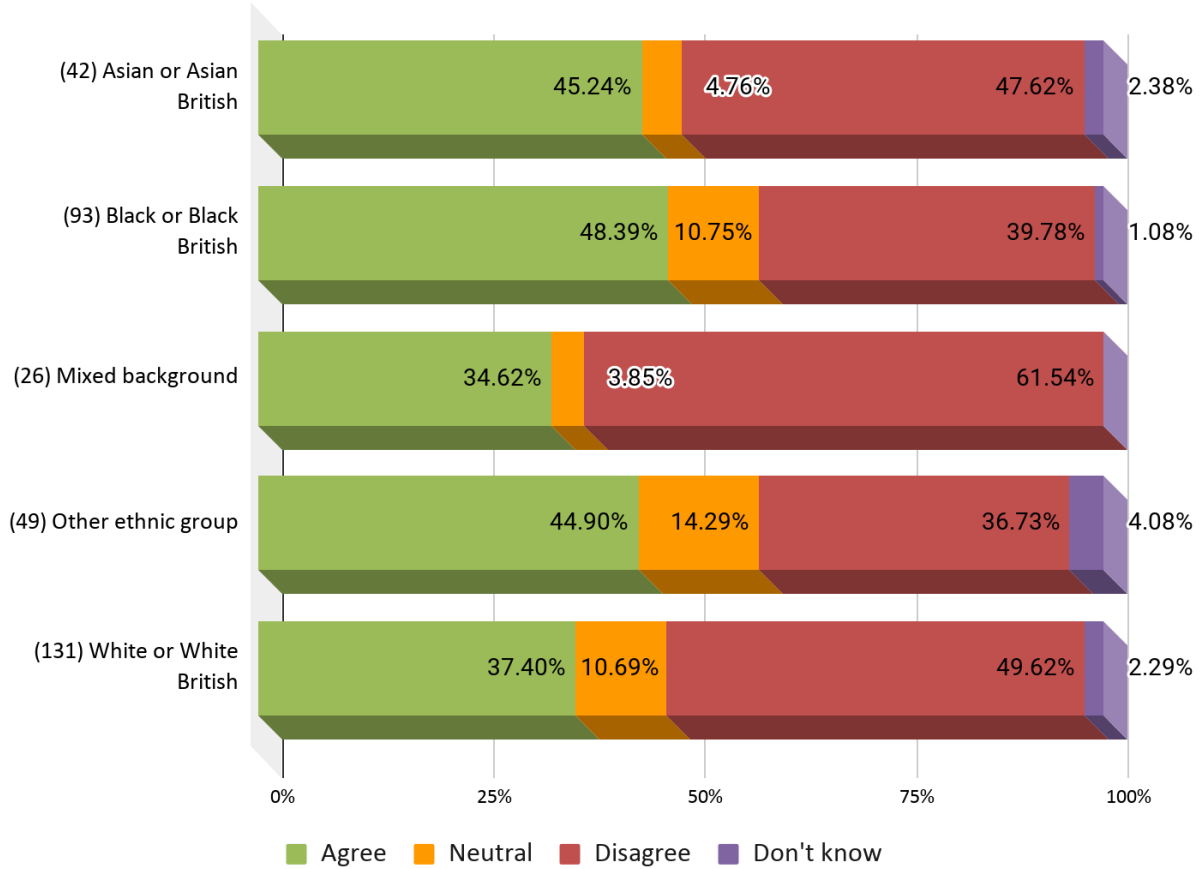
The chart above represents the views of respondents by their ethnic group and whether they agree or disagree with the proposal to replace the current five band register with a new three band register.

The majority of each ethnic group stated that they "disagree" with this statement.

"Mixed background" had the highest percentage "disagree" (16 of 26), but based on proportional responses "White or White British" would have the highest number of respondents who "disagree" (65 of 131).
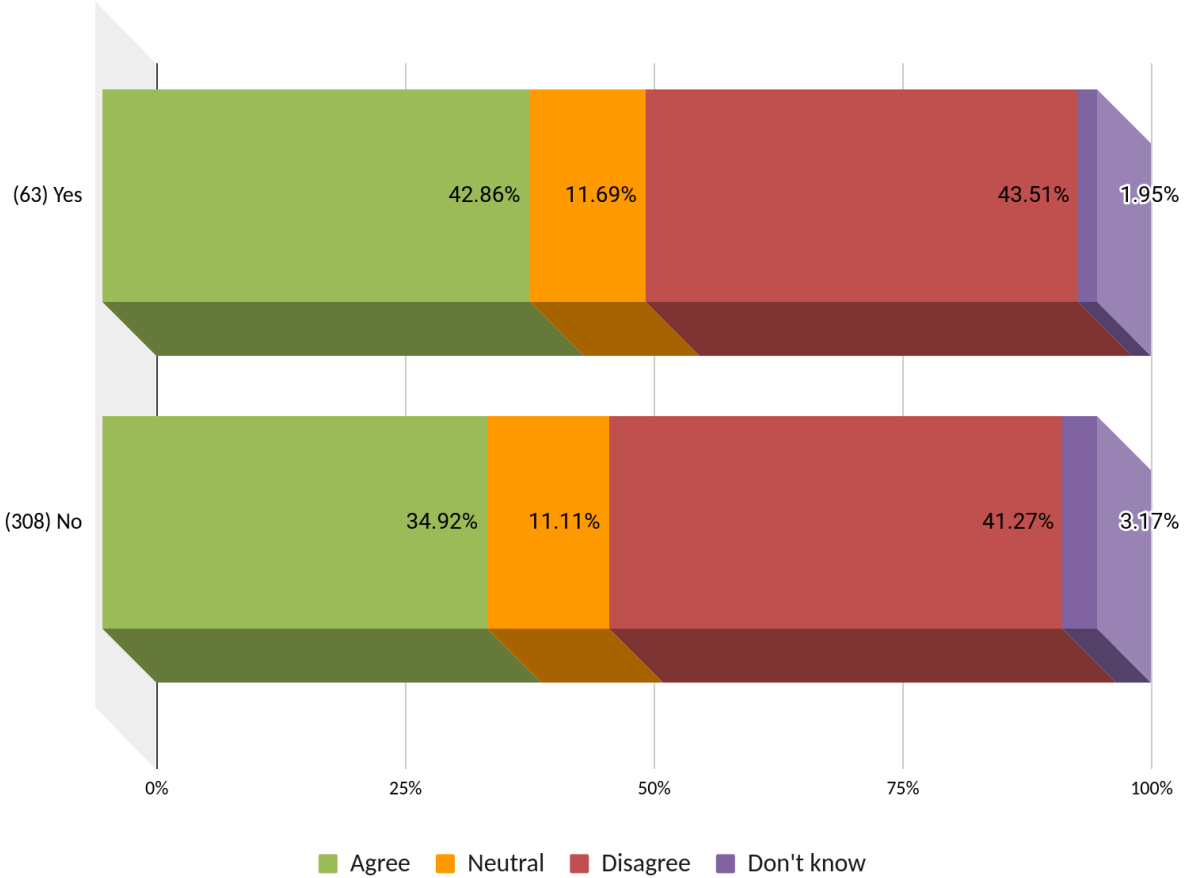
The chart above represents the views of respondents by whether they have a disability and whether they agree or disagree with the proposal to replace the current five band register with a new three band register.

There is a mixed view for this question, which shows a very minimal difference between the "agree" and "disagree" response for those who stated they have a disability (**-0.68%** difference), and a higher difference between "agree" and "disagree" for those who stated they do not have a disability (**-6.38%** difference).

Do you agree or disagree that the new register should include those with the greatest level of need (overcrowding, medical and social)? (Base 379)

17.4%

11.3%

71.2%
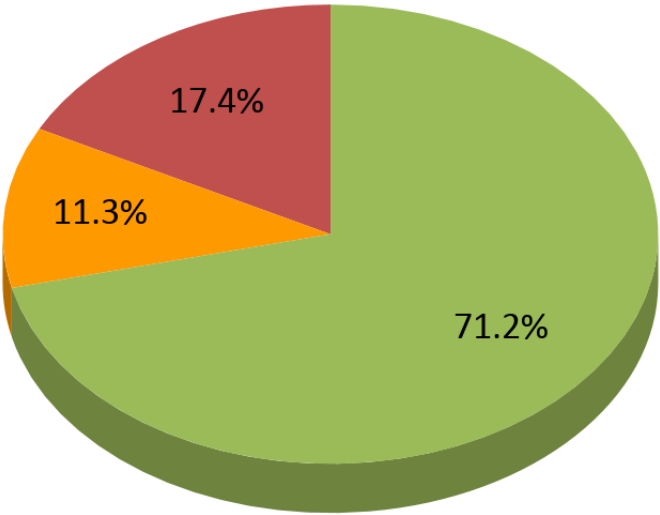
● (270) Agree   ● (43) Neutral   ● (66) Disagree

The majority of respondents stated that they "agree" that the new register should include those with the greatest level of need (270 - "Strongly agree" and "Agree" combined). Just over 17% stated "disagree" (66 - "Strongly disagree" and "Disagree" combined), with just over 11% stating a "neutral" response (43).
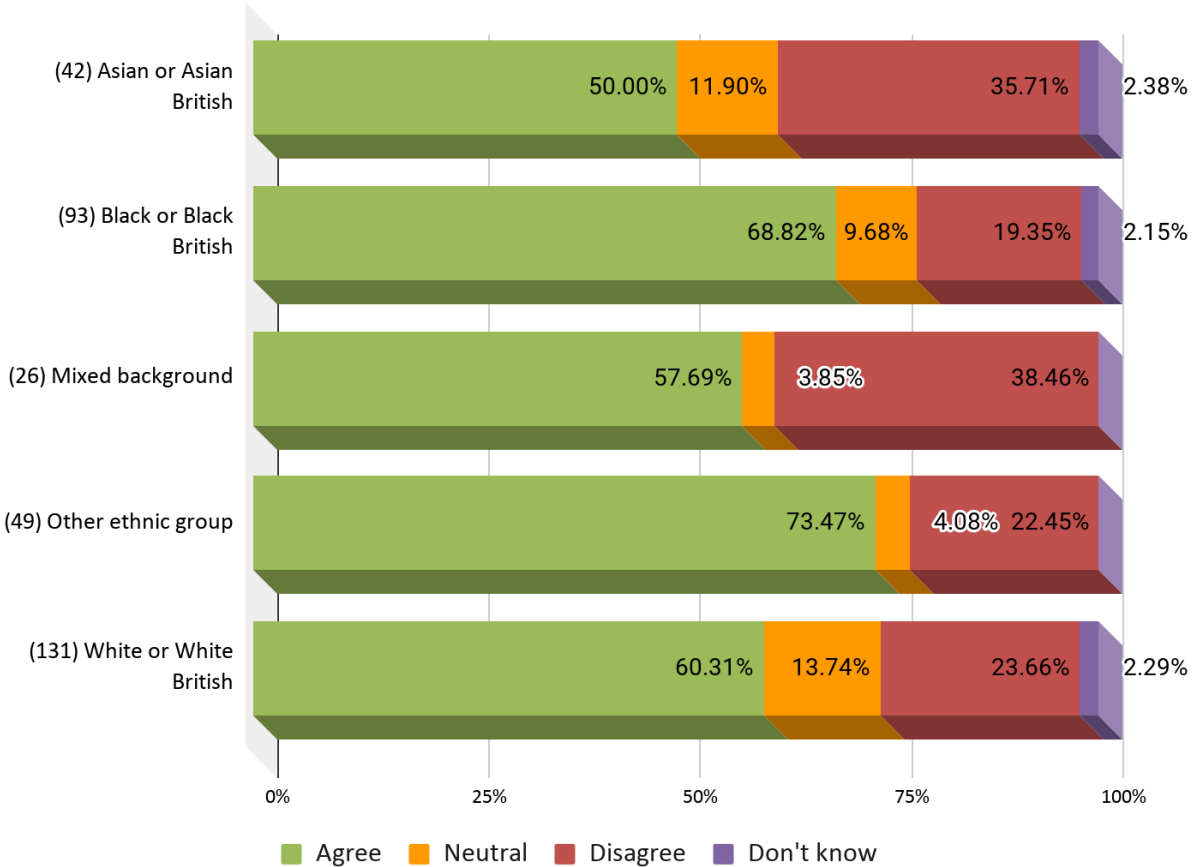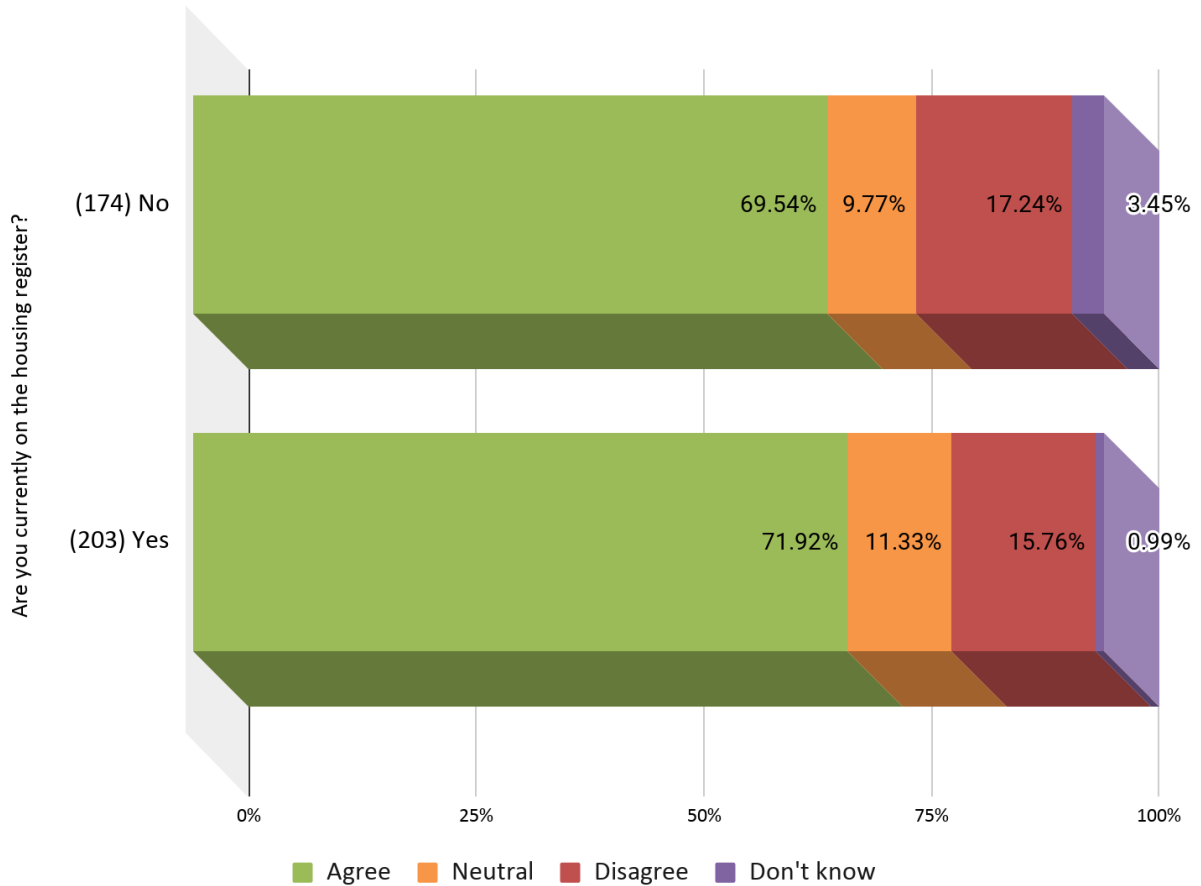
The chart above represents the views of respondents who are and are not on the housing register, by whether they agree or disagree that the new register should include those with the greatest level of need (overcrowding, medical and social).

The majority of respondents, both those who stated "Yes" and "No" to being on the housing register, agree with this statement (146 "Yes" and 121 "No").

