

Members' Questions and Answers

Background

In addition to the formal resident consultation, officers have engaged with Members on the design of the new lettings policy at a number of meetings. These questions and the responses provided have been collated below:

Q. Is there an urgency with moving forward with the new Lettings Policy?

The 2018 manifesto includes the commitment to "...manage rising demand for social rented homes in Hackney...review how we allocate these homes to ensure the system is as fair and effective as possible... ensuring those in the highest need are a priority." Extensive engagement has taken place over the last two years to develop the proposed policy and this is now being brought forward for approval.

In addition to the delivery of the manifesto commitment, we also know that the housing crisis in Hackney (and across London more widely) is becoming increasingly acute. The number of people on the Council's housing register, and also the % assessed as being in acute housing need has continued to rise, while the number of lettings has reduced significantly. The vast majority of people on the housing register face extremely long waiting times and in reality will not be successful in bidding for a Council home.

Adding to the human need that can not be met through the Council's own stock, the complexity of the current policy means that a very large amount of officer time is spent responding to resident complaints and requests for review of scoring, which very rarely (if ever) leads to a change in terms of the residents' success in securing a Council home. This means that much less quality support can be provided to help residents explore alternative options that will meet their needs. Ongoing pressures on the Council's finances are likely to further reduce this capacity, resulting in even more residents failing to find suitable housing.

Q. Has there been sufficient engagement in the development of the proposed Policy?

Over the last 3 years officers have carried out an extensive programme of research and engagement to inform the development of the proposed Lettings Policy. This includes benchmarking against other local authorities, engagement with residents, Members and Scrutiny panels.

Following this, the proposed changes to the scheme were subject to a public consultation to ensure that residents were able to comment on and inform the final design. The consultation ran between December 2020 and March 2021 and 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. Additionally, a dedicated telephone number was made available for advice and discussion purposes and a number of 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. The comments and feedback garnered from the consultation process have informed the final design of the scheme and how it is implemented.

Q. What is the Council doing to improve the supply of social housing in Hackney?

Q. What are we doing to increase social housing in new builds and use of empty homes?

One of the most significant challenges facing Hackney Council is the need to increase housing supply and access to accommodation. Indeed “Increasing Housing Supply” is a key objective of the Hackney Housing Strategy. Over the next five to ten years this strategic challenge will only grow for a number of key reasons:

- The Hackney housing market has witnessed the largest increase in property values in the UK
- Demand for housing is rising rapidly
- Homelessness is increasing
- Government housing policy is focused on home ownership

Affordability is also a critical issue in Hackney. The Council does not support the Government’s “affordable housing” tenures as these “affordable” options are in fact completely unaffordable to Hackney residents. In terms of affordable housing we only support and build homes that are genuinely affordable: social rent, shared ownership and Hackney Living Rent (which is around 30% of market rent).

In his 2018-22 Manifesto, the Mayor set a stretching target that *“During the next 5 years we will directly deliver, or enable with our partners, over 3,000 new homes across the borough including 800 new council and social rented homes and 700 council shared ownership homes.”* Despite the combined challenges of Brexit, Covid and the unspeakable cyberattack on the Council, this target is on track to be met. During the manifesto period to date we have started or completed 3,073 new homes, of which 401 are for social rent and 580 shared ownership, both through Council direct delivery and partnership working with other landlords and developers.

Despite this very significant direct delivery house building programme, the housing crisis in Hackney is of such a scale that the Council will not simply be able to build its way out. The programme itself is under pressure from a number of critical factors including increased costs and supply issues, uncertainty in the housing market, woefully low grant rates from Government and unnecessary restrictions on the way Right to Buy receipts can be used to replace homes that we are forced to sell.

In addition to the Hackney Is Building programme, the Council therefore looks towards other methods of increasing the supply of housing for Hackney residents. Possible solutions and options for increasing housing supply are organised around three broad categories:

- **Financial incentives**
- **Housing acquisitions**
- **Alternative supply options**

Options in these categories include:

Financial Incentives

Landlord incentive schemes
Home swaps and under-occupancy moves
Deposit schemes to help tenants to buy a home
Empty property incentives (including EDMOs)

Housing Acquisitions

Hackney council buybacks
Purchasing homes
Purchasing land

Alternative supply options

Modular homes
Conversions of underutilised commercial and community space

The Council's delivery programme is focused on in-house delivery. However, this and the options above could be complemented by alternative delivery options, potentially for example by an expansion of the role of the Hackney Housing Company.

