

# Housing Allocation Policy Consultation

## Consultation Report

Responses to the consultation undertaken  
December 2023 - January 2024



# Housing Allocation Policy. Consultation Report. March 2024

## Introduction

Stakeholder consultation on changes to the Housing Allocation Policy was undertaken between December 2023 and January 2024.

The consultation focused on seven proposed changes to the policy, listed below:

1. Adoption of the national bedroom standard
2. Removal of non-dependent adult children from assessments of need
3. Reducing the residency requirement from 4 years to 2 years
4. Introduction of an income cap
5. Removal of the additional priority given to working households
6. Removal of the cumulative preference policy
7. Removal of the policy giving additional priority after 6 years.

The details of the proposals were set out in a consultation document published on the Council's website, alongside a copy of the revised draft policy and an information guide to the Housing Allocation Policy.

The consultation document explained the reasons why the changes were being proposed, details of how they would be implemented, including where discretion or exclusions might apply, and the potential impact of the proposals. The links to these documents are provided below.

[Draft Housing Allocations Policy.pdf](#) (Size: 605.77K)

[Guide to the Housing Allocation Policy.pdf](#) (Size: 127.82K)

[Housing Allocation Policy Consultation Details.pdf](#) (Size: 226.5K)

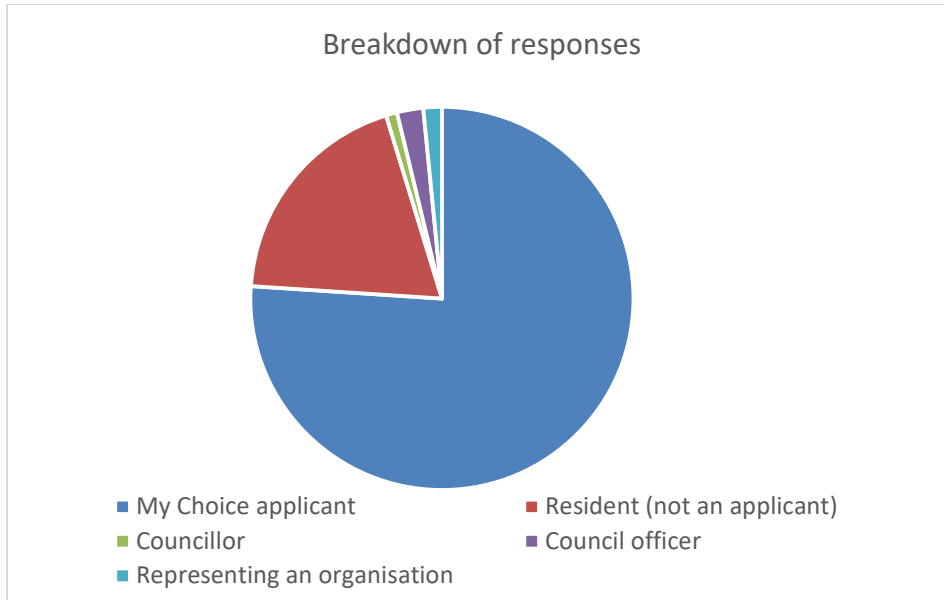
The consultation was mainly based on an online survey which was widely promoted to local residents, housing register applicants, local voluntary and public sector organisations, council officers, Councillors and housing providers.

In addition, three workshop sessions were held with Councillors, Registered Providers and Bracknell Forest Homeless Forum and meetings/presentations took place with stakeholders at their request.

This report presents the outcome of the consultation. The first part covers the responses received through the online survey. The second part summarises the discussion and comments made in the workshop sessions.

## Part 1: Results of the online survey

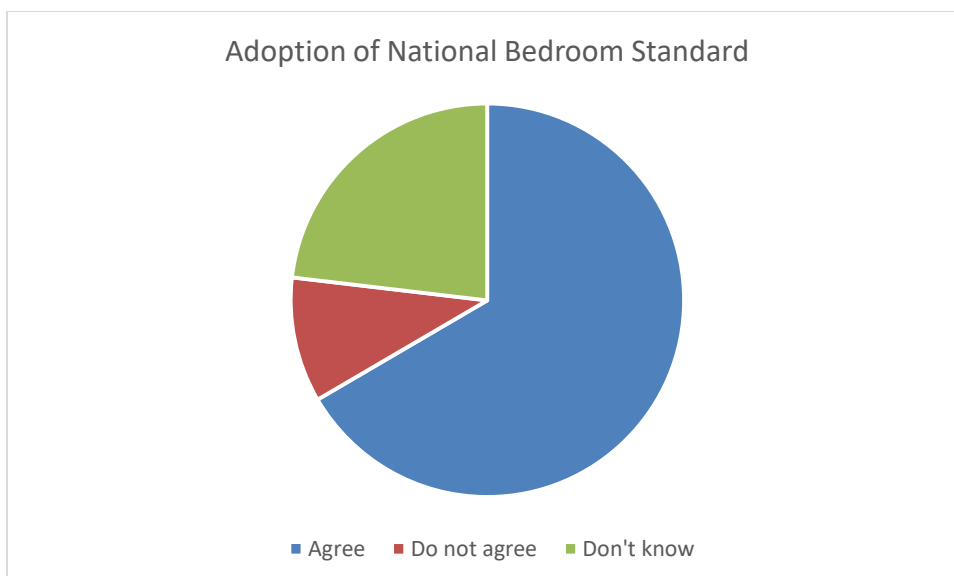
The online survey ran for 8 weeks between 4 December 2023 and 31 January 2024. A total of 318 people completed the survey.