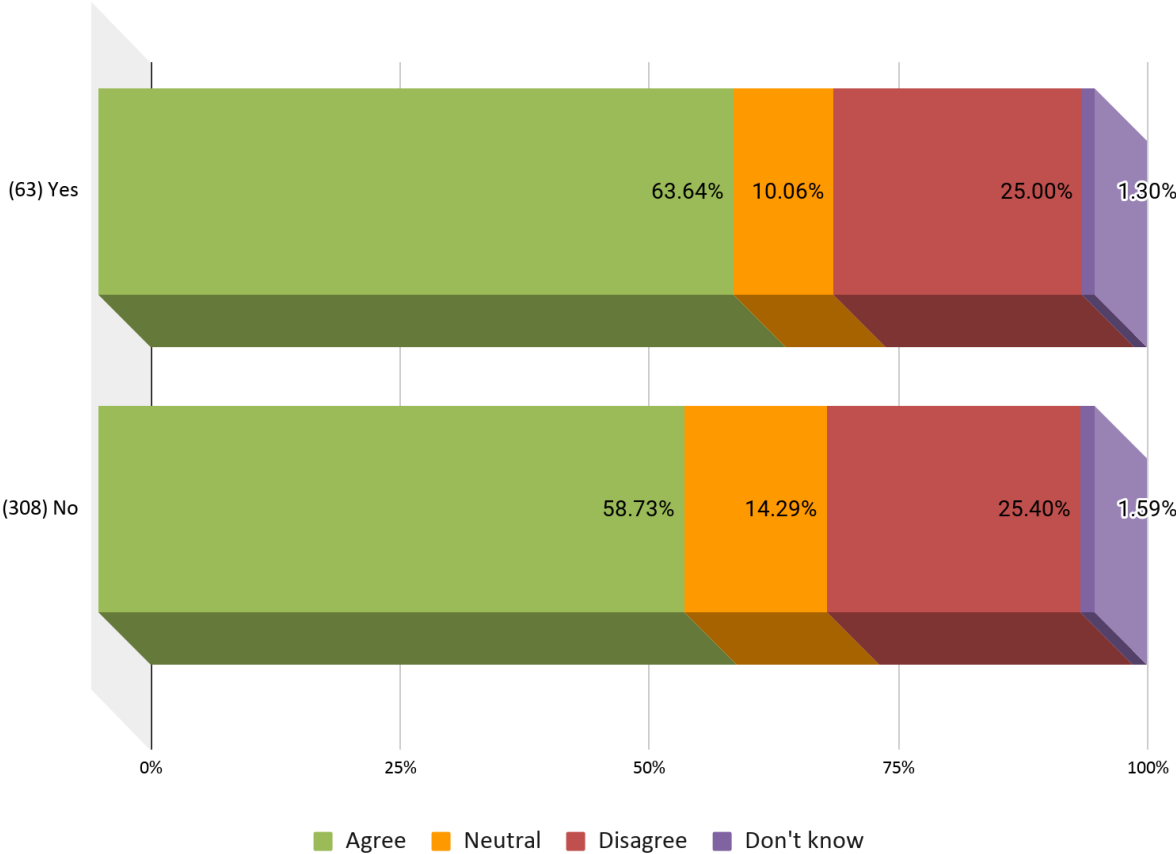A smaller proportion of respondents disagree with this statement (32 "Yes" and 30 "No").

The chart above represents the views of respondents by their ethnic group and whether they agree or disagree that the new register should include those with the greatest level of need (overcrowding, medical and social).

The majority of respondents across all ethnic groups "agree" with the statement. On average across all ethnic groups, there is a 71.39% "agree" response.

"Asian or Asian British" accounted for the highest percentage "disagree" (9 of 42), followed by "Black or Black British" (18 of 92), "Other ethnic group" (9 of 49), "Mixed background" (4 of 26), and "White or White British" (17 of 131).
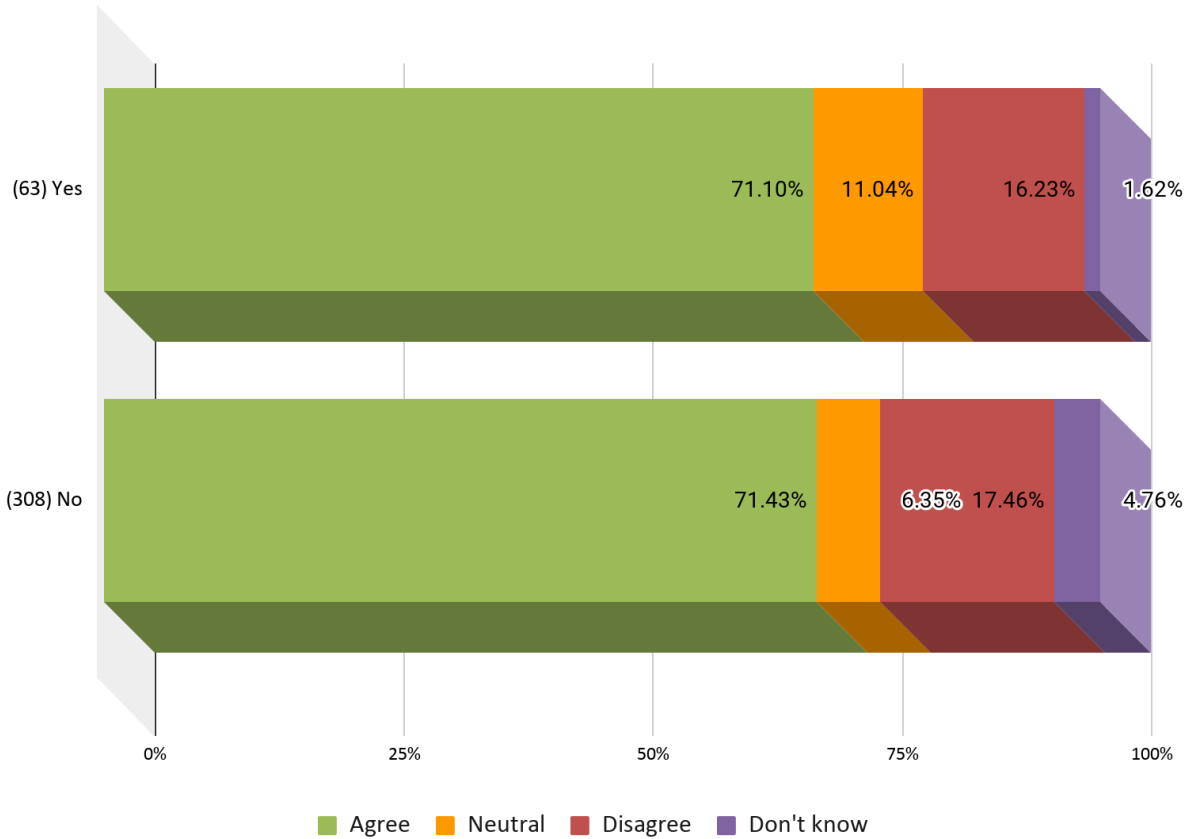
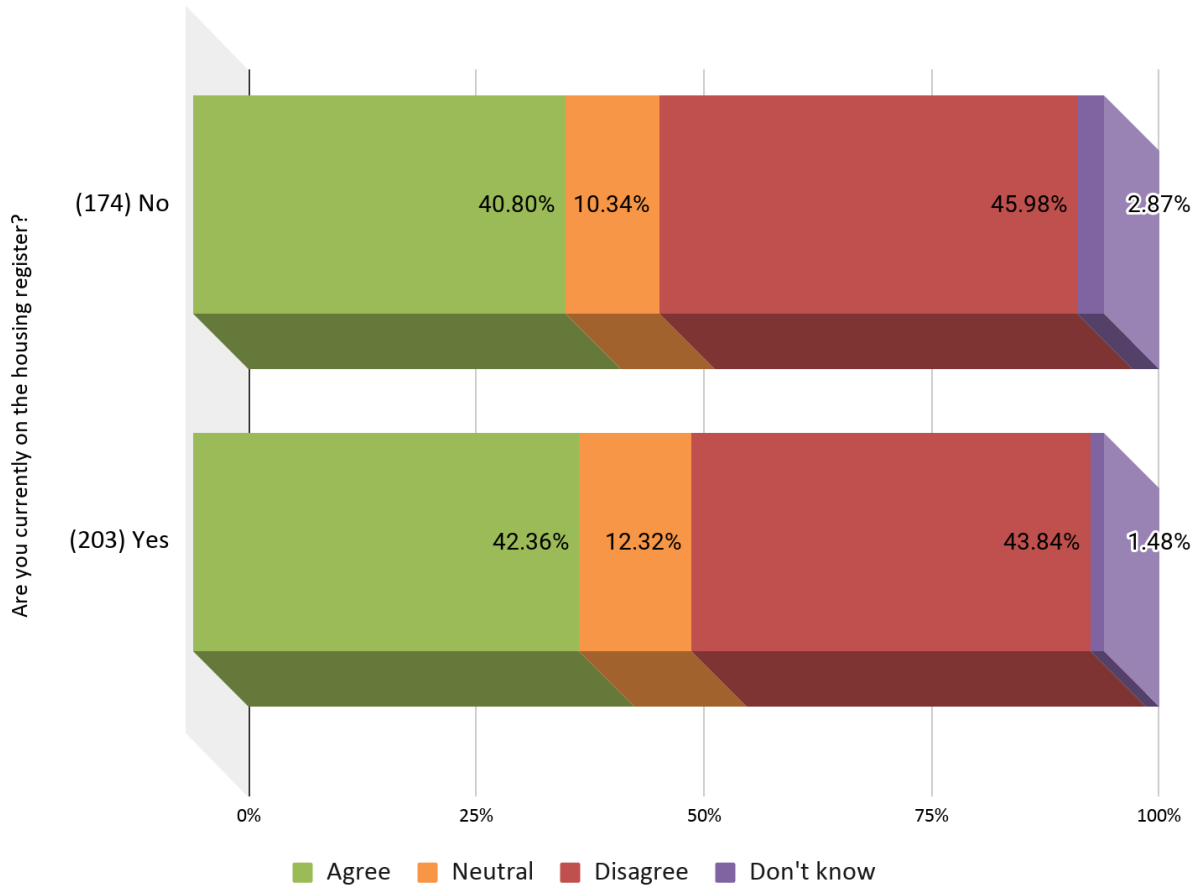The chart above represents the views of respondents by whether they have a disability and whether they agree or disagree that the new register should include those with the greatest level of need (overcrowding, medical and social).

The majority of respondents of those who stated "Yes" and "No" to having a disability, at almost three quarters, "agree" with the statement. A much smaller percentage "disagree" with the statement.

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Do you think it is reasonable to reduce the number of times that a non-homeless household can refuse an offer from three to two? (Base 387)
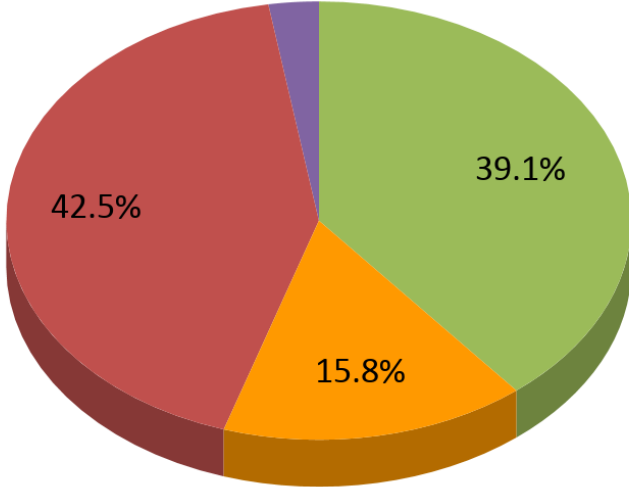
● (151) Yes　● (61) Neutral　● (165) No　● (10) Don't know

This question received a mixed response from respondents, with a **-3.4%** difference between those who stated "No" (165) and those who stated "Yes" (151). Just under 16% stated a "neutral" response (61), with just under 3% stating "Don't know" (10).

Cross-analysis - "Do you think it is reasonable to reduce the number of times that a non-homeless household can refuse an offer from three to two?" vs "Are you currently on the housing register?" (Base 377)
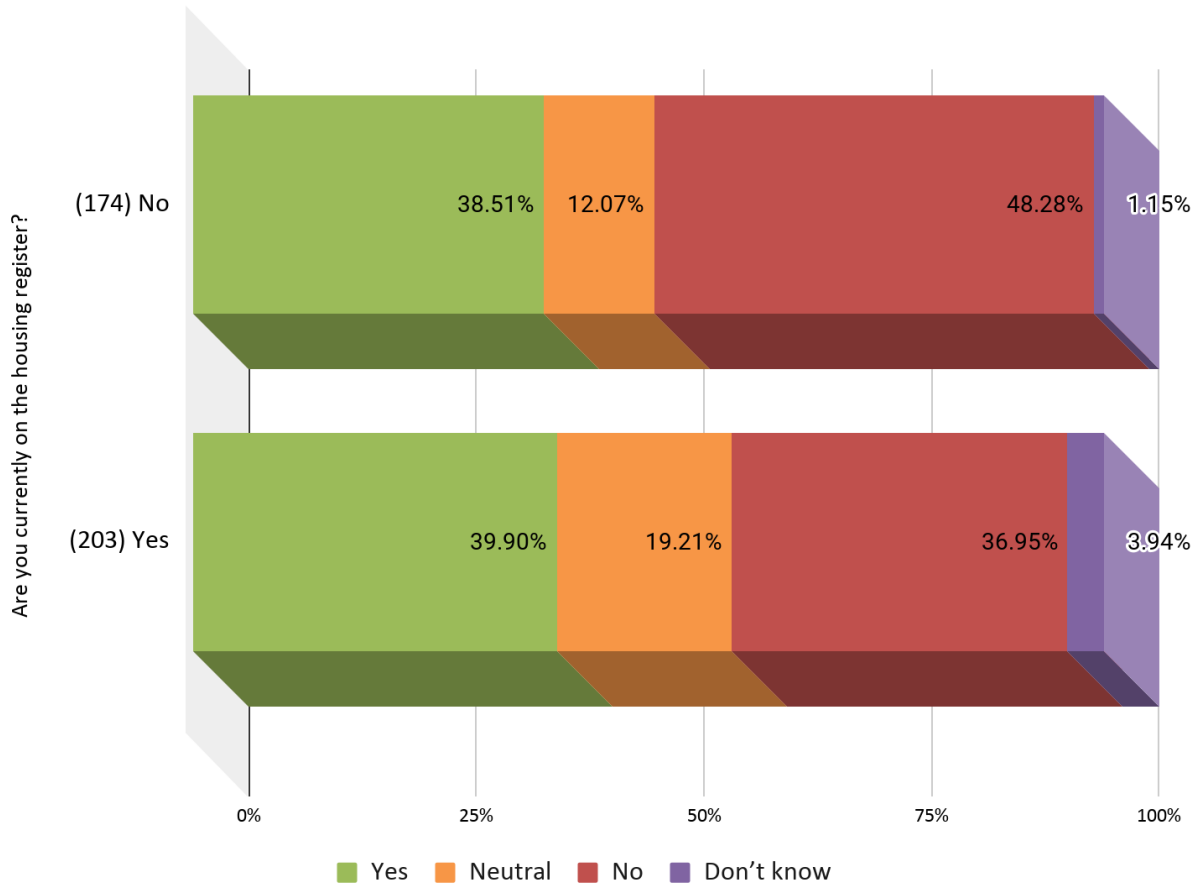
The chart above represents the views of respondents who are and are not on the housing register, by whether they think it is reasonable to reduce the number of times that a non-homeless household can refuse an offer from three to two.

There is a mixed view for this question, which shows a slightly higher "disagree" than "agree" response for those who are not on the housing register (**-9.77%** difference), a slightly higher "agree" than "disagree" response for those who are on the housing register (**+2.95%** difference).

