



Neighbourhoods and Environment Scrutiny Committee

Date: Wednesday, 6 November 2019

Time: 2.00 pm

Venue: Council Antechamber, Level 2, Town Hall Extension

This is a **Second Supplementary Agenda** containing additional information about the business of the meeting that was not available when the agenda was published.

Access to the Council Chamber

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Filming and broadcast of the meeting

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Membership of the Neighbourhoods and Environment Scrutiny Committee

Councillors - Igbon (Chair), Azra Ali, Appleby, Butt, Flanagan, Harland, Hassan, Hughes, Jeavons, Kilpatrick, Lynch, Lyons, Razaq, Sadler, Strong, Whiston, White and Wright

Second Supplementary Agenda

- 5. Housing Allocations Policy Review** 3 - 60
Report of the Strategic Director, Growth & Development

This report describes the Council's review of the social housing Allocations Policy and recommends changes to enable the city to best meet housing need within a backdrop of reduced turnover of stock.

- 6. Update on Homelessness and Housing** 61 - 70
Report of the Director of Homelessness

This report provides an update, subsequent to the report to Neighbourhoods and Scrutiny on the 17th July 2019, on the work that is taking place to tackle homelessness and rough sleeping in the city. The focus of the report reflects the concerns and questions raised by Members at previous meetings of the committee.

Further Information

For help, advice and information about this meeting please contact the Committee Officer:

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This supplementary agenda was issued on **Friday 1 November 2019** by the Governance and Scrutiny Support Unit, Manchester City Council, Level 3, Town Hall Extension , Manchester M60 2LA

Manchester City Council Report for Information

Report to: Neighbourhoods and Environment Scrutiny Committee - 6 November 2019
Executive - 13 November 2019

Subject: Housing Allocations Policy Review

Report of: Strategic Director, Growth & Development

Summary:

This report describes the Council's review of the social housing Allocations Policy and recommends changes to enable the city to best meet housing need within a backdrop of reduced turnover of stock.

Recommendations:

The Neighbourhoods and Environment Scrutiny Committee is invited to comment on the report and endorse the recommendations to Executive as detailed below.

The Executive is recommended to:

1. Note the statutory and online consultation responses received.
2. Approve the changes to the Housing Allocation Policy (the Policy) recommended within this report.
3. Delegate to the Head of Housing Services and the City Solicitor approval to complete the final and lawful version of the Policy.
4. Note that the Equalities Impact Assessment shows no unintended or disproportionate effects are likely to arise for applicants with protected characteristics.

Wards Affected: All

Environmental Impact Assessment - the impact of the issues addressed in this report on achieving the zero-carbon target for the city
n/a

Manchester Strategy outcomes	Summary of how this report aligns to the OMS
A thriving and sustainable city: supporting a diverse and	Provide advice and information around other housing options where this may be appropriate -

distinctive economy that creates jobs and opportunities	this includes affordable home ownership and the private rented sector.
A highly skilled city: world class and home grown talent sustaining the city's economic success	n/a
A progressive and equitable city: making a positive contribution by unlocking the potential of our communities	Ensuring the Policy assists with balancing communities and encouraging potential in partnership with RP partners, using Local Letting Policy where necessary.
A liveable and low carbon city: a destination of choice to live, visit, work	Encouraging RP partners to reduce CO2 emissions and reduce their use of plastics will contribute to a low carbon city as well as zero carbon social homes built. Discussing climate change conversations with tenants of social housing supporting them in adopting a low carbon lifestyle
A connected city: world class infrastructure and connectivity to drive growth	Ensuring people have a settled home that's right for them this will enable them to flourish and contribute within the city.

Full details are in the body of the report, along with any implications for

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

Financial Consequences – Revenue

It is estimated that approximately £30k will be required to deliver the remainder of the project, this will cover I.T costs, training and applicant communications.

- I.T, 20 days x £650 = £13,000
- Project Officer Post, 3 months grade 7 £3,000 = £9,000
- Communications = £8,000

Total = £30k

The Council will receive a contribution from Manchester Move partners of £22k leaving an outstanding balance of £8,000 to be covered by the Council

Financial Consequences – Capital

None

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Background documents (available for public inspection):

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy please contact one of the contact officers above.