The vast majority of respondents were housing register applicants (76%) and local residents (19%). The remainder were Councillors, council officers from other service areas, and representatives from other public or voluntary organisations.

### Proposal 1. Adoption of the national bedroom standard

There was strong support for this proposal with 65% of respondents in agreement.



## **Comments made by respondents (officers' responses below in bold)**

Many of the comments referred to various reasons why it might not be appropriate for children to share a bedroom and a range of circumstances in which an additional room would be needed.

- Some adults/children need separate bedrooms due to long-term illness or disability.
- It's not always safe or appropriate for children to share – children with SEND or ADHD or where there is a large age difference, or are not siblings (even if same sex)

**Officers agree that in certain cases, households might apply for an additional bedroom where there are specific medical or welfare needs. For example, a household that includes a disabled child who cannot share a bedroom with another child because of their disability. This is covered in the policy under exceptional circumstances. We do not provide a list of exceptions as each case is assessed individually.**

Some respondents said that children should not have to share a bedroom at any age:

- Older children should have a separate bedroom regardless of sex and not have to share.
- Under 10s need their own room/privacy and shouldn't have to share - sharing is only suitable up to age 7 or 8.

**Providing a separate bedroom for each child is not sustainable and is not a housing need, as it is considered reasonable for children of the opposite sex to share a bedroom up until the age of 10. This is in line with the DWP (Department for Work and Pensions) and Statutory Guidance on Housing Allocation Schemes<sup>1</sup>.**

Some comments referred to the use of living rooms and small rooms:

- The size of rooms needs to be taken into account as they may be too small to share.
- People should not be expected to sleep in living rooms.

**We do not consider living rooms as spaces for sleeping when assessing housing need for the housing register. Where rooms are exceptionally small and cannot be slept in by more than one person, the applicant may be considered for a move to a similar sized property with larger bedrooms.**

Other comments focused on the impact on households who would no longer be able apply for a larger home.

- If you can only apply for a larger home once children reach the age of 10, they will be sharing a room for years before they are rehoused.
- The proposal is unfair as many households will be removed from the register.

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<sup>1</sup> [Allocation of accommodation: guidance for local authorities - Chapter 4: Framing an allocation scheme - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/allocation-of-accommodation-guidance-for-local-authorities)

**It is recognised that rehousing times are currently long for households needing a larger property, but by bringing in this change it should be possible to reduce the length of wait that applicants with an assessed housing need are waiting for alternative accommodation. Applicants will have their application re-assessed to establish their housing need and requirements under the new policy. This will mean that some applicants will be considered to be adequately housed. Unfortunately, those households with no assessed housing need will be removed from the housing register.**

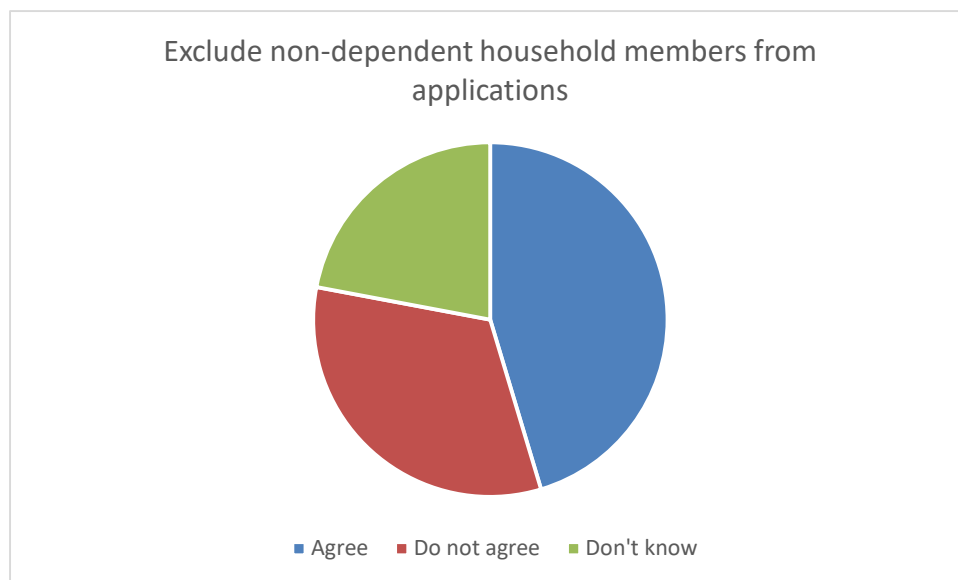
Finally, some people asked why the Council did not free up larger homes occupied by single older people who did not need them.