Cross-analysis - "Do you think it is reasonable to reduce the number of times that a non-homeless household can refuse an offer from three to two?" vs "Ethnicity" (Base 341)
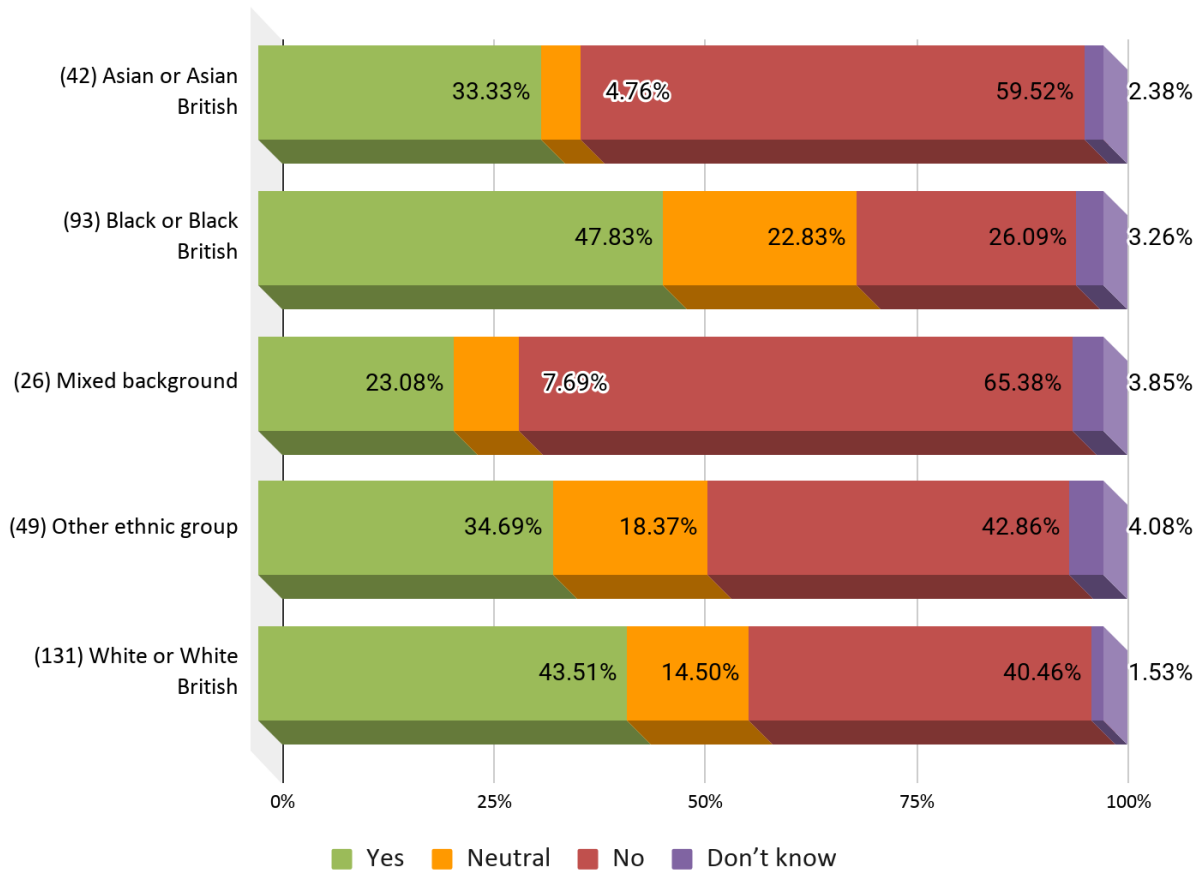
The chart above represents the views of respondents by their ethnic group and whether they think it is reasonable to reduce the number of times that a non-homeless household can refuse an offer from three to two.

With the exception of "Black or Black British", across all other ethnic groups there was an average majority "No" response of 52.06%.

"Black or Black British" had a close to majority "Yes" response (44 of 92), with just under 23% "Neutral" (21 of 92) and just over a quarter "No" response (25 of 92). Only 3 respondents stated "Don't know".
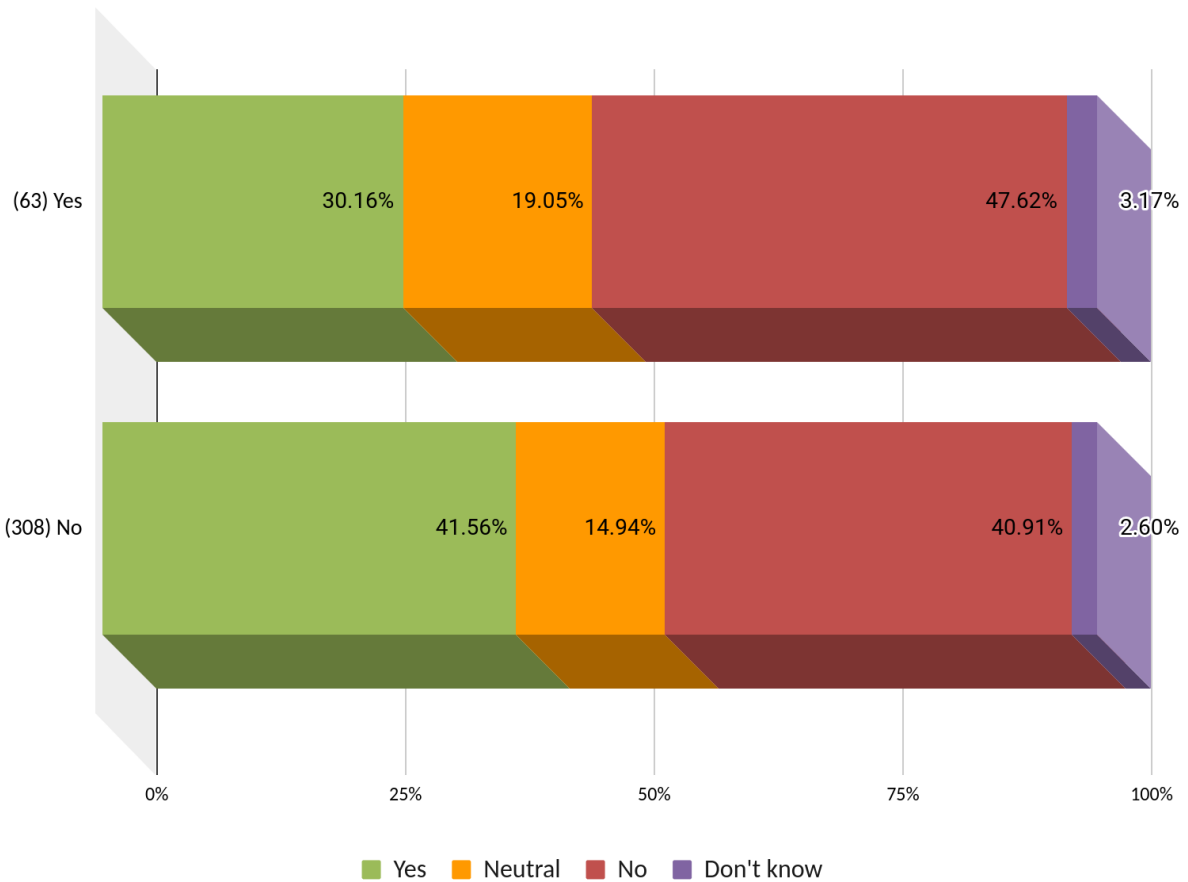
The chart above represents the views of respondents by whether they have a disability and whether they think it is reasonable to reduce the number of times that a non-homeless household can refuse an offer from three to two.

There is a mixed view for this question, which shows a fairly significant difference between the "agree" and "disagree" response for those who stated they have a disability (**-17.46%** difference), and a very minimal difference between "agree" and "disagree" for those who stated they do not have a disability (**0.65%** difference).

Do you agree or disagree that access to these services would benefit those who do not qualify to join the register? (Base 387)

● (169) Agree   ● (62) Neutral   ● (133) Disagree
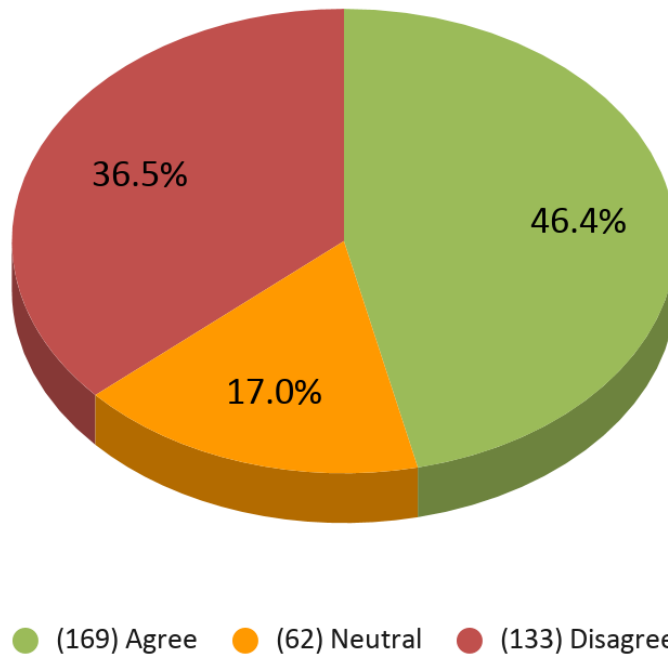
This question received a mixed response from respondents, with a **+9.9%** difference between those who "agree" (169 - "Strongly agree" and "Agree" combined) and those who "disagree" (133 - "Strongly disagree" and "Disagree" combined). 17% stated a "neutral" response (62).
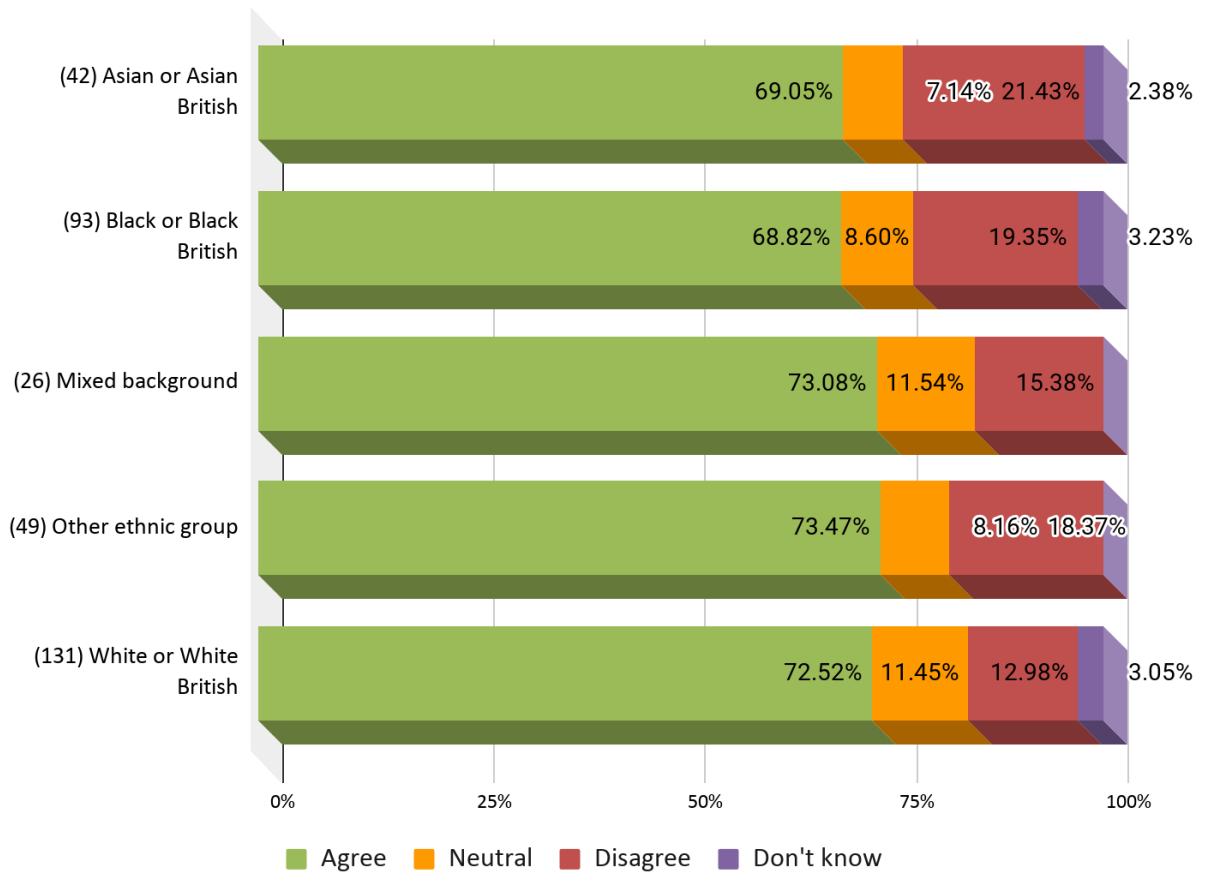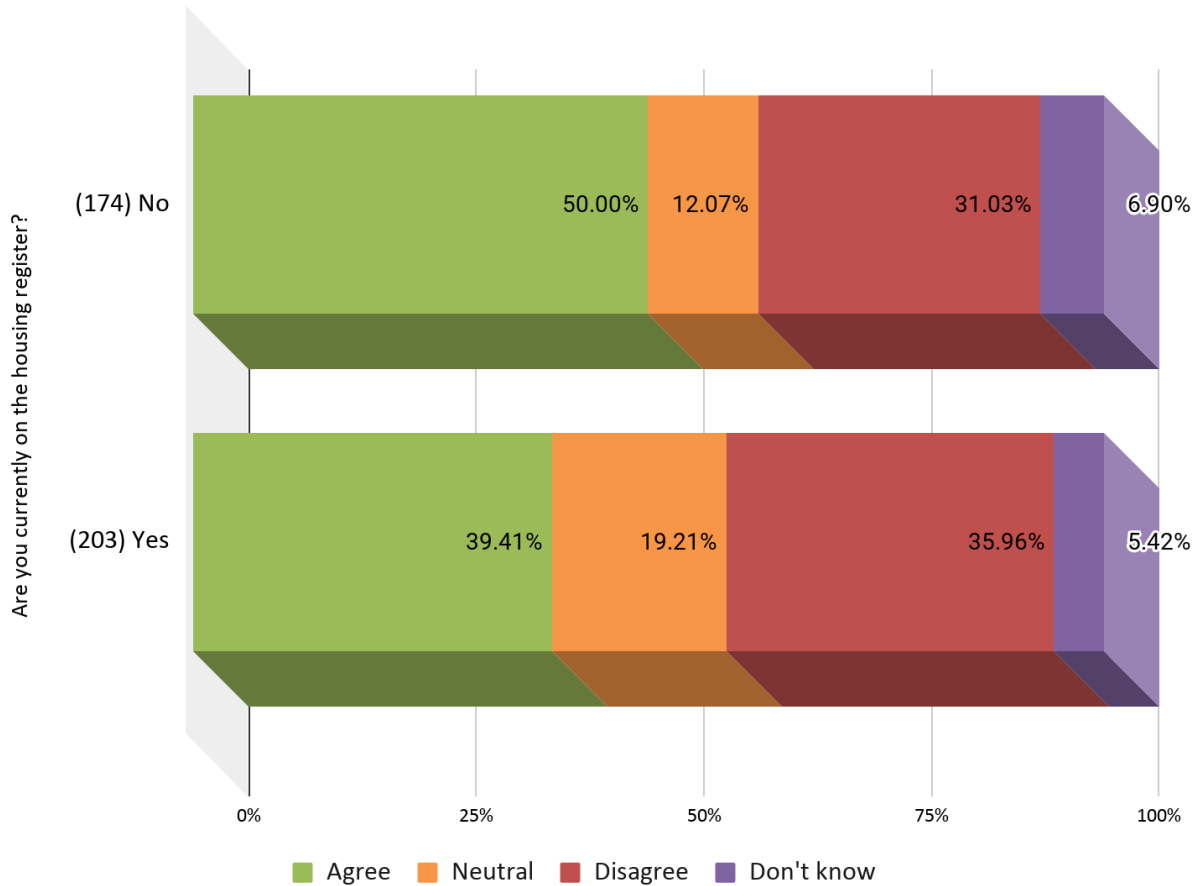
The chart above represents the views of respondents who are and are not on the housing register, by whether they agree or disagree that access to these services would benefit those who do not qualify to join the register.