All options are currently under detailed assessment with pilot sites in the process of being identified.

Q. Has the cyberattack meant that residents on the housing register have lost the ability to secure social housing?

The impacts of the cyberattack in October 2020 included the legacy housing register system being unavailable. Data has been recovered and work is in progress to develop modern software for managing the Council's housing register, in line with existing plans to provide modern and more user centred technology to support this important service.

A list of applicants who are already on the housing register that have reported a change in circumstances has been created. These changes will be picked up as part of the transition process to ensure that residents are not unfairly disadvantaged and that they are placed in the correct band under the new policy. Band dates will be applied as previously so that residents are not disadvantaged (the date will be the date they would have made the application had the cyberattack not happened).

For those residents who have had a change in their circumstances and would like to make a new application to the housing register, they have been advised they can do so when the new register is available. As the wait for housing is many years they will not have been materially affected as they would not have been able to successfully bid for social housing in the intervening 9 months.

All those who are currently on the housing register and were not suspended from bidding due to review at the point of the cyberattack are still able to bid and secure a social housing home if successful as this takes place on a separate software system. Those who were suspended at the time of the attack in the general band will not be disadvantaged due to waiting times. Residents suspended in the urgent band will be put on the direct offer list should the matter be resolved once reviewed.

Q. Why do we move homeless households into privately renting and not social housing tenants? Private Rented Sector options are not suitable for people currently living in social housing

The Council has a statutory duty to provide effective and genuine housing advice to its residents. The Council will give residents information on all possible housing options to allow them to make a decision that is right for their family. However, housing advisors from any organisation would not advise social housing tenants to give up their secure tenancy in favour of privately renting in a buoyant housing market without careful consideration and understanding.

The Localism Act 2011 introduced the power to discharge a housing duty for homeless households into the private rented sector as well as by an offer of social housing. This is a statutory power and is accompanied by MHCLG's Code of Guidance and case law (https://england.shelter.org.uk/professional_resources/legal/homelessness_applications/local_authority_homelessness_duties/local_authority_main_housing_duty#reference-13).

All LAs are expected to discharge their housing duty into the private rented sector and a statutory return is made each quarter to MHCLG. This power does not apply to secure social housing tenants for whom the Council has no housing duty under the Housing Act 1996 (ie. existing social housing tenants).

Homeless households who have been assisted under the Homelessness Reduction Act since April 2018 are aware that their housing duty can be discharged through a suitable offer of privately rented accommodation. Officers have witnessed a notable change in attitudes since the introduction of the act and the willingness of homeless households to consider renting privately over the last 3 years. Many households are now engaging with the Council in seeking a privately rented home as illustrated in the increase in the number of households that have been successfully assisted to move:

	Number of Lets	In Hackney	In London (excluding Hackney)	Out of London
2017/18	49	34	13	2
2018/19	88	44	37	7
2019/20	118	42	68	10
2020/21	452	199	259	10

*This total is 468 and the total is 452. Discrepancy is due to below being recorded by tenancy start date and lets being recorded by sign off date. The difference (16) falls into the next financial year.

All private rented sector lettings are negotiated with the financial offer of a months rent in advance and a months deposit for landlords to provide a two year tenancy at Local Housing Allowance rate.

Those residents who have been in temporary accommodation prior to the introduction of the Homelessness Reduction Act have typically been less willing to accept this change in focus and the Settled Homes Officers and Hackney Engage have been providing more intensive support to these households.

When offering advice and support personal circumstances are always considered to attain the best possible outcome for the resident.

For residents to whom we owe a housing duty under the housing act any offer of a PRS tenancy to discharge that duty has to be for a suitable property - it must meet the specific needs of the resident in terms of affordability, size and locality. Where there is a clear need for an existing support network any placement away from that network would not satisfy the suitability test.

For other residents on the Housing Register we cannot and would not compel them to move anywhere. The proposals for advice and support are intended to allow residents to make the most appropriate choice for their family. Some may consider that the need for a larger affordable property is more important than living in a particular area.

Q. Medical assessment: how transparent and consistent will the panel and it's decisions be?

Previously the Council's medical assessment team consisted solely of temporary members of staff and was not part of the permanent Council staffing establishment. The Benefits & Housing Needs Service has now invested in a permanent Medical Team of 4 officers, consisting of 1 x Senior Medical Advisor, 1 x Medical Advisor, 1 x Medical Officer and 1 x Medical Assistant. The two most senior roles are qualified occupational therapists. The Senior Medical Advisor has been recently recruited.