- The Council should focus on moving older people out of large properties they do not need so that there are more larger properties for families.

**Existing tenants have secure, lifetime tenancies, which means that they are entitled to remain in their properties even if they are larger than they need. Under the new policy it is proposed to give people wishing to downsize to a smaller property a high level of priority. In addition, officers are working on a separate strategy to support people to downsize.**

#### Proposal 2. Non-dependent adult children

45% of respondents agreed with the proposal to exclude non-dependent adult children from assessments of need and 32% did not. The remainder were undecided.



#### **Comments made by respondents (officers' responses below in bold)**

A large number of comments received related to the limited financial means of young people and the high cost of accommodation.

- Cost of housing (PRS and buying) is so high and young people's earnings are low so that most children cannot realistically afford their own accommodation at that age.

**House prices in the private rented sector, whether for buying or renting, are at a historic high and represent a challenge for all young people looking to leave home. Unfortunately, proposed changes to the housing allocation policy cannot change the situation in the private market. Outside of the housing register, the Council will continue to work with other providers to ensure that accommodation and support are available to young people and to provide advice on the Council's website.**

Other concerns were:

- This will increase homeless applications from young people.
- It will create more pressure on the housing register as older children will need to be rehoused.

**There is no evidence to suggest that homeless applications will increase - a high proportion of current homeless applications (75%) are already from single people. Whilst there may be an increase in housing register applications made by non-dependent children currently living with their families, there is a relatively higher supply of one bedroom properties. Also, the impact of the policy will be to reduce demand for larger properties as some existing applicants will no longer have an assessed housing need for a larger property.**

Many of the comments received suggested that young people were being forced to leave the family home:

- This is wrong - children should not be forced to move out of their home at 21.
- Important for families to stay together - this is breaking up extended families.

**To be clear, the policy does not force anyone to move out of the home or cause families to break up. Rather, the policy proposes that household members over the age of 21 who have been living as part of the household will no longer be taken into account when assessing housing need. This means that these households will not be entitled to apply for additional bedrooms to meet the accommodation needs of older, non-dependent children.**

As with the previous proposal, respondents cited various exceptional cases in which an older child may need to continue living within the household.

- Some have support needs e.g. foster children or have autism and are not ready or able to live alone at 21, or provide care - each case needs to be looked at separately.
- Children at university need somewhere to come back to.

**It is recognised that not everybody over the age of 21 can live independently and this has been covered in the policy. In these cases, a formal assessment undertaken by a relevant professional will be required to support the request and a decision will be made whether to include the non-dependent as part of the application. Children at university may**

**remain on the application, in most cases until they finish their education, but can also make their own application to the housing register.**

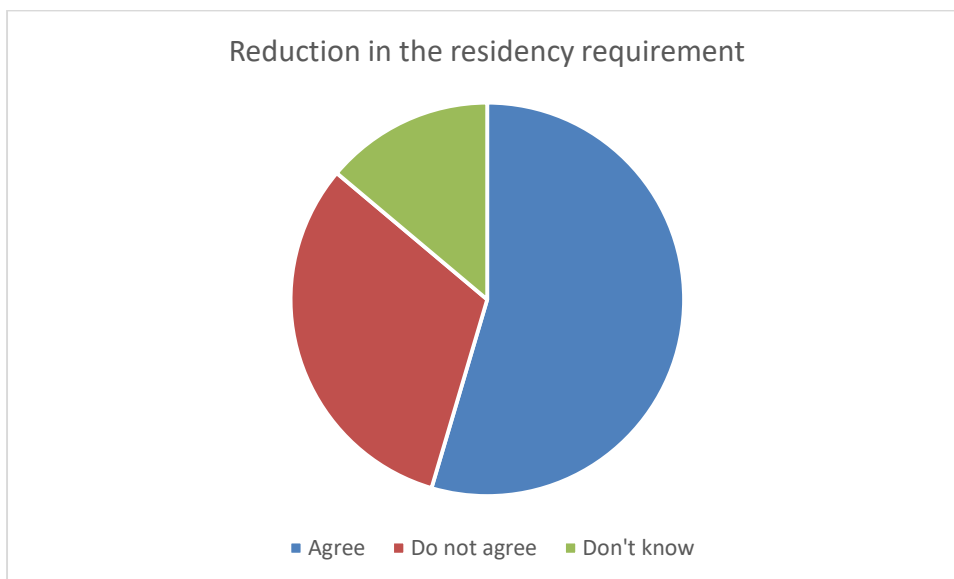
Some people found it unfair that households with older children would be treated differently from those with young children.

- It's not fair that households with older children are treated differently to younger children and have to suffer overcrowding with no chance to make an application.
- Some overcrowded households applied years ago for rehousing and are still waiting but now that their children have got older they will no longer qualify.

**It is considered important to ensure that the limited supply of family homes is prioritised for those with dependent children who are likely to have a long-term need for a larger home, rather than households containing older children who may leave home and no longer need a larger home.**

### Proposal 3. Reducing the residency requirement

A majority of respondents (55%) agreed with the proposal to reduce the residency requirement to qualify for the housing register from 4 years to 2 years.