There is a mixed view for this question, which shows a significant higher "agree" than "disagree" response for those who are not on the housing register (**+18.97%** difference), a slightly higher "agree" than "disagree" response for those who are on the housing register (**+3.45%** difference).
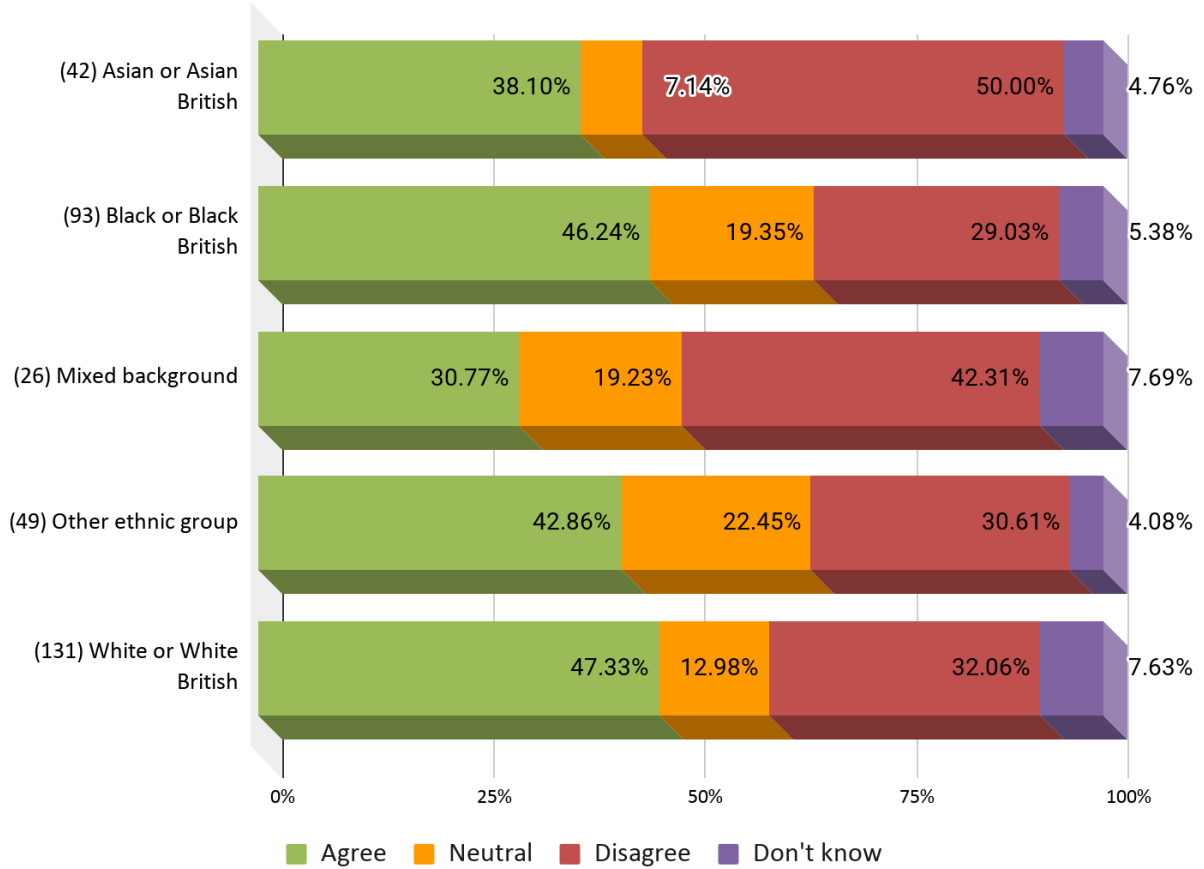
The chart above represents the views of respondents by their ethnic groups and whether they agree or disagree that access to these services would benefit those who do not qualify to join the register.

There was no majority "agree" response across all ethnic groups, with an average of 41.06%. Only "Asian or Asian British" had a majority "disagree" response of 50% (21 of 42).

There was an average of 16.23% across the "neutral" response for all ethnic groups, and 36.80% for "disagree" across all ethnic groups.

Cross-analysis - "Do you agree or disagree that access to these services would benefit those who do not qualify to join the register?" vs "Disability" (Base 371)
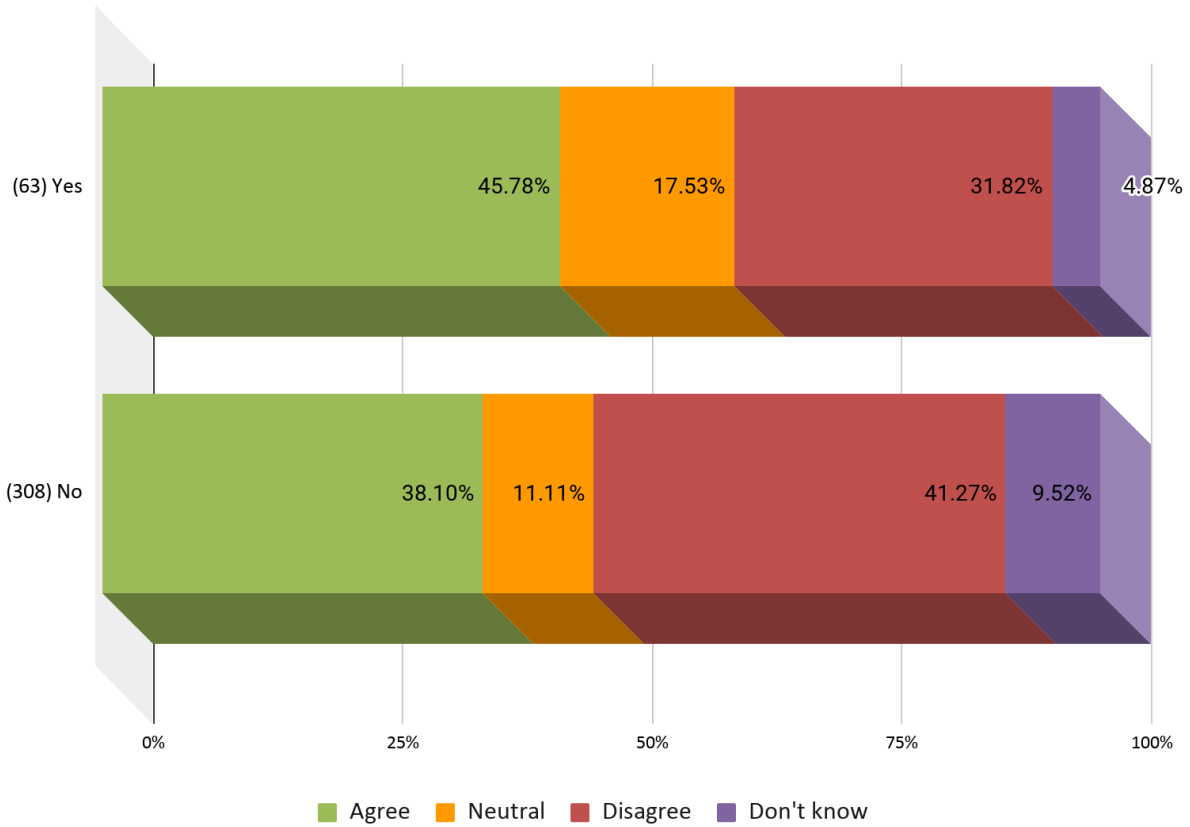
	Agree	Neutral	Disagree	Don't know
(63) Yes	45.78%	17.53%	31.82%	4.87%
(308) No	38.10%	11.11%	41.27%	9.52%

The chart above represents the views of respondents by whether they have a disability and whether they agree or disagree that access to these services would benefit those who do not qualify to join the register.

There is a mixed view for this question, which shows a fairly significant difference between the "agree" and "disagree" response for those who stated they have a disability (**13.96%** difference), and a much smaller difference between "agree" and "disagree" for those who stated they do not have a disability (**-3.17%** difference).

Do you have any other comments or suggestions?

Respondents were given the chance to express any other comments or suggestions that they wanted to tell us. The following key themes came out from the comments:

Key theme	Count
More social housing needed/unaffordability of non-social housing/pushing people into poverty. Gentrification/new house building is not affordable/pushing people out of area	69
Unfair/complex system/suggestions of who should be prioritised	64
More help for those who are not considered 'high enough priority' - overcrowded/opposite sex children needing own rooms/safety in the home/temporary accommodation	49
Bidding system/waiting time	46
Suggestions for other solutions and lobbying for change	29
Look at individual needs	26
Should be their own choice to remain on the housing register	25
Invest more in support to access other housing and better swaps system	23
Consultation - during the pandemic and questions	21
Bands allocation system/change from 5 bands to 3	20
Issues with private rented sector / more regulation needed	20
Should be for everyone/should make it easier not more difficult/right to housing	19
Plans are about making things look better / covering up level of demand	17
Groups that need more consideration - single people/elderly/care leavers/key workers	16
Agree with changes	14
Suggestions about staff	12
Shouldn't extend 'one direct offer' or remove number of times can refuse an offer	12
Concerns about people 'gaming' system and how to prevent this	10
Disproportionate impact on black people in the borough	8
Overlooking those in the middle who don't qualify for social housing but can't afford to rent privately or buy	7
Need to consider those with learning disabilities/mental health issues as well as physical disabilities - impact on waiting times when medical/homeless combined	7
Concerns about how changes will be communicated/impact on LBH reputation	6
Should do this nationally, not as a borough	3
Responsibility for circumstances	3
Shouldn't change system as prospects may improve	2

More social housing needed/unaffordability of non-social housing/pushing people into poverty. Gentrification/new house building is not affordable/pushing people out of area

These comments indicate that the respondents felt that there is not enough social housing available, and the housing that is available is not affordable to local residents, therefore pushing them out of the area.

"Build more social housing! Sites and developments are all over the area with an inadequate number of accommodation for social rents. Help to buy schemes and half rent/half but schemes are still out of the price range of many local people"

"I have every sympathy with the very difficult position the council is in. There are not enough homes for the people in housing need in Hackney. Keeping people on the register who will not ever be placed in the homes they need is not helping them. Any new system of allocations will not prevent the council from doing all it can to create more genuinely affordable housing."

"One of the many reasons that Hackney residents apply to join the register is to attempt to remain living in Hackney as at the moment we are being 'priced out'. Many people, although you may not class them as emergencies, are NOT able to afford to rent privately and so the Hackney register is their ONLY option. By going through with this ill thought through action you will be contributing to the homeless number and the poverty and poor living of many Hackney residents who are unable to access better homes."

"Build more council homes for the ordinary person of Hackney, who works but cannot afford to buy one of the new builds that are springing up in the borough. Stop selling off land to private developers who are not allocating enough homes to social renters."

Unfair/complex system/suggestions of who should be prioritised

These comments indicate that the respondents felt that the system is unfair and/or complex. Many of these respondents also had alternative suggestions of who should be prioritised, including households with medical needs including mental health, those who have lived in Hackney a long time or grown up here, households with people in work or paying taxes, British people, those with established support networks in the borough, and households currently in overcrowded or temporary accommodation.

"Council Housing should be for everyone - and not just the vulnerable. There should be priority for those working and paying taxes who were born in Hackney."

"The council really needs to change and help those all over not just offer houses to those deemed as high priority but to those who are over crowded. Have medical issues, homes in bad repair and so on."

"The private sector is often criticised for not providing enough affordable housing for essential workers, with which I agree. I think that the same principle should apply to social housing and, with some allowance for emergency/urgent cases that affect people's health and welfare, priority should be given to essential workers and their contribution to the community."

More help for those who are not considered 'high enough priority' - overcrowded/opposite sex children needing own rooms/safety in the home/temporary accommodation

These comments represented respondents who felt that the Council should provide more help for residents who are not considered to be in a high enough level of housing need to be prioritised for social housing. These comments mostly related to overcrowded households (especially where there is opposite sex children requiring separate rooms), properties that aren't considered to be safe enough, and those living in temporary accommodation.

"As for myself I am overcrowded and I'm on the housing list bidding for a 4 bed flat but there is no available one right now I've got my son who is asthmatic and my daughter and sons have to be sharing a room which is not appropriate. So I agree with a lot of the changes because people who don't really need some of the space they have are not thinking about people like myself."

"We've been on the Hackney council housing list since our social housing landlord changed management and closed their list - we are overcrowded. We were put in the general band and with no option to boost in our priority through social or medical need, we are in fact stuck. The current system is complicated and confusing and I've struggled to navigate the options to transfer to a bigger home given that most of the options presented through the various sites linked to the Hackney system preclude us due to our circumstances. I would very much appreciate constructive advice and guidance and also understand that this new system may mean we are no longer eligible to be housed even though it's inappropriate for my son to be sharing a room with his mum."

"People who are living in an overcrowded house with health conditions should be in Priority. Whilst I have both, I should not be in general, I should be in priority/urgent."

"The definition of 'need' should include the needs of the wider community, not just of the applicants' needs. Social housing should not just be for those individuals who need support, but consideration should also be given to what those people contribute to local and wider society. The council should be doing more to actively manage its stock of housing, to identify where tenants are 'under crowded' (i.e. have more rooms than needed) and use these to address the over-crowding need."

Bidding system/waiting time

These comments included concerns from respondents about the length of time that they had been on the housing register and the difficulties they had faced using the bidding system.

"It's ridiculous you want to get rid of people like this. You must make the system fairer and quicker. We have been waiting for 8 years in 1 bed flat and it's 4 of us here. It's getting unbearable to live like this. Sort it out now"

"When I started bidding I was bidder position number 150 for the properties now I am in position 15. A slow but good and reasonable progression. Over the years I have been paying my rent on

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time even when I was truly going through very hard times to avoid arrears. I held onto demeaning jobs to get long term employment references. Always hoping to get a stable permanent tenancy with Hackney Council, a permanent local job in health and social care, have a kitchen area with linoleum, get into a crammed solid tower block, sit on a balcony."

"I think it should be made VERY clear how long you will be on the waiting/bidding list & the EXACT property size as it was never made clear how many rooms or size of rooms I was allowed to bid on which results in a wasted bid not being eligible for. It would help if case workers responded when being contacted when it regards immediate change of circumstances. This will result in a smoother bidding process instead of people like myself not being able to bid as no property is deemed suitable due to lack of rooms & sizes. This creates a longer bidding process & keeps too many on the ladder so yes I do agree that the current system needs to change, it's need to be much clearer & simplified but I don't agree with the harshness of up & rooting family's to a property that doesn't suite their day to day routines, ie nursery/school runs etc. With that in mind I would like that to be taken into account & to be mindful of people's lives & mental health's that would be impacted."

Suggestions for other solutions and lobbying for change

These comments came from people who disagreed with the council's approach to the allocations policy and suggested a variety of other solutions, or that the council should lobby for change.

"A suggestion would be to look at which households have been actively bidding from all current bands and those who have not should be removed as maybe they are no longer in need of housing."

"Do you have a target percentage of social housing? I understand 44% is high compared to the national average of 17%. I would advocate for less social housing and keeping the same budget to increase the quality."

"The council need to be brave and look for another model to provide truly affordable decent housing for Hackney residents. There are other models the council could support and there are corporates who would work in partnership to find not for profit solutions. We do not have a lack of empty buildings we have a lack of housing. We can fund housing cooperatives, we can help people build houses at brick price, we can create council and people partnerships and housing bonds to give local people opportunities to secure their own housing. We can underwrite the cost of self builds and conversions. We can introduce local rent controls and proper housing standards as in NYC and Berlin. We can look to Europe for more examples of what works. We must not give in to capitalism and give up on the people in the middle because the solutions are hard. The pandemic is going to change how we do things, we will have empty shops and premises that will be empty for years unless we change the narrative and create opportunity. We can bring the empty flats over shops used as storage back into use. We can build low impact homes on the sites of car garages that no one uses. Fund a mortgage deposit scheme to help high earners move out of social housing and create a pipeline. People live in the center of Amsterdam because they converted empty shops and offices into residential properties, there is

no homelessness problem in Holland. Hire a big thinker, look up and outwards, we can do better than this because we are better than this. If you can be brave the community will support you."

"Instead of continuing to promote and develop luxury housing with the hope of a few flats round the back, the council should be defying the government and embarking on a huge council house building programme (if elected members are worried about being sued by the govt they should step down). Further, a major programme of compulsory purchase on all empty and run down private landlord property, and the insistent that all privately rented and right to buy property on Hackney estates be brought up to decent homes standard with the offer to buy back (less the discount)"

Look at individual needs

These comments represent those who suggested that the Council should consider individual needs when it assesses applications to join the housing register. This included respondents who highlighted the different levels of housing need that households in the same bands may have, and the need to consider their background rather than just looking at a number.

"everyone's application should be looked at individually according to circumstances. A family of 4 with only one person working should still have a chance even if their salary is 30,000."

"I agree the current system is not fit for purpose and this proposal is 'trying' to tackle the problem, but don't forget that everyone has a story which affects their families in different ways no matter how big or small their housing needs is."

"The housing officers must make sure that they assess individual circumstances properly in order to place them on the right band. lots of individual households are struggling in private rented houses because they are not being properly assessed."

Should be their own choice to remain on the housing register

These comments indicate respondents who highlighted that households should be able to make a choice to remain on the housing register, even if they are highly unlikely to secure social housing.

"I don't agree that people should not be allowed to join the register. It should be everyone's right to be allowed on the register, for a chance for a secure home for their family, even if it's a small chance."

"I think it is important to know the demand for social housing, so that the gap between demand and supply can be measured and the case for closing that gap through more supply better made. A low cost registration scheme for those who would like social housing but are currently unlikely to ever be offered it would be better than not counting them at all e.g. electronic registration with annual email to ask if they want to stay on the list."