This team will continue to work closely with Adults' Social Care, Now Medical, Neighbourhood Multi-Disciplinary Teams, the borough's GPs and Hackney Ark to ensure that the correct decisions are made. The team will retain the responsibility for decision making and utilise interviews and home visits when required. Where appropriate we will use qualified GP's to make a professional recommendation based on the medical information provided by the applicant. This work also feeds into the Neighbourhoods Multi-Disciplinary Team work. Medical Team briefing sessions will be scheduled to take place during the Summer for these groups as well as the borough GPs and the Integrated Discharge Forum.

All assessments and recommendations are made available to the applicant and appeal rights will be available.

Q. How are we considering the impact of a shorter waiting list on the Council's ability to lobby for better funding for supply of social housing?

The housing register is not an accurate reflection of the borough's housing needs. As every local housing authority has a distinct housing register policy with caveats linked to local circumstances, comparing the length of waiting lists is not a true comparator of need.

A more accurate picture of housing need for the borough can be obtained from other data sources such as Census data, Housing Needs Survey, HMO Licensing data etc.

An accurate and robust picture of housing need, in combination with the housing register, would therefore allow us to lobby, as well as present to funders etc, an accurate and current picture of housing demand in Hackney.

Q. How can we be assured that the support for residents will be empathic and sensitively delivered?

Providing empathic support is a key priority for the Benefits & Housing Needs service and has been at the heart of the service's redesign work. Officers have been trained in a wide range of skills needed to understand residents' needs and provide supportive and effective advice. This is complemented by close partnership working with other Council services and partners in the voluntary and statutory sectors.

Q. How do the proposed changes impact on Local Lettings Policies?

The proposed changes relate to the main Hackney Council Lettings Policy, which was last updated in July 2016. This policy is borough wide and operates in conjunction with the Council's local lettings policies for individual geographical areas of the borough and types of accommodation i.e. Regeneration schemes and Travellers sites.

Any review / changes to Local Lettings Policies will be brought forward separately and these are not affected by the proposed changes to the main Lettings Policy.

Q. How is the Council working to support care leavers with their housing needs?

The Council is pleased that the social housing quota for care leavers has been protected at 2016 levels despite the reduction of more than 50% of available stock for lettings to households. This demonstrates the commitment to corporate parenting as a priority.

The Benefits & Housing Needs service with support from Strategic Property Services have worked with Thamesreach to provide a new accommodation scheme that will commence in June. This is an accommodation scheme for primarily residents under the age of 35 with low level support needs. The service will refer in suitable care leavers via the Young Person panel with the Careleavers team.

The Council's new housing strategy workstream will also be exploring a number of new housing options for care leavers in line with the offer from other LAs who are unable to offer social housing to their care leavers. Most notably this will include Hackney Living Rent for care leavers. We are also looking to see how the Hackney Housing Company can be used more broadly for the procurement and supply of a range of accommodation including independent living for care leavers. A final strand is also assessing the suitability of modular housing, which could include provision for the care leaver cohort.

Q. Why can the Council not 'grandfather' applicants' positions onto the new register?

The Localism Act allows the Council to set out the conditions under which it allocates its social housing, provided reasonable preference is given to certain groups; such as people who are homeless, those occupying insanitary or overcrowded housing, those who need to move on medical or welfare grounds etc, as well as some current and former armed forces personnel.

It also has a duty to ensure that the policy, and the conditionality requirements included within the policy, are applied equally under the Equality Act and the terms of the Public Sector Equalities Duty.

When designing a new policy, it is important that any easements and/or restrictions that are to be included are applied equally regardless of whether the households were included as part of a previous Housing Register, unless specifically addressed within the policy document. This significantly inhibits our ability to put in place caveats that are only to be applied to those who are part of the current housing register.

Local authorities potentially open themselves to challenge if they treat households differently or apply criteria present in previous policies to some households that have not been carried into the new design. This is likely even if the policy specifically includes references that these

easements are applicable only to historic members of the housing register (we could be challenged on the grounds that the household could/would have applied earlier, had they been aware that this would have presented an advantage).

Q. How does the Council assess how many rooms are required to meet residents' housing needs?

The Council's current and proposed policies are more generous than the legal standard for overcrowding.

The legal 'room standard' states that:

The room standard looks at the number and sex of people who have to sleep in the same room.