### **Comments made by respondents (officers' responses below in bold)**

The most common point of disagreement was the view that long-standing residents should have priority over those who had moved to the borough more recently.

- Only long-term residents should qualify, not those with little connection to the area.
- Those who qualify as a result of this change should be placed at back of the queue, after existing applicants.

- This is unfair to existing applicants as newer residents will leap-frog over them and get rehoused more quickly.

**The proposed 2-year residency requirement was made in line with guidance from the Government. All applications are assessed on need and existing applicants will retain their registration date, so they will not be disadvantaged compared to newer applicants.**

Another concern was that the policy would encourage more people to apply for rehousing, resulting in even more pressure on the housing register and longer waiting times for existing applicants.

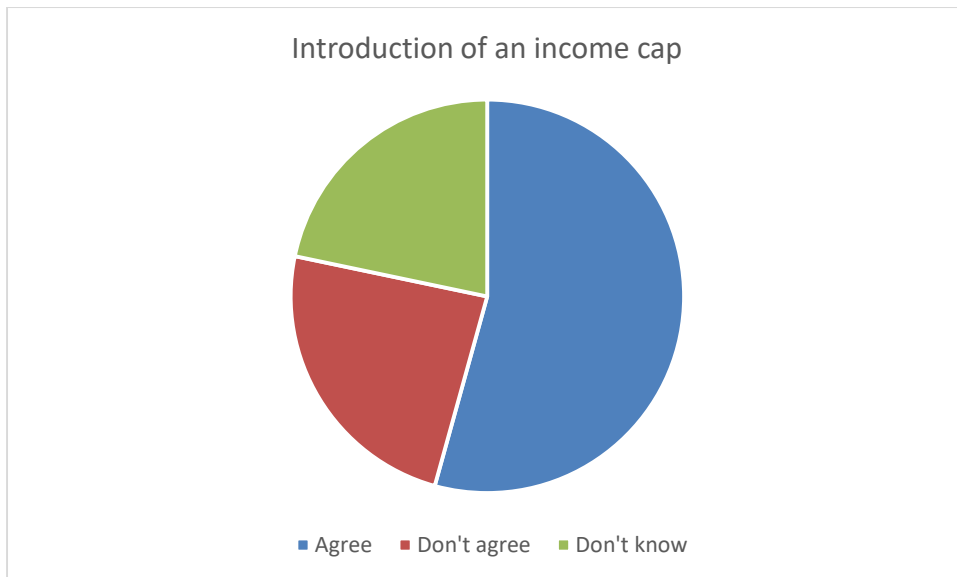
- This will make the situation worse as it will mean more people applying, increased demand and a longer wait for rehousing.
- This will lead to more non-British nationals seeking housing in the area.
- It will encourage more homeless people to come here from other areas.

**The Council is actively trying to prevent people from being made homeless so that they can get an offer of social housing and to ensure that the Housing Allocation Policy works alongside the Homeless Reduction Act 2017 to reduce homelessness. The issue is that a longer residency period increases homelessness applications as people not meeting the current residency qualification can apply to the Council as homeless, which enables them to register and bid for social housing property with a local connection of only 6 months. A shorter qualifying period will mean that more households will consider making a housing register application rather than seeking to resolve their housing issues through a homeless application. The Housing Act allows people who are legally entitled to be in the UK to apply to the Housing Register, providing they meet local residency requirements.**

#### Proposal 4. Introduction of an income cap

Over half of respondents (54%) agreed with the proposal to introduce an income cap, with the remaining responses split between disagree (24%) and don't know (22%).





The survey also asked whether the proposed income caps were set at the right level. In response, 62% agreed that they were, 21% thought they were too high and 17% too low.

#### **Comments made by respondents (officers' responses below in bold)**

Those disagreeing with the proposal questioned whether households earning higher incomes above the proposed caps could afford to move into private rented accommodation.

- Cost of living increases mean that even if your earnings appear to be high you may not be able to afford private rented accommodation due to high cost of deposits, advance rent, furnishings, bills, poor credit history.
- Need to take into consideration individual circumstances - households may have high child maintenance payments or a poor credit history or high outgoings.
- It's unfair to households with lots of children who cannot afford a large property.

**The levels that we are proposing are 4 times the local housing allowance and in most cases it is considered that households with incomes above this level will be able to afford private accommodation. We have decided to adopt different income caps in relation to the size of the household, as we recognise that larger families will need a higher income to afford market housing. The policy does allow for exceptions in individual cases and may consider child maintenance payments and other exceptional outgoings as part of the assessment.**

Some people queried whether the income caps recognised that some affordable rented properties require you to have a high income:

- It doesn't make sense as many properties on MyChoice require you to have a high minimum income in order to bid for the property.

**Even for those properties where a minimum income level is specified, the incomes required are well below the proposed income caps and so this would not present a problem.**

Most of the other comments were about how the income caps would be implemented.