- Manchester Allocations Policy 2011
- Housing Act 1996
- Homelessness Code of Guidance <https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities>
- Allocations Code of Guidance
<https://www.gov.uk/government/publications/allocation-of-accommodation-guidance-for-local-housing-authorities-in-england>
- Update on Homelessness and Housing, Neighbourhoods and the Environment
 Scrutiny Committee Report – Wednesday 17th July 2019

1. Introduction

- 1.1 Manchester's current Housing Allocations Policy was introduced in 2011. There have been some minor amendments since but the Policy has remained fundamentally the same for the last 8 years. These amendments were approved by the Director of Housing in consultation with the Executive Member responsible for housing at the time and as per section 4 of the current policy (Directors Discretion).
- 1.2 Although the Council and its Registered Provider (RP) partners are embarking on an ambitious programme of new build development through the Housing Affordability Strategy to increase supply, fundamental policy changes are required to improve how we meet needs with the resources that we have available.
- 1.3 This report provides the context and evidence as to why the Allocations Policy needs to be reviewed, looking at how the turnover of social housing has reduced within a backdrop of increasing demand. It describes the process of engagement with stakeholders to develop a range of policy solutions ensuring that the proposals do not have a disproportionate effect on applicants within protected characteristic groups. It also describes how the proposals were consulted upon with both statutory organisations and the wider public with the outcome being a well considered set of recommendations.
- 1.4 Subject to approval by Executive there is a summary of the next steps and an outline timetable for the introduction of a new Housing Allocations Policy.

2. Context & Background

- 2.1 Manchester's housing situation has changed significantly since 2011. There has been a significant rise in homelessness and the associated cost of the rising number of households in temporary and supported accommodation is unsustainable. Welfare reforms and rising private sector rents are huge challenges for people seeking new homes.
- 2.2 Turnover and availability of social homes has reduced significantly the total number on the households on the housing register has risen by 27% over the last 4 years, whilst we have seen a 21% decrease over the same time in the number of homes that have become available for letting. At the same time the stronger and more integrated partnership working that has developed has led to a greater understanding of complex housing needs.

This table shows the increase in demand and reduction in lettings over the last 4 years:

Year	Total number on Register	Total in Reasonable Preference (band 1-3)	Number of Lettings
2015/16	11559	4612	3356
2016/17	12292	5028	2864
2017/18	13461	5005	2867
2018/19	14648	6144	2644

Legal Context

2.3 Part 6 of the Housing Act 1996 requires local authorities to have an Allocations Policy that describes how social homes should be allocated in the authority's area and to give "reasonable preference" to certain groups of applicants:

- People who need to move on welfare or medical grounds,
- People who need to move to a particular area of the borough to avoid hardship,
- People living in overcrowded, insanitary, or otherwise unsatisfactory housing, and
- People who are homeless within the meaning of Part 7 of the Housing Act 1996

2.4 Priority can be given, and allocations can be made to, categories of applicants who do not fall within the reasonable preference groups (for example current tenants who are under-occupying their current homes), however, we must ensure that the reasonable preference requirement is met and we must ensure that any locally-determined priority categories do not dominate the Policy such that the statutory reasonable preference categories have relatively little chance of being rehoused.

2.5 The Manchester Housing Allocations Policy sets out the principles and rules by which people apply for social housing, including who qualifies to join the housing register and how the Council prioritises who gets a home. In simple terms, Manchester's current Allocations Policy operates in this way:

- Band 1 is applicants in real housing need (reasonable preference) who are in very urgent or emergency need to be rehoused.
- Band 2 is applicants in real housing need (reasonable preference) who make a contribution to their community.
- Band 3 is applicants in real housing need (reasonable preference) who do not contribute to their community.
- Band 4 is applicants not in real housing need (not in the reasonable preference groups) but who make a contribution to their community

- Band 5 is applicants not in real housing need (not in the reasonable preference groups) and who do not contribute to their community.
- Band 6 is comprised of applicants demoted from bands 1-5.

2.6 The 3 main reasons for being in need of rehousing are:

- Overcrowding (around 75% of overcrowding applicants are 1 bedroom short)
- Homelessness/ready to leave Temporary Accommodation and Supported Accommodation (TA & SA)
- Medical needs

Demand and Turnover of Social Housing

2.7 Across Manchester an increasing number of individuals and families are becoming homeless and are at greater risk of homelessness. The main reason for statutory homelessness is the loss of a tenancy in the private rented sector which has become the number one cause above domestic abuse.

2.8 Government welfare changes, which include capping personal benefits and limiting the amount payable in rent via the Local Housing Allowance, have had a major impact in contributing to the loss of tenancies and the growth in numbers on the housing register.