Any room you can sleep in counts, not just bedrooms. Living rooms, dining rooms and studies count as rooms you can sleep in.

Your home is overcrowded by law if:

2 people of a different sex have to sleep in the same room

they are aged 10 or over

The rule doesn't apply to couples who share a room. Children under 10 aren't counted.

[\[https://england.shelter.org.uk/housing_advice/repairs/check_if_your_home_is_overcrowded_by_law\]](https://england.shelter.org.uk/housing_advice/repairs/check_if_your_home_is_overcrowded_by_law)

Hackney's policy does not include a living room in the count of rooms used to determine overcrowding. The current policy wording is:

Identifying whether or not you are living in overcrowded accommodation is based on the number of bedrooms you need and the number available within your accommodation (see the chapter on what size property I can apply for, page 20). All households consisting of more than 1 adult are considered entitled to access to a separate living room from their bedroom, although this room may be shared with non-household members. If a household only has access (shared or otherwise) to one room, then the household will be automatically assumed to lack at least one bedroom.

Visiting officers will review the rooms available and make recommendations for alternative layouts that will mean that homes meet residents' assessed needs (e.g. using a larger room as a bedroom for two young people or using separate dining rooms as a bedroom).

We propose the following wording in the new policy:

Overcrowding is normally based on the number of rooms you have relative to the size and needs of your household. When identifying rooms that can be used as a bedroom, we will include all the rooms that could be used for this purpose, for example a dining room. All households consisting of more than 1 adult are considered entitled to access to a separate living room from their bedroom, although this room may be shared with non-household members - we will not count this room when assessing overcrowding.

An applicant and their spouse or civil partner will be expected to share a room. Single people under 21 are expected to share a room with other people aged 21 or under of the same sex, whereas children aged 9 and under are expected to share a room regardless of their sex.

To be considered as severely overcrowded your household must require two more bedrooms (or rooms that can be used as bedrooms) than you currently have available in your current accommodation.

Q. What are some of the reasons behind the 58% not bidding ?

There are a multitude of reasons for residents not bidding:

- Limited supply - particularly for larger properties
 - Location - some areas of the borough are more popular than others so residents choose not to bid for less desirable locations
 - Landlord - some residents choose not to bid for housing association properties as they do not carry a right to buy.
 - Specific preferences - some residents will only bid for ground floor or street properties. Some will not bid for a property without a garden.
 - Medical need - supply of properties that meet specific criteria is low so tenants with specific medical requirements have limited opportunity to bid.
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Q. What steps are being taken to improve all of the surrounding services - void turnarounds, moves for older households to smaller properties, maximising use of longer term TA (eg on Woodberry Down Estate where buildings will eventually be demolished, and any other parts of the service we might improve?

We utilise over 500 voids on our regen schemes. Nearly all void properties are used by us for Temporary Accommodation until they are demolished. Utilising all regeneration void properties in this way has enabled us to keep more than 500 homeless families in the borough and to contain the cost of Temporary Accommodation which exceed £10m for 2019/20.

Housing services have been benchmarking voids rates and have a programme for improvement.

Q. How regular will the reviews of bands be and is it the best use of resources?

The reviews will be approximately every 12 - 18 months - residents will be able to confirm their circumstances online and upload any relevant documents directly. It will ensure that residents are able to bid on the properties that most closely match their needs and those who have had a change and are ineligible are picked up at the earliest opportunity. It frees up resources from administration of the housing register allowing us to give more time to residents needing one to one advice.

Q. An important part of the new scheme will be the advice and support we're able to offer people no longer given a place on the register. I see that this is part of the plan. How much additional staff time and other resources will be made available for this? And will the advice and support extend beyond advising people to seek alternative accommodation in the private rented sector?

Q. How realistic is the alternative option or will we just be fobbing people off?

This is a key part of our offer - we will not be paying lip service to this, it would be self defeating. We have gained a lot of experience in delivering the requirements of the Homelessness Reduction Act and will apply this to develop advice for these residents. This is a complex area because of LHA rates, benefit cap, employment and training options, local connections and support networks. Some residents will be able to access affordable housing, others may choose social housing elsewhere through schemes such as homeswapper. We will be working with residents to help them understand their options and how they might achieve them.

It is important to note that existing social housing tenants would not be advised to relinquish a social tenancy - it is recognised that social housing is affordable and secure and provides the stability of tenure most residents need.