- You should only count net income after tax and NI, not gross earnings.
- This could disadvantage older people who receive a retirement lump sum payment.
- Caps should be increased with inflation each year.

**The income caps are based on an assessment of gross income. The financial assessment would exclude things like an injury compensation payment or a retirement lump sum. It is recognised that the income caps will need to be updated over time.**

#### Proposal 5. Removal of additional priority for working households

More people disagreed with the proposal to remove the additional priority given to working households above non-working households. 38% of respondents agreed with the proposal compared to 44% that disagreed.

However, quite a lot of the comments made by people who said they disagreed with the proposal recognised that the current working priority policy could be unfair to households that were not able to work. There also seemed to be some confusion or misunderstanding about what the proposal was, as some thought it meant that working households would lose all of their existing priority.

#### **Comments made by respondents (officers' responses below in bold)**

The most frequent comment among those who disagreed with the proposal was that working households 'deserved' to be awarded a higher priority and that this helped to reinforce the positive value of work.

- People who work hard to pay their rent are contributing members of society and should be rewarded.
- Working people who pay their own rent are more reliable tenants than those who rely on benefits.
- Social housing was built for low income working households.
- It would remove the incentive to work instead of relying on benefits.
- People who are working are often worse off than those on benefits and so should be prioritised.

**Although some of these comments reflect common views about people in work and people on benefits, there is no substantive evidence to support some of the claims. The proposed change seeks to ensure that priority for rehousing is based on assessed housing need alone, without other criteria such as whether applicants are working or not adding a further layer of prioritisation. Working households will still have an advantage over those**

**in receipt of benefits in bidding for properties let at affordable rents, as only those in work are likely to meet the minimum income needed for these properties.**

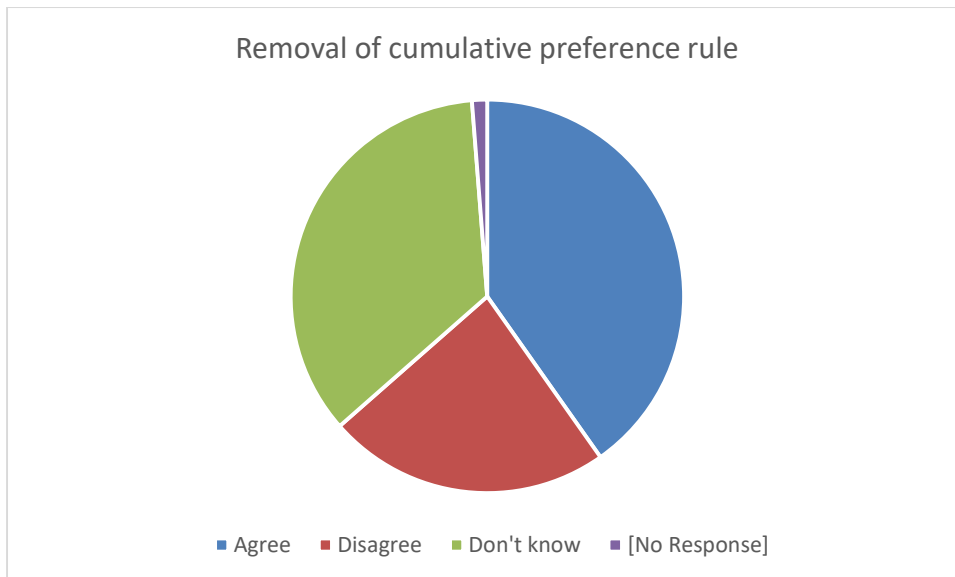
Many of the responses made, even by those that disagreed with the proposal, recognised that the current policy is unfair to some households that cannot work. Even where it was considered that working people should have priority, some said there should be exceptions for people who genuinely cannot work, e.g. due to severe illness or disability or caring responsibilities. Others went further than this, commenting that the policy was potentially discriminatory.

- People who are sick, disabled, have additional needs require social housing even more than someone healthy and able bodied.
- Some people cannot work due to disability which means that working people have more priority and that cannot be right as it discriminates against disabled people.
- It's extremely unfair to favour an able-bodied working individual, over a disabled person who cannot work, which is prejudiced against disabled people.
- Some people could be waiting so much longer through no fault of their own.

**These comments highlight a significant issue with the current working households priority, that it unfairly discriminates against non-working households. There is some evidence from other areas that policies favouring working households breach equalities legislation as they have a negative impact on groups with protected characteristics, e.g. people with a long-term illness or disability and people with children. This is a strong reason to end this policy.**

#### Proposal 6. Removal of the cumulative preference policy

41% of respondents agreed with the proposal to end the cumulative preference rule which gives additional priority to those with 3 or more band reasons. 24% disagreed with the proposal and 36% said that they did not know. The high number of 'don't knows' is evidence of the complexity of the policy which is not well understood by many people.