2.9 The Council currently has 1,522 (July 2019) dispersed temporary accommodation properties spread across Manchester and Greater Manchester.

2.10 Although the existing Policy was set up with the best intentions, the Policy has now developed unintended consequences and instead of helping people most in need the Policy is now causing a barrier in accessing homes for vulnerable households. As we can see by the numbers of households within temporary accommodation they are increasingly waiting for long periods to access social housing, causing a lack of throughput and rising costs.

2.11 The currently Policy rewarding those that work or contribute to the community with additional priority and placing them in band 2, leaving those who are often in crisis, cannot work and in insecure temporary accommodation in band 3 and having to wait for long periods to be rehoused, The average waiting time for a household to move out of temporary accommodation can be between 12-18 months.

2.12 **Appendix 1** Shows the data from the Manchester Housing Register (MHR) and lettings statistics from the year 2018/19 and gives a real sense of how demand is outstripping the number of available properties. This is a summary of the key facts:

2.13 **Key Facts**

- The total number of live applications on the Manchester Housing Register continues to increase.
- The number of applications in reasonable preference (housing need bands 1-3) is continuing to increase - over 5000 and far outstrips supply, only 2282 lettings to the same bands in 2018/19.
- The turnover of stock (this equates to lets) has reduced each year for the last 4 years - 2018/19 was the lowest since 2013.
- The vast majority of lets are to applicants in reasonable preference (over 90% of all lets) but this is still under half the number of households in this group.
- The availability of larger family homes means that most applicants for 4+ bedroom homes will not be rehoused through the register for a considerable length of time, if at all.
- Increase in numbers of people living in insecure temporary accommodation
- Right to Buy contributing to the reduction in numbers of social housing stock.
- The increasing number on the register and reduced turnover means that even those applicants in need (reasonable preference) cannot be assured of being rehoused. Some applicants in housing need will remain on the register for years and might never be rehoused.

3. Engagement and Consultation

- 3.1 Over the last year a dedicated project team led by Strategic Housing and made up of Council and Registered Provider (RP) officers has reviewed the current Housing Allocations Policy.
- 3.2 One of the first tasks for the team was to establish policy objectives so that it could effectively deliver a Policy that is legal, reflects the current housing position and assists with meeting corporate priorities.
- 3.3 These objectives were that the Policy:
- Continues to accord with legislation and statutory guidance.
 - Provides the means of managing the allocation of a scarce resource (social housing) in a fair and equitable manner assisting those in most need.
 - Is transparent and easy to understand.
 - Takes into account the need to manage neighbourhoods.
 - Takes into account the Homelessness Reduction Act, welfare reforms and the city's Homelessness Strategy.
 - Will assist the city deliver its wider commitments in the City Strategy ("Our Manchester") and the Housing Strategy.
 - Continues to comply with local authority equality duties.
 - That there is no unintended adverse impact on other housing practice.
- 3.4 By analysing data and information from both qualitative and quantitative sources the team have been able to use this information to facilitate a series of discussions at the Housing Access Board (HAB, which consists of all the major

social housing providers in Manchester). This helped everyone to understand how the current Policy impacts on access to social housing for various need groups that make up the housing register, highlighting specific issues and unintended consequences.

- 3.5 Discussions throughout the process have been challenging. Everyone taking part recognised that any proposal to increase the priority of any particular group of applicants would almost inevitably have an adverse effect on another group of applicants carrying out Equality Impact Assessments (EIA) to mitigate any adverse consequences. Nevertheless, discussions always focussed on the objectives of helping those in greatest need. After months of very careful and well-informed deliberation Members, Council officers and RP partners agreed to put forward a series of policy changes for statutory and public consultation.

Policy development and engagement timeline

- 3.6 This is a summary of the work and meetings that have been carried out to get to the current position to date.

- **June-Aug 2018:** Workstream meetings were held to discuss how the current Policy impacts on access to social housing for various need groups that make up the housing register. Discussions went on to identify possible options that could offer solutions to a revised Manchester Policy.
- **Sept 2018:** Progress and options were presented to meetings of the Housing Access Board.
- **Jan - Feb 2019:** These options were more fully developed by officers and taken back to partners via the Housing Access Board and the work stream in order that partners' views, preferences and positions can be understood.
- **March 2019:** Policy proposals agreed
- **June to Aug 2019:** 12 week Statutory and wider online consultation concluded end of August.
- **Sept 2019:** Local meetings held with RPs and ward members to discuss any specific localised issues and finer policy details.
- **Oct 2019:** Final meetings held with RPs to discuss consultation feedback and agree to final recommendations.