"Do not remove anyone from the housing bidding register"

Invest more in support to access other housing and better swaps system

These comments indicate respondents who highlighted the need to provide increased support and advice regarding housing options or the need to invest resources to provide a better system for swapping tenancies.

"Put more resources into helping council tenants swap homes to fulfill their needs. This area is vastly ignored and could be a good solution for many"

"Having a home swap scheme within the borough would also be beneficial. Some people get housed in a completely different area from their support network which could unintentionally make them more at risk. Having a council wide, council led home swap scheme could help those who are not in immediate housing need (unable to go on the register) to be in the area of their choosing."

"The entire system does need an overhaul but this new system also seems to be utter crap too and sounds all glamorous that there'll be more help available but through experience I know that Hackney Council are pants in terms of offering support especially to the single person."

Consultation - during the pandemic and questions

These comments indicate those who had concerns about the decision to hold the consultation during the pandemic and the questions that had been asked.

"We've been in lockdown, Library's (which are the main source of information for many) have been closed, and we are at real risk of this proposal being signed off under our noses."

""As someone who has gone through the housing process in Hackney, I am concerned that this consultation has taken place in the middle of a pandemic when life is extremely hard for the very households you are trying to reach with this consultation. What level of privilege are you as Hackney council operating under to think that people living in hostels (with little to no wifi access), their emotional and mental health exacerbated by both their living conditions and the pandemic will have the ability to respond meaningfully if at all to this consultation which can have a detrimental impact on them?"

"This consultation is really poor, there is no option to comment on each question. All consultations need to engage with all Hackney residents, older people do not use the internet. Hackney Council should set up stalls outside busy shops/areas to engage in a more meaningful way."

"I think that the wording of the first question in this survey is manipulative."

Bands allocation system/change from 5 bands to 3

These comments indicate those that made comments about how households are allocated to the bands and the proposals to move to a three-band register. Some of the comments also

included suggestions on who should be placed in bands A, B and C and how homes should be allocated to these households.

"The proposed 3 categories are predicated on "existing accommodation" and ignore those who have NO accommodation."

"To say that people that have been registered over 10 years will be completely removed is totally unfair. If you've been registered 10 years or more you should automatically be accepted into at least the lowest tier of the new bands"

"Under the new scheme my husband and I would qualify for Band C but our son who lives with us who is currently registered with Hackney Housing would no longer qualify. We would therefore make him homeless should we move."

Issues with private rented sector / more regulation needed

These comments centred around issues with the private rented sector. Commenters suggested that if the Council is to encourage more people to rent privately, then more regulation of the sector is needed.

"'Suitable' private rented accommodation needs to be secure (in the sense of long-term, not statutorily secure), of good quality and affordable. That requires the council to work more closely with the PRS to improve the quality of lower rent housing in Hackney and to enforce against landlords where property is not of a decent quality."

"I agree that the system needs to change due to lack of homes available. But there must be some changes to how private let's work. This is probably needed at national level as there are too many homes, many ex authority that private landlords make huge income from at the cost of quality & or security of residents."

"I still cannot move from my private rented flat because landlords will not accept anyone on benefits as we are all tarred with the same brush."

"How will removing people who need social housing from the registered list not reduce the accountability of the state to provide housing for all people who need it? How will the genuine need be measured under these new proposals? How will any failures or progress be evaluated? Changing the goalposts and then sweeping everyone else under the rug into precarious and often substandard private housing is not going to help anyone. It's a short-term measure that will have awful long-term effects for residents in Hackney. Instead of these useless measures, the focus should be on regulating private landlords, aggressively addressing the lack of affordable housing being built (eg the proposed plans for the Tesco site at Morning Lane) and stopping evictions."

Should be for everyone/should make it easier not more difficult/right to housing

These comments indicate those who stated that social housing should be for everyone and that housing is a human right. Some of the commenters also expressed that they felt the Council should be making it easier to secure social housing, not more difficult.

"Social housing shouldn't just be allocated via objective criteria. Social housing should be available to all."

"There should be a rent cap in Hackney and more social housing for all, not just people who fit the council imposed definition of 'need'. This proposal promises things to people who would not make the list that, quite simply, will not transpire. It is dishonest to claim that this proposal benefits anyone except Hackney Council. Social housing and affordable housing should be an aim for everyone, not just people deemed as having the greatest need by the councils criteria."

"your proposals will exclude large numbers from the register, this is akin to excluding the middle classes from the nhs even if they can afford to go private. This is the death knell of social housing. it has to be, at least in principle, be universal, or it will fail to gain wide support and whither even further."

Plans are about making things look better / covering up level of demand

These comments were from those who felt that the proposals are about making the situation look better and cover up the level of demand. There was concern about the potential implications of not measuring the level of housing need in the borough accurately.

"Strongly disagree with the overall drift of the proposals, to take people of the list so that the list is smaller. Will improve your housing need/housing supplied ratio (maybe this is why you are proposing it?) but will do nothing helpful or positive. This is massaging the figures to get a better outlook, on a grand scale. Of course people understand the difficult of securing a council flat, they don't need to be thrown off the list completely to get this."

"These changes will lead to dramatically underestimating the desperate need for council housing"

"I also feel that removing thousands of the people off of the list will not provide solutions for their housing needs, it will only cover up a problem that will continue to exist. Personalised advice and mutual exchanges already exist."

Groups that need more consideration - single people/elderly/care leavers/key workers

These comments were from those who highlighted groups that they believe needed to be considered more carefully. They included single people, the elderly, care leavers and key workers.

"Is there any consideration for key workers? (I don't know - but it might be interesting to know how many good qualified nurses, teachers, lab technicians, OTs etc have to travel further than 5 miles - and how are schools and hospitals going to recruit desperately needed staff?)"

"Single people are the forgotten people in all of this. They're simply pushed to the back of everyone's minds and are made to wait an eternity to even get a sniff of a property."

"I think the elderly are very often left out and left vulnerable to become homeless in the first instance.   It seems of no fault of their own, their circumstances may have changed in life and all of a sudden they need housing support. They may not have many health issues and therefore may not meet the criteria which I find unfair.   Elderly people should be supported for housing and prioritised in the first instance, which in the long term would promote good health and save money."

"I consider that there should be a route for key workers, particularly nurses to secure affordable social housing."

Agree with changes

These comments indicate those who stated that they agreed with the proposed changes.

"The idea of three bands sounds better and allowing certain people who qualify to join seem more realistic than having people on reserve band having hopes that they will be housed soon but realistically will be waiting 10-20 years with no success."

"No, but I do agree to the proposed changes. It will help clarify through qualification those that need to be on the register and not."

"This proposal I believe would create a more transparent letting system. It will also minimise the never ending bidding for properties on letting websites without any results or offer of accommodation."

Suggestions about staff

These comments include a range of responses and recommendations about Hackney Council staff, including how to improve the service and changes that could be made.

"The housing officers must make sure that they assess individual circumstances properly in order to place them on the right band. lots of individual households are struggling in private rented houses because they are not being properly assessed."

"Nothing about the way you allocate homes is fair or transparent. Your whole system is corrupted as you have no idea of people's circumstances as they are, onky how you see fit to assess them."

"I strongly disagreed with the question 5 altogether! these services should already be available, if not why not? maybe if the housing department had a more hand on approach instead of hiding

behind bits of paper (sending letters) and email, try actually and proactively engaging people about their application. I have been on the housing list for 7 years now and in my opinion the whole department needs looking at, the service need to be tweaked, agreed but not to the extent that is being proposed. Whenever I call all you get is the customer contact centre who like the "firewall" for the department you never ever spoken with an officer, the call centre tell you "we will email them, you should get a response" then nothing and have to call back or you get an email 4 weeks later about information you already know about and does not answer any of the questions raised in the first place, total waste of time."

Shouldn't extend 'one direct offer' or reduce number of times can refuse an offer

These comments indicate that respondents felt that the council should not extend the 'one direct offer' policy or reduce the number of times that a household can refuse a suitable offer.

"I do not agree with 'one direct offer' policy suggested that could be included in Band B, as unsuitable or poorly located accommodation can worsen outcomes in other areas of a person or family's life and removing the choice entirely is unfair. I appreciate why in emergency cases one direct offer may be suitable, but I would not expand it."

"I think it's quite unreasonable to expect people to accept either of 2 properties that they are shown as I accompanied a friend to a viewing with Hackney Council, and both places were not suitable for living (one had broken concrete flooring throughout, toilet was blocked with no water) so unless the properties being viewed are suitable to the standards that LBH Housing staff would be happy to live there, it's unreasonable to expect others to."

"If under the new policy homeless applicants are placed in band B, then they should be able to bid on property just like everyone else in that band. Direct offers should only be made if they are severely overcrowded in there temporary accommodation or their time on the register far outstrips the average waiting time for homeless applicants and further investigation shows they are not placing bids on properties where they are coming up in the top 3."

"I am particularly worried and concerned by proposals to reduce the number of times working class families can turn down offers for social tenancies, which would reduce the choices of people like myself and my family to have some choice over where we live."

Concerns about people 'gaming' system and how to prevent this

These comments centred around concerns that people have around applicants 'gaming the system' and being unfairly allocated social housing. Some of the respondents also included suggestions of how the Council could look to prevent this in the proposals.

"Not enough investigating goes into the registration of tenants who apply for social housing (there are loopholes which aren't privy to the public, but with the right knowledge, people get through quicker). We have been on the waiting list for just over ten years, without moving any nearer to being "eligible" in the council's eyes for a move to a suitable home."

"I believe that the Council should prioritise people who are high need (health/social need, overcrowding etc), however, I believe that the Council should investigate these thoroughly to ensure claims are true."

"I think that people take advantage of the current system, specifically large families with 2 or more children. They try for children to make their gateway to the housing register and why should they be in the highest priority? This is how the new system will be designed."

Disproportionate impact on black people in the borough

These comments indicate respondents who raised concerns that the proposed policy would have a disproportionate impact on black people in the borough.

"Office of National Statistics figures show that black people are more likely to live in poor quality housing so will be more impacted by these changes. There is therefore a fundamental breach of equalities provisos."

"This decision would disproportionately affect Black people as ONS data shows are more likely to live in poor quality housing."

"ONS statistics show that black people are more likely to live in poor quality housing so will be more impacted by these changes."

Overlooking those in the middle who don't qualify for social housing but can't afford to rent privately or buy

These comments centre around the concern from respondents that the proposals overlook those who are 'stuck in the middle' and cannot afford to rent privately or buy a home, but do not qualify for social housing. They suggested the proposals be updated to consider this group.

"My observation is that the consultation does not take into account local ties. Hackney has a great community vibe and a long and proud history of welcoming new communities to form the vibrant borough it is today. BUT There are multi-generation families of all ethnicities in the borough where adult children and their (potential) families are unable to find genuinely affordable accommodation in a locality where they have communities, families, employment and other ties. Yet they may not be eligible for social housing because they are not an emergency or priority, so someone working at £25-£30K pa may need to live many miles away given the paucity of genuinely affordable housing locally."

"Absolutely unacceptable for Hackney council to take off SO many people who are on the housing register. There are no 'affordable' private rental houses, and this system only punishes the hardworking families who are stuck in the middle- not desperate enough to be regarded as emergency or severely overcrowded nor well off enough to afford private rental properties or shared ownership homes! I'm currently disgusted with the current council and 'change' they are bringing about to OUR borough."

"I am not high priority but I have been on the Council Housing register. It's very tedious and unless you are a high band, then there's no point in pursuing a property through this route. However, it would be interesting to know what support people who are in need of housing, but not eligible for these bands would receive as there seems to be a gap where people earn too much to be considered for social housing, but don't earn enough to buy their own property (including the rip-off shared ownership scheme where your salary has to be at least £50k + to be considered eligible for a property in Hackney)."

Need to consider those with learning disabilities/mental health issues as well as physical disabilities - impact on waiting times when medical/homeless combined

These comments indicate those that highlighted their concerns that learning disabilities and mental health issues were not adequately considered in the draft policy. Some of these comments also highlighted the impact on waiting times for those with a medical need would increase under the proposals, as many homeless households would have an earlier band date.

"Your new draft allocations policy states that you will be combining those with urgent medical/social needs with those who are in the homeless band in the new BAND B category. This will mean that those with urgent medical needs will face longer waiting times as there are hundreds of homeless households… If we are moved to Band B on the new system, we will have to face longer waiting times as hundreds of homeless households may come before us due to being in the same band and having an earlier band date. Longer waiting times will mean my son will have to live longer in my flat which is dangerous and is having a negative impact on his disability. I feel that a new proposed system should prioritise urgent medical and social needs. However, it looks like the new proposed system would mean longer waiting times for those most in need."

"I am concerned that the only significant medical conditions that will be awarded points are physical and that people with significant learning disabilities and significant mental health issues will not be included. The scope of what 'significant medical need' is not mentioned… I am worried that if people's significant learning disabilities are not included under 'significant medical need' it will become impossible for this cohort of residents to be housed in this borough and create local independent lives then end up in expensive residential/institutionalised care unnecessarily."

"Medical Need - Please consider those with learning Disabilities and /or autism within this. Too often there is a focus on physical disabilities (as medical) - However these two very vulnerable groups also need housing generally and for positive move-ons and are often prevented from accessing such housing. This can be especially problematic for those who rely on local family support, leading to costly council placements to be made outside the borough and reducing the person's independence."

Concerns about how changes will be communicated/impact on LBH reputation

These comments indicate those who were concerned about how the proposals would be communicated if they were to go ahead. Some of the respondents highlighted that the policy would be unlikely to be popular and may have a detrimental impact on the Council's reputation.

"This needs to be carefully managed as many people on the current register will be taken off and bitterly disappointed. The criteria for being overcrowded by one room will disappear, that is going to affect a lot of people who think they should be rehoused. If councillors do make a decision they need to have the courage to own that decision and not back down once constituents start complaining so they fear for the results of the next election… Much, much more effort is needed by the council to manage expectations."

"I think these proposals are a complete embarrassment and would do great harm to the Council's reputation for following progressive principles and representing all of Hackney's residents."

"I think it's a progressive and very good idea. I do think there will need to be a lot of publicity to explain the new system and why it is being proposed as there is currently a lot of adverse publicity about it - most of it misinformed."

"Reducing access to the housing register and removing many households currently on the register will lead to a significant reaction from applicants and there will be complaints which estate based housing staff may get the brunt of. I understand the need to act, but would appreciate back up for TMO staff who may come in for the misdirected criticism of "doing nothing to help" when this is a borough wide policy change. Communication of the new lettings policy with a clear explanation is a COUNCIL policy is essential and we then back that up by being clear with applicants about realistic expectations."

Should do this nationally, not as a borough

These comments were from respondents who felt that social housing allocations policies should be coordinated nationally, rather than on a borough by borough basis, in order to avoid inconsistencies.

"This is probably needed at national level as there are too many homes, many ex-authority that private landlords make huge income from at the cost of quality & or security of residents."

"There needs to be a real Local and national review of social housing and truly affordable rental properties."

"Eligibility should not be decided borough-by-borough! Shambles."

Responsibility for circumstances

These comments indicate respondents who suggested that residents should take responsibility for their circumstances, including overcrowding.

"Overcrowding in a lot of cases is a product of poor choice, just like being a single parent struggling to pay rent or find a liveable place to rent (personally speaking). Is both situations the children suffer the most due to adult choices they had no part in. But overcrowding takes place, why not rent? like everyone else. Should be for the sick or people with lifes at risk."

"There is not enough social housing to go round and residents should take more responsibility for their own situation rather than relying on the council."

Shouldn't change system as prospects may improve

These comments indicate those that suggested that the Council should not change the policy as the prospects could improve in the future. There was concern that the proposals would be a permanent change to a problem that may be temporary.

"Deceitful of you to argue that the system should be changed because prospects are now so dim: they may not always be so dim."

"I think you are asking the wrong questions. This all assumes that the process of administering a reduced stock of social housing is inevitable, which I question."

Stakeholder responses

In addition, responses were also received from the following groups and organisations. Their responses are summarised below.