**Comments made by respondents (officers' responses below in bold)**

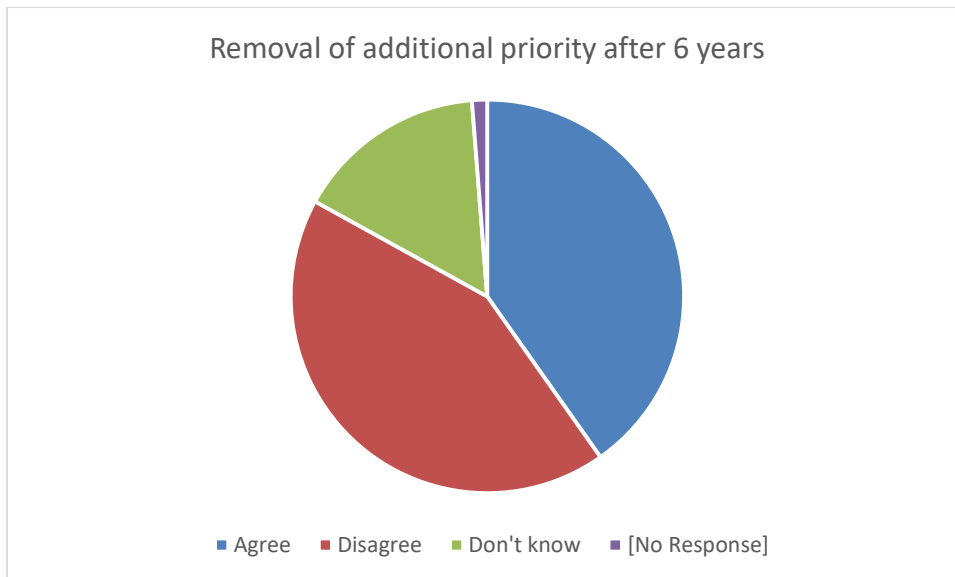
The most common reason for disagreeing with the proposal was the view that households with multiple needs are likely to have a higher need for rehousing than those with just one need, and should get a higher priority for rehousing.

- Policy should remain as some people have complex needs and more than one issue.
- People who qualify on 3 or more grounds clearly have more or higher needs and so should receive additional priority.
- The policy has the benefit of the old points system in recognising and adding together all needs.
- The policy should be retained as it allows people's different circumstances and specific needs and factors to be taken into account in the banding system.

**The main impact of the current policy is to enable households with a relatively low level of need to add together various factors with a view to securing a higher banding. The policy allows these households to be placed in a higher band alongside households that have a higher assessed need for housing; this contributes to longer waiting times for those in that band. Under the new proposed policy, a composite assessment of the household's housing situation will take place and ensure that multiple needs are considered; however only one banding will be given.**

Proposal 7. Removal of the policy giving additional priority after 6 years.

Respondents were split almost evenly between those who agreed with the proposed change (41%) and those that did not (43%), with 16% replying 'don't know'.



### Comments made by respondents (officers' responses below in bold)

For those that disagreed with the proposed change, the most common reason was the view that people who have been waiting that length of time clearly have a high need to move and deserved to be given priority.

- No family should be waiting more than 6 years to be housed. If they have been waiting this long then they should have priority.
- Those waiting a long time should be given priority over those who have been waiting less time or have just joined the register.
- If overcrowded households do not get this additional priority their children will be too old by the time they get rehoused.

**We will be addressing some of the concerns raised above by ensuring that the most overcrowded households (and others in high need, e.g. with severe medical needs) are awarded a high priority on the housing register to enable them to be rehoused more quickly. This is a fairer way of addressing the issue of long waits than a blanket policy that gives additional priority to all households waiting 6 years regardless of their housing need. It is considered unfair that those with a low housing need are awarded a higher priority after six years, as happens under the current policy, as this will have the effect of increasing waiting times for other households with a higher assessed housing need.**

Other common reasons for disagreeing with the proposal was the view that households waiting for six years would be penalised or have their priority removed and also that it removed the hope of being rehoused after six years.

- Households that have been waiting a long time for a new home should not be penalised because there's not enough housing available.
- They shouldn't lose their priority and be removed from the register after 6 years.

- This will destroy the hopes of those waiting a long time who will never be rehoused especially if placed in a lower band.

**Some of these comments indicate a misunderstanding of the proposed policy change. This will still give weight to those who are in greatest need and have been waiting longest for rehousing as bids for properties are prioritised both in terms of the band (priority) awarded and in date order. Under the new policy, households would not be removed from the housing register after waiting six years; they will continue to remain on the housing register with the same effective registration date and the same level of priority. Applicants who have been waiting a long time will usually be rehoused ahead of those in the same band who have recently applied. The only reason that a household would be removed from the housing register is that they no longer have a housing need and do not therefore need to move, e.g. their circumstances have changed or they have accepted an offer of rehousing.**

#### 8. Further comments

Respondents were invited to add any additional comments that they had about the proposed changes to the policy. The most common comments are summarised here with officers' responses below in bold.

More homes especially larger homes should be built.

**Agreed, and other work is taking place to increase the provision of new larger homes.**

More should be done to help get single and older people in large homes they don't need to move.