Moving within Social Housing

- Mutual Exchange
- Choice Based Lettings
- Seaside & Country Homes
- Housing Moves
- Downsizing
- Fresh start

Other avenues

- Private rental sector
 - Living rent homes
 - Intermediate Market Rents
 - Shared Ownership
 - Hackney Sales
 - Help to Buy
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Q. Of the 387 respondents (to the residents consultation) how many are on the housing register?

Q. The number of respondents is also of concern. Is further outreach intended?

174 were on the housing register

We had 4 well publicised engagement events for the residents and a further one for Housing Association representatives, further outreach on the proposals would be unproductive. The comms plan will reflect the need to inform and advise residents of changes if approved.

No-one is suggesting there is less demand or less need to build - to meet the identified need under the proposed policy it would take 8 years at current supply levels with an additional **500** new build properties a year to clear - that does not account for any new residents joining the list.

Q. What specifically did the respondents say needed to change, it would be interesting to hear these views as I am not sure that chucking them off the list would have factored highly

This can be viewed in the official consultation report provided.

The [FAQs](#) from the public engagement events also provide some insight into the thoughts and concerns of residents.

Q. What is included in lower housing need?

Lower housing need equates to the qualifying conditions in the existing [lettings policy](#) - Section 6 describes the “B” priority criteria for medical, social and overcrowding.

The draft policy (para 2.7) explains what would be considered as significant housing need.

Q. Will we have to train people to provide expert advice?

We already have a well trained and experienced team in the Benefit and Housing Needs Service and we will ensure that any supplementary staff reach the same standards. This will be complemented by staff from Hackney Housing who are best placed to assist council tenants.

Q. One of the issues is that affordable secure housing will not present itself just because we have told people they are no longer eligible for council housing. Why can't we offer advice but allow people to wait on the list if they choose to do so, even if they are unlikely to get council housing quickly?

The existing policy effectively allows residents to join the list and “wait” for social housing even though those in the lower bands have no realistic prospect of securing a social tenancy. This is a source of significant member casework and complaints are residents are frustrated that they are unsuccessful through the bidding process.

By retaining a larger register there is an administrative burden on the Benefits and Housing Needs Service. The proposals to reduce the list reduce that burden allowing resource to be redirected to resident advice. Without a reduction in the size of the register and the administration we would not be able to provide advice within the current staffing and budget levels.

Any increase in building social housing would be delivered years into the future - even if it could deliver 500 units a year for Hackney it would take 7 years continuous supply just to meet the demand from households currently in Temporary Accommodation who make up 25% of the current Housing register.

Q. I'm interested in similar changes in other London boroughs, you mentioned Camden and Lambeth?

Please see the Living in Hackney scrutiny commission hearing documents. The visits to Camden and Lambeth with Councillors helped to develop an ethos of honesty to ensure that we all deliver the statutory requirement of ‘genuine and effective housing advice’. Members did not feel that the schemes they saw were appropriate for Hackney.

Q. Will there be an appeals process for people who disagree with being removed from the list?

Under the Housing Act 1966 (166A (9)) an applicant has the right to request a reconsideration of certain decisions.

If the applicant disagrees with a decision made by the council in relation to an application to join the Housing Register they may ask the Council to reconsider it. In addition the Council's complaint process will pick this up so that disputes can be raised with the Ombudsman.

Q. Many people I know had to wait 10-20 years for their first public sector home, it is not a new phenomenon by any means. These are circumstances which have existed since the late 1980s.

The figures of units let quoted in the presentations include social housing lets by Registered Providers. Please note that the wait for many of the tenants on the housing register is in excess of 20 years and for those in the lower bands securing social housing via the Councils housing register will never happen. More recently casework has quoted individual waiting times in excess of 40 years.

Q. Can we have a breakdown of how much this service is currently costing please?

In excess of £600k pa in officer resource on the Lettings Team and additional costs in terms of customer contacts to corporate customer services, complaints and members casework. These contacts often have little impact on housing outcomes and the new policy will enable this officer time to be redirected to more effective conversations to help residents find suitable housing that meets their needs.

Q. There is an underlying premise that we were not prioritising need before now. I don't believe that. This is an exercise in managing down expectations: depoliticizing the issue; We are treating council housing as a last resort and letting go of the notion of council housing for all who need/want it.

The existing scheme does prioritise need but is no longer fit for purpose since the last review in 2016. The current scheme does not prioritise need consistently and is perceived unfair - for example an applicant with a child sharing a room in their parents' house would be urgent band and is predicted to achieve a social let in under 2 years, a similar applicant in one room Temporary Accommodation would have to wait 12 years.