Morning Lane People's Space (MLPS)
- MLPS is a campaign group composed mostly of Hackney residents, who oppose the current plans for 55 Morning Lane in Hackney Central (the Tesco site) and demand an alternative plan including at least 50% council housing and one that is informed by and is useful for Hackney residents.
- The changes will lead to underestimating the need for social housing due to the removal of people from the list and changing the name of the categories. This also makes it harder to campaign on the issue and expose when the system is failing people.
- This proposal will change council housing to a benefit for the most vulnerable rather than the vision that it is the most practical and affordable way of housing people.
- Tens of thousands of renters who are not necessarily assessed as having significant needs are in difficult housing situations. How will the proposals tackle the widespread exclusion of those on benefits from private-rented accommodation in London?
- The council should obtain investment for new social housing and work with private landlords to meet this need, rather than reducing the entitlement to social housing.
- ONS statistics show that black people are more likely to live in poor quality housing and be benefits claimants. The Equality Impact Assessment does not consider the impact on the disproportionate number of black people who do not have priority but cannot find suitable private rented accommodation. What assistance will be provided to them? If implemented, how will the equality impact of the changes be monitored?
- The council should be honest with people about their chances of getting social housing and offer them tailored support without removing them from the housing waiting list.
- It is unfair to remove people from the bidding system and compel them to take the first place offered - the current system was introduced because this didn't work in the past.
- It is dishonest to frame these changes as in the interests of those Hackney residents who need secure and affordable housing - pretending they will is likely to increase distrust of the council which as we know from our own consultation is already high.
- People in housing need are less likely to have reliable online access so consulting on these changes during a lockdown excludes many of those directly impacted. How are the council ensuring those most impacted by the proposals are consulted?
- Hackney previously cut the waiting list from 15,090 in 2013 to 7,926 in 2014. Can Hackney Council point to any ways that this has improved the situation for the over 7,000 people removed from the list then?
- Hackney Council says the changes will "allow more resources to provide dedicated support to households in housing need who we are unable to rehouse through the housing register". How will this operate and how will it differ from relief duty advice? Will this cause longer waiting times while searching for homes on systems like Home Swapper? How does this fit with the Council's commitment to bring services in house? How long will people wait for "alternative support"? How many properties are available in this way, what is their quality and where are they located?

- Shared ownership is not affordable for the vast majority of Londoners and so is unlikely to be affordable to those in housing need.
- The proposal includes "an enhanced mutual exchange offer to help households already in permanent social housing to agree a transfer to alternative accommodation". Will this and other "alternatives" be non-coercive? How will Hackney Council prevent these proposals from increasing gentrification?
- There needs to be a campaign for council housing and for government policies to address the housing crisis. Hackney Council's hands are tied by national policy but they should contest the government's limits.
- Hackney Council could be consulting on how to run a campaign that mobilises people in support of strategies that can address the problem of homelessness and insecure over-priced housing. What are the costs associated with the new system and could they be better spent on a campaign to challenge the government's housing policies?

Southern Housing Group
- Social housing should be allocated to those in need, not only those most in need.
- Agree that the current system is not working for the reasons set out in the consultation document.
- The proposals do not address the underlying problems of a lack of good quality social and affordable housing for people in housing need, but they could provide transparency and clarity for people, enabling appropriate support, advice and guidance to be provided.
- The service needs to be adequately funded to provide sufficient advice, guidance and support staff, with adequate time allocated to really help people.
- Understand why the council is proposing to replace the current five-band register with a new three-band register.
- LB Hackney should publicise figures for all those in housing need and base its planned response to include all those in housing need, not just those on the revised register.
- LB Hackney must commit to providing transparent communication about the changes and have a clear comms plan for this.
- Concerned about the exclusion of other groups, for example those overcrowded by one bedroom and would like to see a plan for dealing with this need, even if it is only providing advice and support.
- Amended allocations policy should be part of a culture shift (advertised as part of the Homelessness Reduction Act and surrounding policies) towards a policy of putting arms around people in housing need.
- The practices and processes surround how offers are made are more important than the number of offers made. Where direct offers are made and the viewings are conducted jointly with the Hackney and Southern Housing Group allocations representatives both attending, the outcome has been positive. Would recommend considering using this joint approach more often.
- The support services need to be fully staffed and have the time, training and resources to provide the support listed, that would benefit people in housing need.
- Want to see clearer plans for how the support services would be provided, and the difference between the services proposed and those currently offered.
- Concern that the reduction in the number of people on the register will not release enough capacity to enable LB Hackney to provide the services to a good standard.

Personalised, dedicated advice and support, and help finding suitable accommodation involve a significant amount of time and effort, not one or two brief appointments.
- Concerned that LB Hackney might expect us, as a registered housing provider, to offer similar advice and support services, which we will not have increased capacity to offer.

Child and Adolescent Mental Health Services Disability Team (CAMHS)
- The Child and Adolescent Mental Health Services Disability Team (CAMHS Disability) in Hackney is a specialist team based in the Hackney Ark made up of Clinical, Counselling and Educational Psychologists, Psychotherapists, CAMHS Clinicians and Assistant Psychologists a Consultant Child and Adolescent Psychiatrist and Administration. We work with children and young people up to the age of 18 with moderate to profound Learning Disability/Intellectual Disability (ID) and ASD and those with significant physical disability and life limiting conditions. This population often has multiple diagnoses including Autism Spectrum Disorder (ASD), Attention Deficit Hyperactivity Disorder (ADHD) and significant physical health needs as well as ID.
- Often these families are extremely vulnerable with a high level of single parents with multiple children with additional needs. There's a higher level of additional learning difficulties amongst the parent population and many are managing mental health difficulties.
- These families are the most marginalised and vulnerable families in the borough and have been put at even more risk due to the Covid-19 pandemic.
- Inadequate housing is a significant contributing factor to health inequalities.
- Despite this, under the current allocations policy many of these families are classified as ""B"" medical priority which is given ""if the need is urgent but the accommodation is not a threat to significantly exacerbating the condition"".
- Ample research and the clinical, medical and professional opinion of our team is that for families affected by learning disabilities and autism, living in overcrowded or otherwise inadequate or unsuitable accommodation poses ""a threat to significantly exacerbating the condition"", therefore meeting the criteria for ""A"" medical priority.
- Concerned that some of the families may be dropped from the banding support they require if they are on ""B"" medical priority or lower.
- Whilst the impact of physical disability may be well understood, the impact of autism and learning disabilities/ID may be less clear. Many of the children we work with are pre-verbal meaning they require alternative communication systems. Difficulties include:
    - Social communication difficulties
    - Difficulties with regulating and managing emotions
    - Sensory processing difficulties
    - Repetitive and/or restricted behaviours
    - Chronic sleep difficulties
    - Difficulties with toileting and self care
    - Difficulties understanding social expectations around privacy, which can lead to issues when young people with learning disabilities and autism engage in masturbation
- Environments must be adapted to meet these complex needs, to prevent unnecessary and detrimental distress to the child.
- Children with ASD and Learning Disabilities need a quiet space to use, when sensory input from the environment becomes overwhelming, when calm space is needed to

regulate emotions and when children and parents need space from each other to prevent or recover from conflict. As many children have chronic sleep difficulties, children need their own rooms. This is even more essential when there are multiple children with learning disabilities and/or autism in a household.

- Not providing these environments can lead to complete overload and meltdowns. Some children may engage in smearing or urinating and when young people with learning disabilities and autism do not have a private space, masturbation may occur in the presence of parents or siblings. All of these behaviours can pose a safeguarding risk to the child and family, and lead to family and placement breakdown. Providing this space is a necessary requirement to appropriately house this population.
- Parenting children with disabilities leads to higher parenting stress and also relationship breakdown. Parents of children with disabilities in overcrowded or inadequate housing often experience their own mental health needs including anxiety, depression, trauma, and at times, suicidality.
- When parents and children live in small, overcrowded spaces, parental distress and difficulties in the parent-child relationship (attachment difficulties) can occur or worsen. This can also lead to placement breakdown.
- Many families on waiting lists for appropriate housing in Hackney are from Black and minority ethnic groups and experience unjust ethnic and racial discrimination and harassment, alongside discriminatory practices and historical disadvantage, leading to poorer socioeconomic positions.
- These repeated injustices are found to significantly increase the likelihood of poor physical and mental health outcomes for minority groups, which would likely be exacerbated by being removed from the housing register.
- More single parent families who tend to be socially isolated and are dependent on their local support network. If they were relocated to housing out of the borough, there would be an increased risk of placement breakdown. Changes in school placement would be extremely detrimental to this group of children and young people.

Royal British Legion
- The Royal British Legion was created as a unifying force for the military charity sector at the end of the First World War, and still remains one of the UK's largest membership organisations. The RBL is the largest welfare provider in the Armed Forces charity sector, helping veterans young and old transition into civilian life. We help with employment, financial issues, respite and recovery, through to lifelong care and independent living.
- Hackney borough is home to 92 recipients of Armed Forces pensions or compensation. Placing the borough last out of 32 London boroughs for comparison. The borough is also home to Ashford House Army Reserve Centre on Worship Street, currently hosting 31 Military intelligence Company.
- We recommend that the RBL's Supporting the Armed Forces Community with Housing in England – A Best Practice Guide, is read as part of this consultation.
- Hackney Council should ensure that all residents approaching housing services are asked a question that will identify their membership of the Armed Forces community.
- Staff must have a clear understanding of how to support applicants.

- Recommend that the Hackney Council regularly review staff training processes to ensure that all relevant staff are aware of the housing allocations policies specific to the Armed Forces community.
- We recommend that the draft lettings policy clarify how members of the Armed Forces community will be allocated into one of the new bands on the register.
- It is vital that administrative barriers are minimised as personnel can be left unprepared for the bureaucratic nature of civilian welfare provision.
- Those who join the UK Armed Forces at a young age are reliant on the training and skills provision within the Forces to be able to successfully enter "civvy-street". The Army tends to recruit from more deprived areas of the country and up to 50% of Army recruits have literacy and numeracy skills below Entry Level 3
- Encourage Hackney Council to consider this cohort of the Armed Forces community be placed in a specified band in the draft lettings policy by default.
- Recommend that the draft lettings policy specifically allocate former members of the Armed Forces, and former partners and spouses of members of the Armed Forces into Band C, at a minimum.
- We recommend a degree of flexibility in the local connection policy to enable a waiving of the five-year time limit on a discretionary basis.
- We recommend that the local connection exemption apply to divorced or separated spouses or partners of Service Personnel who are separating or have done so, in the five years preceding their application.
- Recommend that it is not necessary to differentiate between accommodation provided by the MoD or sourced privately.
- We recommend Hackney Council incorporate in full the most recent statutory guidance dated 27 June 2020, Improving access to social housing for members of the Armed Forces into their new housing allocation policy.

Clarion
- Clarion Housing Association provides homes to over 126,000 households across 176 local authority areas in England and we relet over 10,500 homes each year.
- Clarion is under a regulatory obligation to assist local authorities meet their statutory housing duty.
- Clarion currently has 1,918 homes in LB Hackney (1193 general needs homes, the rest shared ownership, leaseholders, retirement or supported homes) with nominations agreement and positive working relationship in place.
- The aims of the proposed Allocations policy are clear and welcome, but how this works in practice and possible undesirable consequences need to be thought through carefully.
- The policy states it does not apply to existing residents seeking a transfer and they should contact their landlord for an internal transfer unless applying under the Right to Move scheme, under occupying and wishing to downsize, over 55 and wanting sheltered accommodation, or a foster carer needing a larger accommodation. This would suggest an existing Housing Association tenant in a 1 bed property with 2 children would not be eligible to register for re-housing. The family may not be able to afford moving up to a three bedroom property in the private sector, and as Clarion (like many RPs) do not hold a transfer list for Hackney or North London this would mean the family would remain locked in overcrowded accommodation unless a mutual exchange was found.

- Freeing up LA officer's time to provide those in housing need with advice on all of the other housing routes suggested is highly desirable. It is important to be realistic about the extent that these alternatives can provide a complete solution.
- Looking at the limited data available there is insufficient mutual exchange / home swapping to meet current demand, especially as the number of people looking to downsize is far lower than number of those looking for larger accommodation.
- The number of mutual exchanges is limited by human factors such as staying within an existing neighbourhood, maintaining employment or schools, and within access of existing social support networks.
- Successful housing allocation and mutual exchange matching is dependent on access to reliable data, on both applicants and available homes. It is likely that more resources and investment in IT systems may be required to deliver the desired level of service.
- Clarion works in 28 London Boroughs and are aware several LAs across London are undertaking similar reviews.
- Allocations, affordability and mobility all need to be assessed holistically by the range of affected partners. Many RP's nomination agreements may need to be reviewed in the light of the increasing pressures on social housing across the capital.

Shelter
- Shelter supports reasonable preference categories but "Should social housing be allocated to the most in need" is quite ambiguous and open for interpretation as most people will feel that they have a high need for social housing even though they do not meet the strict criteria listed.
- We support changes to the current allocations system and agree that those in the existing reserve and general bands are very unlikely to secure an offer of social housing, but we are not confident that the answer is to remove all households in these bands completely.
- From the current proposals it is not clear where certain vulnerable groups sit eg: those who are homeless, care leavers and people who are at risk of or fleeing violence (both domestic and other) and/or experiencing anti-social behaviour.
- Further clarity is needed on what/who would be considered as in 'emergency' need for housing and those who have a 'significant' need for housing. Who would be determining this and what evidence would be required?
- Would like further clarification on LB Hackney exercising discretion or offers outside of the proposed banding.
- The preference groups do not include those who are at risk of or fleeing violence (domestic and/or other), homeless households and care leavers.
- Statutory overcrowding rules are narrow and outdated, it would be more reasonable to use the bedroom standard to assess overcrowded households.
- It is unclear what would meet the requirements for a medical or social need to move and/or what information and evidence would be required.
- Do not agree with the proposal to reduce the number of refusals from 3 to 2 as with less people on the housing register there should be less consequence of people refusing offers causing backlogs.
- Those in Band A should bid as well as being able to receive a direct offer.
- The proposal of 1 direct offer to those in Band A needs further consideration and would like to see more robust processes, guidance and built in discretion around the one direct

offer. What would happen if someone refused the offer? Would a person fleeing domestic abuse or someone with an emergency medical need really not be able to move anymore? An in-built discretion should be included into the policy to cover those scenarios where a person has reasonably turned down an offer.

- Pleased to see that alternative support will be provided for those who do not qualify. It must be holistic, tailored and long term for the individual or family.
- It would be helpful to have a bit more information around how this will work in practice. Where private rented accommodation is the option, will LB Hackney be providing rent in advance and/or deposits? What would the process be around downsizing? Will LB Hackney be working with local partners to provide support and assistance? Lastly, the numbers of households needing this alternative support will be very large – does LB Hackney have the resource and infrastructure in place to provide this service in a meaningful way?

Online drop-in sessions and telephone engagement

Online drop-in sessions and telephone engagement were introduced as a result of the social distancing measures in place in response to the coronavirus pandemic.

Four online sessions were held on:
- Session 1: Tuesday 12 January 2021, 7pm–8.30pm
- Session 2: Wednesday 27 January 2021, 12 noon–1.30pm
- Session 3: Tuesday 9 February 2021, 6pm–7.30pm
- Session 4: Wednesday 24 February 2021, 4.30pm–6pm

Every session was attended by two of the Benefits and Housing Needs Operations Managers, supported by other officers from the service. The sessions took place on Zoom and attendees were asked to sign up in advance of the session using the consultation website. Participants could submit questions in advance on their registration form and via the online platform Slido. During the sessions, they could submit questions using the online chat function on Zoom and through Slido. The format of the sessions included a short presentation at the start followed by a Q&A session. The presentation included information about how the session would be run followed by information about the proposals. The sessions were recorded and uploaded to the consultation page, although there was an issue with the recording of the session on 9 February.

In total, 232 people registered to attend the four online sessions.

Session	Number of registrations	Number of participants	Number of questions received in advance
Tuesday 12 January 2021, 7pm–8.30pm	80		90
Wednesday 27 January 2021, 12 noon–1.30pm	76		61
Tuesday 9 February 2021, 6pm–7.30pm	44		64
Wednesday 24 February 2021, 4.30pm–6pm	30		30

Key themes emerged across the four sessions in the questions asked by participants. These included questions about:
- Banding and specifically, which bands participants would be placed in under the proposed system.
- The bidding system, including whether people should continue to bid in the interim, how the bidding process would change under the proposals, and suggestions for how to improve the bidding system.
- What help is available to buy a home in Hackney due to high house prices, and how people can access this.