**Agreed, but we cannot force people to move. However, we are looking to give high priority to those who want to move to a smaller property where it will release a family home and to provide increased assistance and support to help people with the move.**

Care leavers in Staying Put accommodation should be given greater priority, similar to those leaving supported accommodation.

**It is anticipated that those in Staying Put accommodation will gain time waiting whilst staying with a foster carer, as they are able to join the housing register from the age of 16. Due to registering at an early age, when the young person is ready to move from their Staying Put accommodation, they should be near the top of the housing register.**

There should be more bands or sub-bands to take account of different circumstances.

**We have made changes to the banding system in the proposed new policy to reflect a wider range of circumstances and groups in housing need and have introduced a new fifth band.**

The proposals offer nothing to those already waiting for years. It can seem pointless bidding for properties as other people constantly seem to jump ahead of me.

**The new policy could help with this. Band then date order will take precedence and the removal of existing policies giving additional priority to some households will prevent anybody assessed in the same band jumping over those who have been in the band longer.**

More needs to be done to help working people, compared to those on benefits, as they cannot afford local rents.

**Yes, it is recognised that rising private rents are making it extremely difficult for many households to afford accommodation. When it comes to higher affordable rents, these are more likely to be affordable to those in work compared to those on benefits.**

## Part 2. Feedback from the consultation sessions

To supplement the consultation on the housing allocation policy changes through the online survey, three separate workshop sessions were held with:

- Councillors
- Registered Providers (RPs)
- The Bracknell Forest Homeless Forum

The sessions were well attended. The Councillor session was attended by 17 Councillors, 10 people attended the Registered Provider session, representing 8 different RPs, and the Homeless Forum session included representatives from 10 external agencies.

The format of the sessions was similar for each group. Housing officers ran through each of the proposals in turn, including the reason for the proposed change, the issues they hoped to address and the details of the proposed policy changes and how they would be applied. There then followed a discussion and questions about each proposal and the group was asked whether they supported the proposal.

A summary of the discussion, the points raised and support for each of the proposals is given below.

### 1. Adoption of bedroom standard

Councillors asked questions about the details of the bedroom standard, including the need to ensure that room sizes were sufficient where people are sharing. Overall, they agreed that the proposal would help to manage the demand for larger homes arising from overcrowding.

RPs and Homeless Forum members indicated their support for the proposal providing that measures are in place allowing flexibility, recognising that in some cases it will not be appropriate for children to share.

#### **Comments made by respondents (officers' responses below in bold)**

Will the policy take account of minimum room sizes for people sharing?

**Minimum room standards will apply, based on the standards set out in the 1985 Housing Act. These specify a minimum floor area of 110sqf for two or more people sharing.**

Will the proposal allow some flexibility, e.g. to take account of children with a disability, recognising that it is not always appropriate for children to share?

**Yes, whilst in general children would be expected to share, exceptions would be made on medical and welfare grounds, with consideration being given to individual circumstances.**



Can more help be given to under-occupying households, by providing incentives and help that would enable people to downsize, to increase availability of larger homes?

**The proposed policy gives a high level of priority to under-occupiers in larger homes and officers are developing a package of measures to provide a package of support and assistance to encourage more people to downsize.**

## 2. Non-dependent adult children

Councillors gave their support to the proposal. RPs and Homeless Forum members broadly agreed with the proposal but wanted to see more support to enable young people to access their own accommodation, by promoting rehousing opportunities through the housing register, and providing advice and assistance and measures such as tenancy training.

### **Comments made by respondents (officers' responses below in bold)**

How would we encourage young non-dependent adults to find their own housing solutions? Could we look at a scheme which gives young people in these situations a high rehousing priority?

**Generally, we aim to assist young people by providing specific advice on their housing options, including private rented accommodation, supported housing, and applying to the housing register in their own right. The Council has just set up a new tool on its website (Advice Aid) which people in housing need, including young people, can use to get advice and assistance. We also work closely with a range of local agencies that can provide support and assistance to young people. Young people can make a separate application on the housing register from the age of 16. If they are living in an overcrowded household, they would receive a higher priority. The waiting time for a one bed property is much shorter compared to the wait for a larger 4 bed property.**

Will the proposal consider the individual circumstances of households and children?

**Yes, there would be exceptions to take account of medical and welfare issues. Also, to be clear, the policy is not saying that adult children will have to leave the family home once they reach the age of 21 but proposes that at this stage the household should not be entitled to apply for a larger property.**

What is the evidence available from other areas that have implemented similar policies?

**Experience from elsewhere suggests that where the policy has been applied it does help to free up accommodation for more overcrowded households.**

## 3. Reducing residency requirement

Councillors asked for further information about how the proposal was intended to reduce homelessness and the forms of homelessness it sought to address. RPs raised no particular concerns or issues about the proposed change. The homeless forum asked some questions about the detail of the proposal and how it would be implemented.

Overall, there was broad support for the proposed change.

#### **Comments made by respondents (officers' responses below in bold)**

How will this proposal help to reduce homelessness and which groups of homeless households?