Q. The timing is also very bad.. people have had such a hard time over the past year... now to be told there is no hope and you cannot remain on the list.. why can't they be given the waiting times and make their own choice about waiting.

Q. There were a lot of concerns that this might not be the right time given the fact we are just out of the pandemic and election is around the corner.

No time is the right time. This was a manifesto commitment from the last election.

There is a significant risk that future budget constraints and savings requirements will mean that capacity and flexibility will not exist in the future to enable the service to deliver a programme of this sort.

Most residents are not satisfied with waiting, particularly those in the lower priority band who have no defined wait time. With a hope that they will attain a social let some residents take no action about their immediate housing situation and perpetuate problems.

Q. From a Mental Health perspective can we make sure the sources of support we have locally residents are directed to these?

All staff in B&HN have had Trauma Informed Care training and interviews and discussions with residents are conducted in an empathic manner. Where we recognise concerns about residents mental health we will provide appropriate advice, signposting or referral.

We have an accredited mental health practitioner and social workers embedded within the service.

Q. We already prioritise need. So why will this be different aside from knocking out the general and reserved categories?

The existing scheme is complex and misunderstood by residents. Because of the manner in which "priority" is assigned it can lead to significantly different outcomes for residents with broadly similar needs. For example, an applicant with a child sharing a room in their parents house would be in the urgent band and is predicted to achieve a social let in under 2 years, a similar applicant in one room Temporary Accommodation would have to wait 12 years. The urgent band household would achieve their tenancy at the cost of a lower band resident who had already been waiting many years.

The proposals simplify priority so that most of those residents who satisfy the eligibility criteria are treated in the same way and have a predictable outcome. In the example above under the new proposals those residents would join band B and have a similar wait for social housing.

Over time residents will see that they are achieving higher placements when bidding for properties - under the existing scheme those in lower bands are constantly displaced by higher band residents joining above them.

Q. How will people living in overcrowded homes in PRS be supported to find more suitable PRS lettings if they are on the waiting list?

We recognise that larger families in overcrowded accommodation find it difficult to secure suitable accommodation in both the PRS and Social Sector because of limited supply and affordability. The proposed scheme would not penalise residents who move to better accommodation but remain overcrowded by two rooms, they will retain their eligibility and band date.

Facilitated by the proposed policy change, the intention to change the type of conversation we have with residents will ensure all options and likelihood of obtaining social housing are clear from the outset. Informed tenants can make their own decisions about what is best for their family.

Residents may be eligible for other assistance - through the Discretionary Housing Payment Scheme to help with rent in advance or deposits, or through the Hackney Discretionary Crisis Support Scheme for other needs.

Q. How much will it cost per person? Is the advice based on hourly rate as regards the approach.

Utilising the tube map approach to service delivery the cost per person will vary.

Many residents on the register with low priority do not see the housing register as a realisable means of securing alternate housing but are on the register because if you're not in the draw you can't win the lottery. These residents may not seek further advice as they are already aware of the options available and how to achieve them.

A further cohort will be able to self serve using online information and tools

This is not a cost cutting exercise. Time savings achieved through the lower administrative burden of a smaller register will be redirected to delivering tailored advice.

Q. Is it possible to continue with the list and still offer the wraparound service?

Not without additional funding. Resources freed up from administration will be redirected to providing advice without that time saving that could not happen. Any additional advice provision would have to be funded.

There is a likelihood that a significant proportion of applicants would not engage with advice services if they remain on the list.

Q. What about a compromise 4-tier system - with the 4th tier being a non-bidding tier, where nevertheless households are able to access the proposed detailed advice for the private sector, can apply for exchanges outside borough and potentially can engage with housing associations for their variety of offers. To have a 4 tier system to put residents in knowing fully well they won't be getting the social housing and still working with them on other options.

A 4 tier system of this sort was not part of the preparations work or consultation and is not now an option without a complete restart. As previously identified, a system that effectively acted with a reserve band could lead to legal challenge and would come under scrutiny from the Ombudsman. However, we have now included a transitional band that will provide some protection to households currently on the register.

A review based on existing criteria will not deliver a significant reduction in the number of applicants on the register.

Experience shows that the fact of being on the register dissuades applicants from engaging in meaningful dialogue about their housing choices and mitigates against providing them with effective support to help meet their housing needs.