- How to access financial support when renting in the private rented sector.
- What right residents would have to appeal and challenge decisions under the proposals.
- How medical needs are considered within the proposals and whether those with medical priority would retain this.
- Overcrowding, including questions about how this is assessed, and whether those experiencing overcrowding would be eligible to join the register under the proposals.
- How the council is encouraging new affordable housing and why some schemes in the borough have low levels of affordable housing.
- Whether the proposals are being suggested as a way to make the level of housing need in Hackney appear lower than reality.
- Households' personal circumstances and what band they would be likely to be placed in if the proposals go ahead.
- Current waiting times for social housing and how these would be impacted by the proposals.
- How swaps and downsizing will be encouraged more.
- The process for implementing the proposals and how the council would manage thousands of reapplications at one time.

Those who were unable to join online sessions or would prefer to speak to someone on the phone were able to request a call back with an officer from the Benefits and Housing Needs service. This was also used as an option for people who had questions about their specific personal circumstances and the likely impact of the proposals, as due to the differences between each household's circumstances, this would have been impractical to cover during the online sessions. In total, 226 people engaged via telephone.
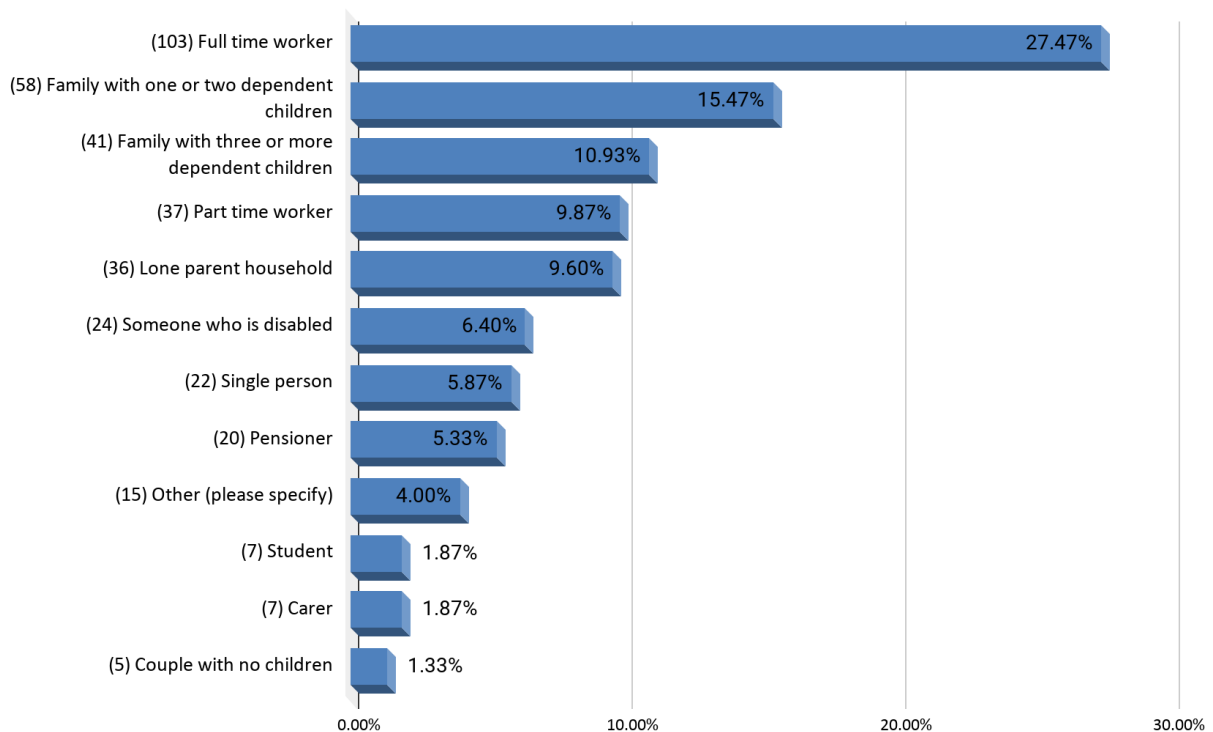
About you

Are you currently on the housing register? (Base 377)
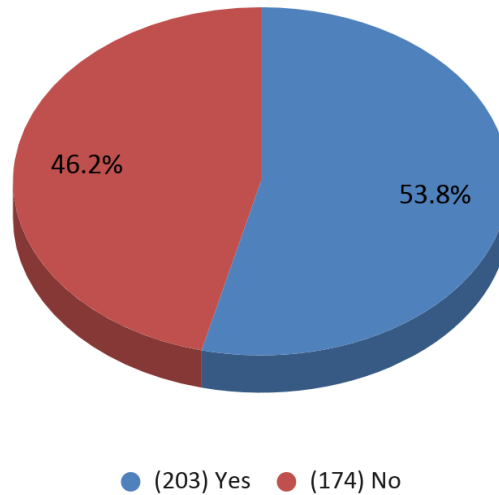


● (203) Yes   ● (174) No

Over half of all respondents, at just under 54%, who took part stated that they are currently on the housing register (203). Just over 46% stated that they are not (174).

Are you a: (Base 374)

Category	Percentage
(103) Full time worker	27.47%
(58) Family with one or two dependent children	15.47%
(41) Family with three or more dependent children	10.93%
(37) Part time worker	9.87%
(36) Lone parent household	9.60%
(24) Someone who is disabled	6.40%
(22) Single person	5.87%
(20) Pensioner	5.33%
(15) Other (please specify)	4.00%
(7) Student	1.87%
(7) Carer	1.87%
(5) Couple with no children	1.33%

The highest percentage response to this question relates to those who are "full time workers" (103). This is followed by "family with one to two dependent children" (58), "family with three or more dependent children" (41), "part time worker" (37) and "lone parent household" (36).

Cross-analysis - "Are you currently on the housing register?" vs "Are you a:" (Base 372)
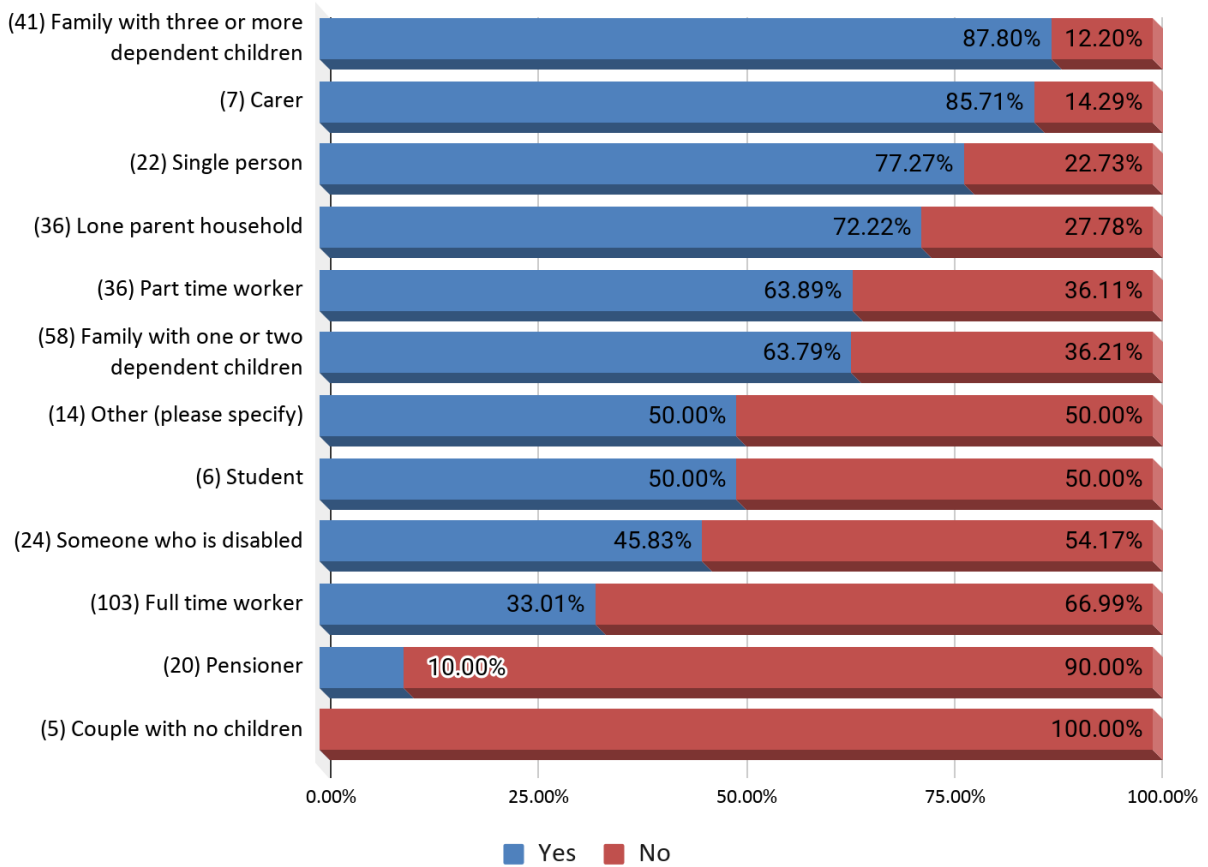

This chart represents whether a respondent is on the housing register by respondent profile/ characteristics.

"Full time worker" accounts for the highest number of respondents, based on proportions, with two thirds stating "No" to being on the housing register (69 of 103).
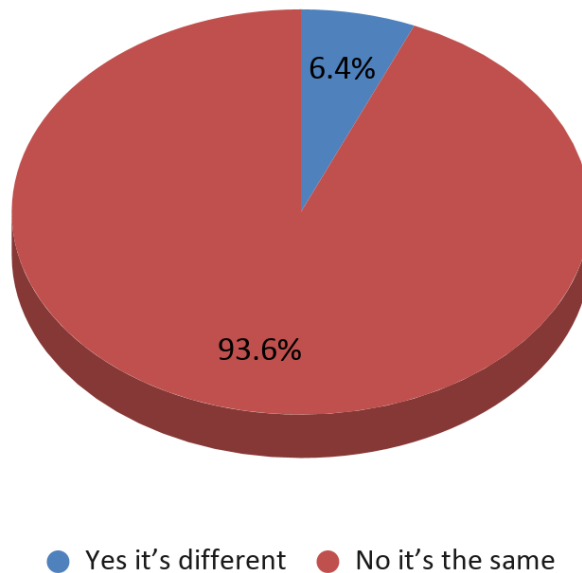
8 categories have a majority percentage response (50% or more) who stated "Yes" to being on the housing register.

Gender: Are you….. (Base 359)
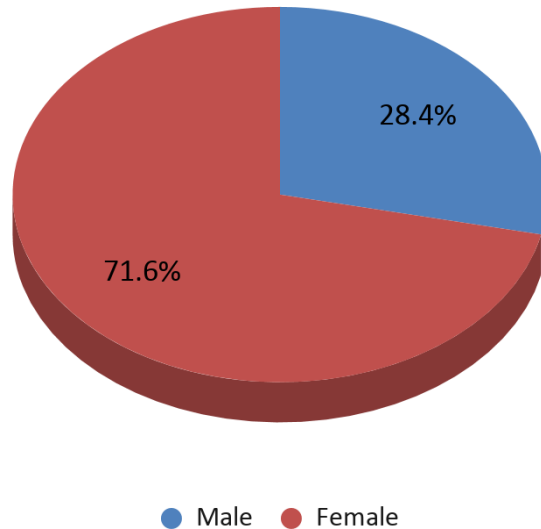
● Male ● Female

The majority of respondents, at almost three quarters, were female (257), with just over a quarter male (102).

Is your gender identity different to the sex you were assumed to be at birth? (Base 358)


● Yes it's different ● No it's the same

The majority of respondents stated that their gender identity was the same as they were assumed to be at birth (336). Only a very small percentage at just over 6% stated that it is different (23).

Age group (Base 376)
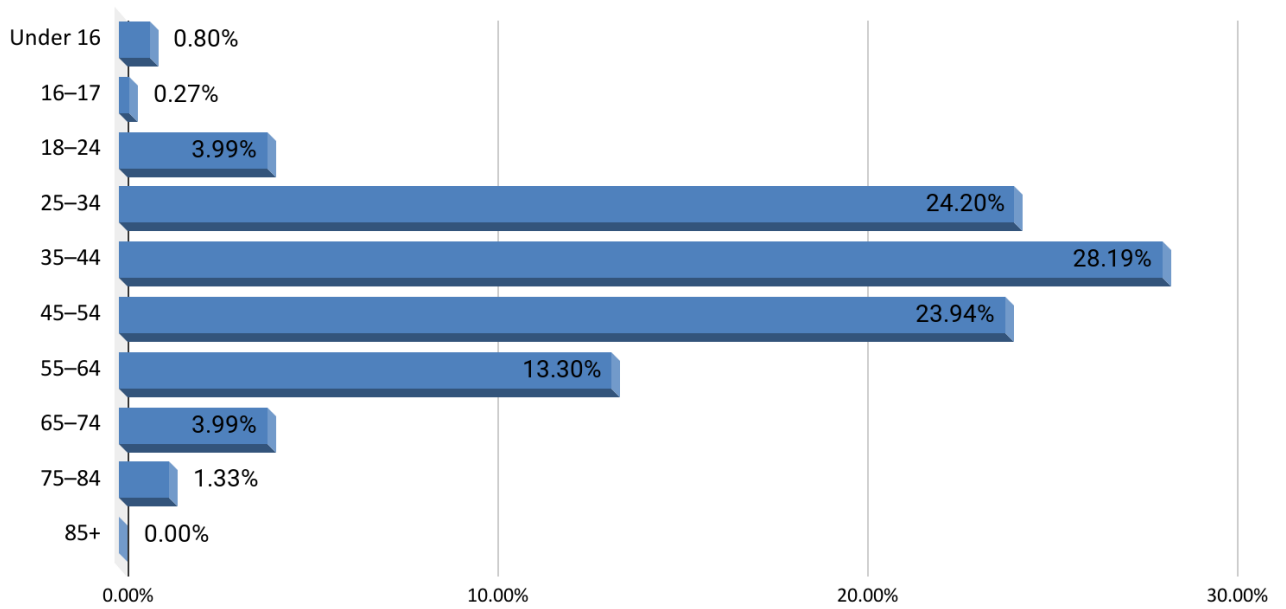
The highest percentage of respondents were in the "35-44" age group (106). This was followed by "25-34" (91), "45-54" (90), "55-64" (50), "18-24" and "65-74" (15 each), "75-84" (5), "under 16" (3) and "16-17" (1).

*__Cross-analysis - "Are you currently on the housing register?" vs "Age group" (Base 373)__*
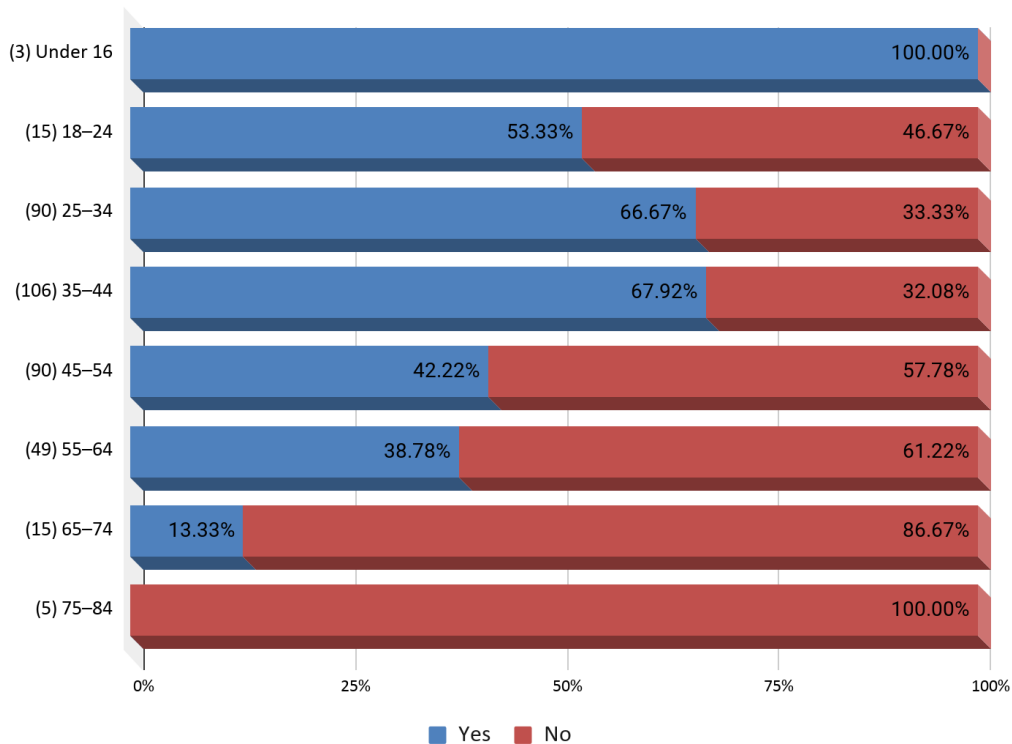
The chart above represents whether a respondent is on the housing register by age groups.