**The most common causes of homelessness are due to loss of private rented accommodation or being asked to leave the homes of family or friends. Some of those affected have been living in the area for some time, but not long enough to meet the 4 year requirement. For these households the only way to qualify for the housing register in the local area is to apply and be accepted as homeless. A shorter residency requirement will mean that more of these households will qualify and be able to apply for housing on the housing register rather than applying as homeless.**

Will the proposal allow for exceptions where people don't meet the requirement but there is good reason to accept them?

**Yes, as with the current policy, there are a number of exceptions to the requirement, e.g. care leavers placed out of the area or older people needing to move to the area for medical or welfare reasons, plus discretion will be applied in particular circumstances.**

How would people be able to prove their residency if they had been staying in the area through informal arrangements, sofa surfing and sleeping on friends' floors?

**We would look at a range of evidence including contacting agencies that they have been in touch with that can verify they have been living in the area; also, benefit claims where these have been made. Rough sleepers would need only a 6 month local connection.**

#### 4. Income caps

Councillors supported the proposal but asked a number of questions about the level of the income caps, what incomes and savings would be included and what levels of discretion might be applied for households marginally over the caps. RPs raised no objections and indicated their support for the proposals. Homeless forum members also expressed their support for the proposal.

#### **Comments made by respondents (officers' responses below in bold)**

What income would be counted and would this impact on people receiving a large compensation payment?

**The income caps would include all income – gross earnings and benefits. Compensation payments would not be included in the assessment of income/assets.**

Will the proposal act as a disincentive to tenants seeking higher earning jobs?

**The income caps only apply to applicants and not to tenants. Once they have been rehoused there are no income limits that apply to secure tenants.**

Could people avoid the caps by deliberately earning less or working less hours at the point that their income is being checked and return to higher pay thereafter?

**Checks are carried out at two stages, when the application is made, and when an offer of housing is made, to ensure no significant change in their income and circumstances.**

Are there any statistics showing the number of households applying for social housing with high-income levels.

**There is no firm data on this, but it is estimated that the vast majority of applicants have incomes below the income caps.**

Is it possible that rising private rents (and mortgages) could mean some households with an income of over £60,000 could not afford market accommodation, and would not be able to join the housing register due to the income cap? Would discretion be applied for households at the cusp of the income caps.

**The income caps will be applied with a level of discretion and flexibility where it is evident that a household cannot afford market accommodation. It is recognised that housing costs can be very high, even for households with a good income, but is important to ensure social housing is allocated to households that will benefit more from the lower rents.**

## 5. Ending priority for working households

Councillors were in support of the proposal, following some clarification on affordable and social rent levels. RPs and homeless forum members did not raise any issues with regard to the proposal.

### **Comments made by respondents (officers' responses below in bold)**

Is it likely that non-working households will still be disadvantaged, despite the proposed policy change, because many of the new properties becoming available are at affordable rents, which they could not afford if they are on benefits?

**It is the case that working households are more likely to be able to afford affordable rented properties than those on benefits, as these are let at rents which are higher than traditional social rents. Whilst most new affordable homes over the last few years have**

**been at affordable rents, we are starting to see a shift back to new social rented homes It should also be noted that the majority of the existing social housing stock is still let at social rents.**

Are keyworkers such as teachers likely to be considered a distinct group of working households that might be given priority?

**There is no specific policy or priority for keyworkers in the current or proposed policy.**

#### 6. Cumulative preference rule

There were no concerns raised about this proposal by Councillors, RPs or Homeless Forum Members. Making the policy simpler is one of the aims here, and it was agreed that the current cumulative preference rule makes the policy unnecessarily complicated.

#### 7. Additional priority after 6 years

Councillors and Homeless Forum members recognised that the existing policy could unfairly benefit households with a lower housing need. There were some questions about the situation of households with a high housing need that had been waiting longer than six years. There were no particular concerns or issues raised by RPs.

Given that one of the key aims is to remove complexity from the policy, there was overall support for the proposal.

#### **Comments made by respondents (officers' responses below in bold)**

Would the proposal result in households losing their priority or being removed from the housing register after 6 years?

**It was confirmed that this proposal would not remove households from the housing register after they had waited six years. The proposal is that they would not get additional priority on top of what they already have.**

For households that have already been waiting 6 years, perhaps in unaffordable private rented accommodation, is the additional priority justified because of the length of time they have waited?

**As it stands, the policy is more likely to benefit households that have a relatively low need for rehousing additional priority, by raising them to a higher band. For those with a higher assessed housing need that have been waiting a long time to be rehoused, the issue is a shortage of suitable properties, which is not addressed by giving them additional priority after six years, as they already have a relatively high priority. The current policy can act to further lengthen rehousing times for households that have a high need, as it allows more households to move into the higher priority bands.**

It is understood that households with a low level of need should not necessarily be awarded a higher priority, but is it possible to filter applicants to ensure that higher need applicants can continue to benefit by being given additional priority?

**Whilst we understand the intention behind this, one of the key aims of the proposals is to try and simplify the policy so that applicants' band and waiting times are the sole factors in determining need, without having additional criteria.**