A higher percentage of respondents from under 16 to 44 age groups stated that they are on the housing register (142 of 201). 45 to 84 age groups had a higher percentage of those who are not on the housing register (100 of 171).

25-34 and 35-44 age groups had the highest number of respondents who stated "Yes" to being on the housing register, both at two thirds of respondents in their respective age groups (60 of 90 and 72 of 106 respectively).
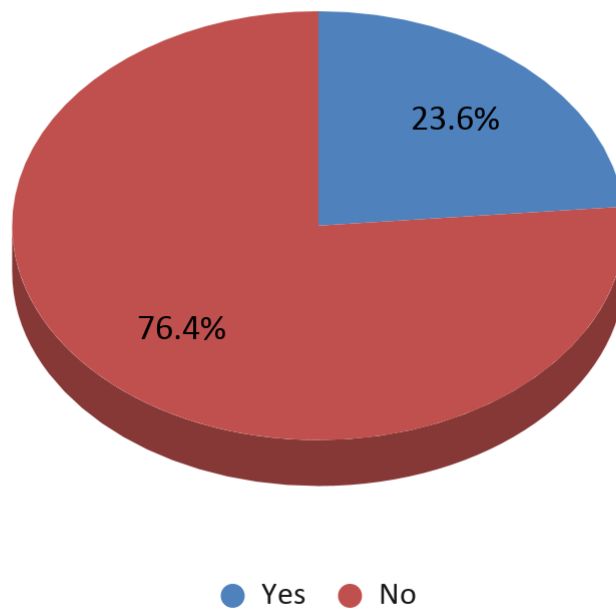
45-54 had the second highest number of respondents, with just under 58% stating "No" to being on the housing register (52 of 90).
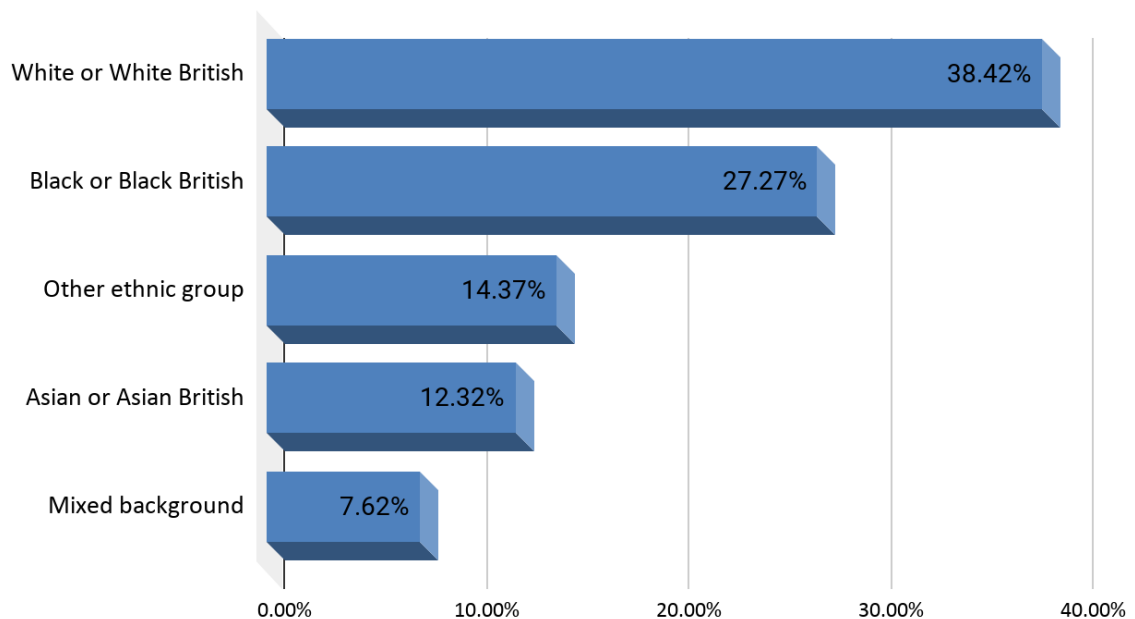
<u>Disability (Base 371)</u>
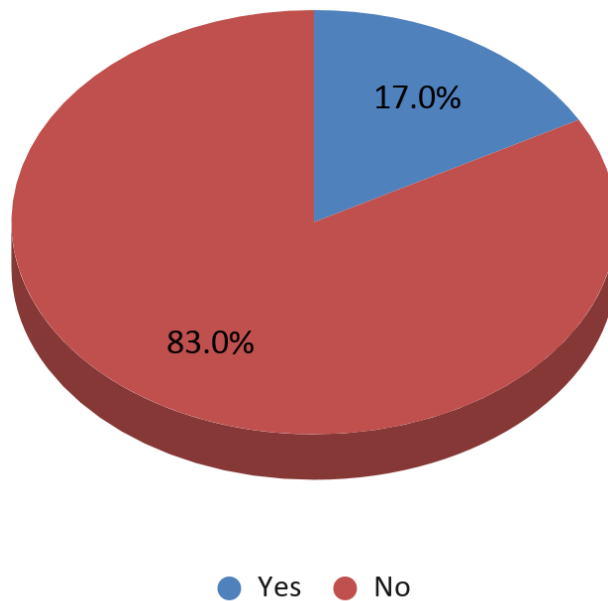
The majority of respondents stated that they do not have a disability (308), with 17% stating that they do have a disability (63).

Caring responsibilities (Base 373)


● Yes ● No

The majority of respondents, at just over three quarters, stated that they do not have caring responsibilities (285), with just under a quarter stating that they do have caring responsibilities (88).

Ethnicity (Base 341)

White or White British	38.42%
Black or Black British	27.27%
Other ethnic group	14.37%
Asian or Asian British	12.32%
Mixed background	7.62%

0.00%   10.00%   20.00%   30.00%   40.00%

The highest percentage of respondents stated that they were "White or White British" (131). This was followed by "Black or Black British" (93), "Other ethnic group" (49), "Asian or Asian British" (42) and "Mixed background" (26).

Cross-analysis - "Are you currently on the housing register?" vs "Ethnicity" (Base 341)
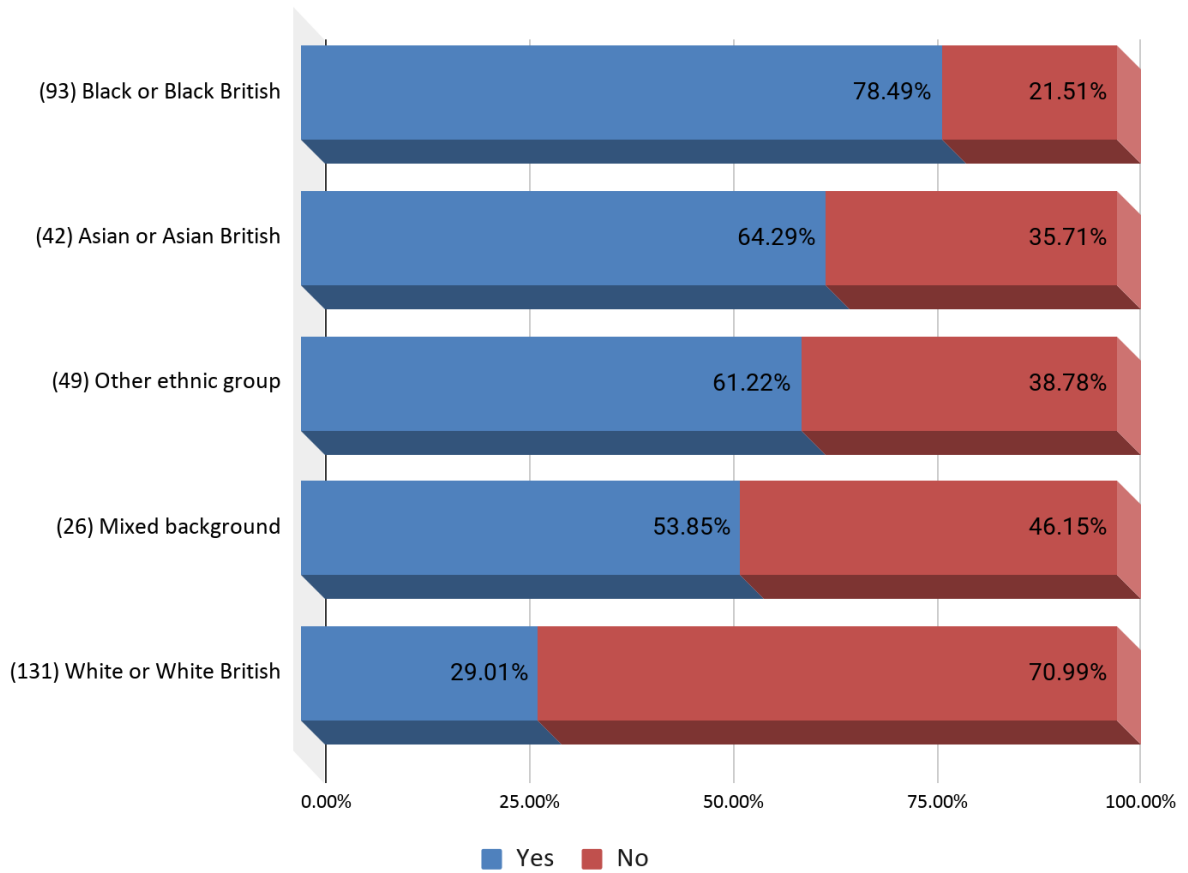

The chart above represents whether a respondent is on the housing register by ethnicity.

The highest number of respondents was "White or White British" with almost three quarters stating "No" to being on the housing register (93 of 131).

"Black or Black British" had the highest number of respondents who stated "Yes" to being on the housing register (73 of 93).

## Religion or belief: Are you or do you have… (Base 328)
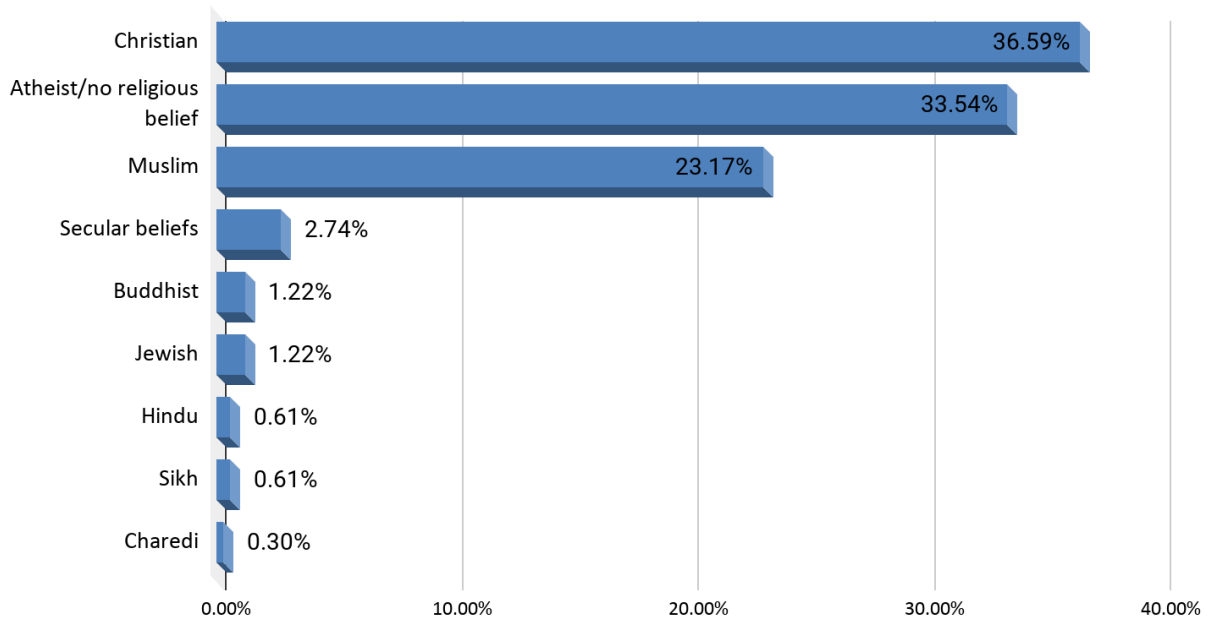
The highest percentage of respondents stated that they were ""Christian" (120), closely followed by "Atheist/no religious belief" (110), then "Muslim" (76). All others accounted for a much smaller percentage.

Sexual orientation (Base 328)
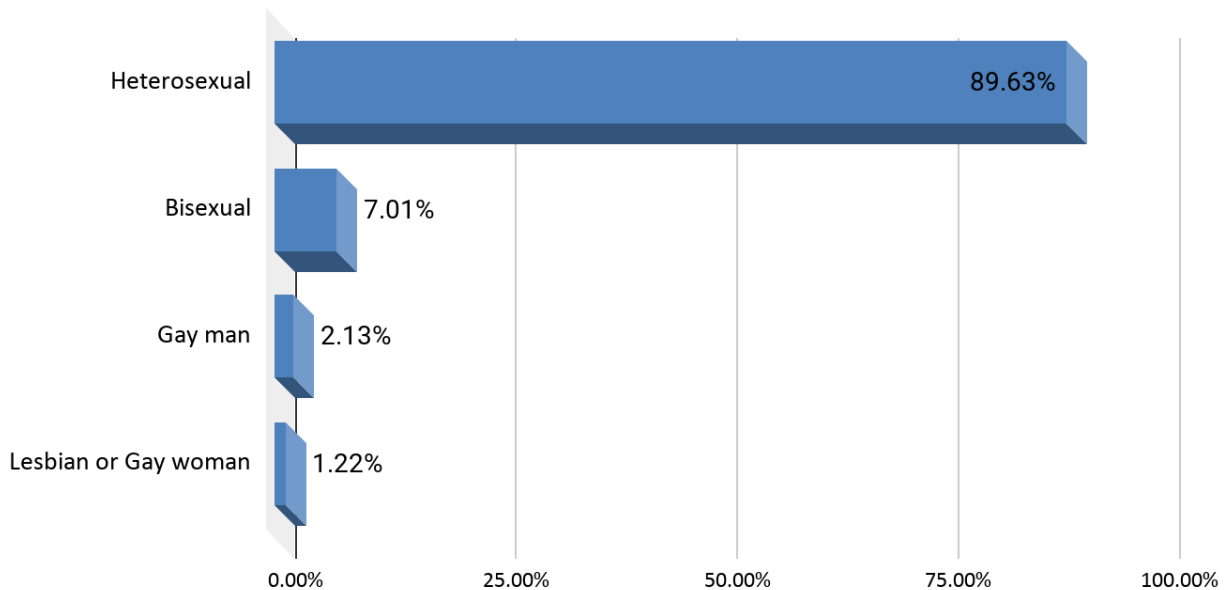
The majority of respondents stated that they were "Heterosexual" (294), with all others accounting for a much smaller percentage.

Pregnancy or maternity (Base 364)

10.4%

89.6%

● Yes ● No
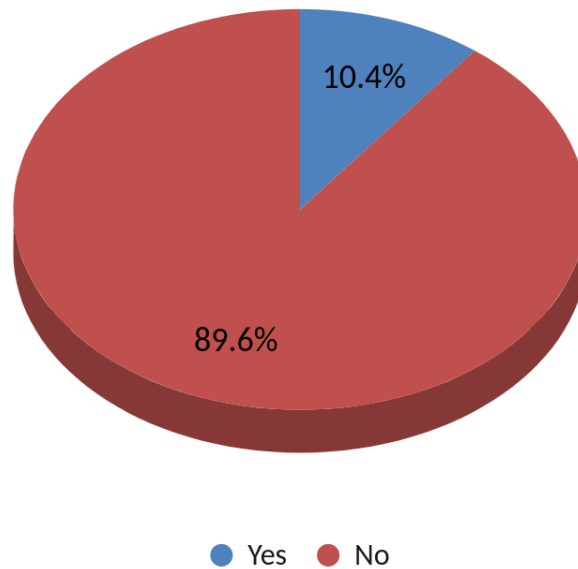
The majority of respondents stated that they are not pregnant or on maternity leave at the time of completing the survey (326), with just over 10% stating that they are either pregnant or on maternity leave (38).