4. Proposed Changes

- 4.1 While undertaking the review the challenge has been to differentiate between different high priority (reasonable preference) groups of applicants, giving some a higher priority in a new Allocations Policy.

- 4.2 The main proposed changes fall into three categories:

- qualification rules,
- priority for those who qualify
- banding structure.

- 4.3 **Appendix 3** is a summary table that shows current Policy, the suggested amendment, potential impact alongside the result from the public consultation, with the recommendation decision. Further narrative of the changes can be found below.

Qualification to join the register

- 4.4 Housing authorities can specify qualification rules. Applicants cannot join the housing register if they do not meet the qualification rules. The proposed changes to qualification are:
- 4.5 To introduce a two year continuous residency qualification. The current rules allow anyone with a Manchester postcode to qualify to join the register.
- 4.6 To reduce the qualifying savings threshold from £75,000 to £30,000 but with the same exceptions as in the current Policy for example: older people wishing to move to older persons or extra care housing, households that need adapted properties that can't be financed from savings or capital, households in mortgage arrears who have followed appropriate advice but are in priority need, and relationship breakdown where the applicant's potential capital gain from the sale of a property does not reach the threshold.
- 4.7 To make home-owners non-qualifying for the policy, subject to continuing to apply the current exceptions (for example applications from people who are not able to cope in their current home due to disability)

Changes to band categories - Community contributions/working household (additional priority) - current bands 2 and 4

- 4.8 Working, volunteering, young person pre-tenancy qualification and positive residency all currently result in additional priority for applicants moving from band 3 to band 2 or from band 5 to band 4.
- 4.9 This element of the current Policy is a major factor as to why people in temporary and supported accommodation (TA and SA) are far less likely to be able to make a successful bid for a home and why the numbers in this cohort are increasing considerably. Often people living in insecure accommodation and in crisis are unable to work or volunteer so do not have the opportunity to receive band 2 additional priority, extending their wait for accommodation.
- 4.10 Ending this award of additional priority band 2 will enable some people to access accommodation more quickly and whilst this will not solve the temporary accommodation crisis fully it will offer a greater opportunity and flow through the allocation system.
- 4.11 Partners noted that retaining any additional priority in the form of a higher band will mean that the current barriers to rehousing more people from temporary accommodation will stay in place since most homeless households are in crisis and will not qualify for the award.

- 4.12 The proposed Policy removes all additional priority for contributions, instead focussing exclusively on housing need.
- 4.13 This change reduces the number of bands from 7 in the current Policy to 5 making the process much easier to navigate for applicants as well as easier to administer for stakeholders.

Priority for Housing - Overcrowding & Lodging

- 4.14 The current Policy differentiates between different degrees of overcrowding. Applicants who are 3 or more beds short are in band 1 and those that are 1 or 2 bedrooms short are in band 2 or 3.
- 4.15 This proposed change differentiates between different degrees of overcrowding:
- Overcrowded by 3 or more bedrooms remain in band 1
 - Overcrowded by 2 bedrooms remain in band 2
 - Overcrowded by 1 bedroom placed in new band 3
 - Households with children overcrowded by 1 bedroom and living in 1 bedroom accommodation awarded band 2

Lodgers who are applying to join the register as a separate household will be categorised as:

- If lodging in another family's household and overcrowded by 1 bedroom, band 2 will be awarded.

Priority for housing - Homelessness Prevention duty

- 4.16 Currently these applicants are in bands 2 and 3 alongside those in more urgent housing need including those in TA & SA. Many are working and this may mean that a number of these households are placed in band 2 above homeless families in TA.
- 4.17 The proposed Policy will provide this group of applicants a lower priority than the other homelessness duties, this is in recognition that they have homes and are being supported to prevent them having to leave - new band 3 will be awarded.

Child at Height

- 4.18 The current Policy gives priority to families with children under 16 living in high-rise accommodation. This also means that homes above ground level are not let to families with children under 16.
- 4.19 Some homes are suitable for families with older children and opening up these opportunities is especially helpful for housing homeless families.

- 4.20 The current Policy was amended to give flexibility to RPs to decide if a low-rise home is suitable for children 10 or over, while recognising that such families would still have priority until the Policy review formally converted the current flexibility into policy. The proposal is simply to make that anticipated change.

Priority for housing - No housing need

- 4.21 Currently, applicants with no housing need are in bands 4 and 5. The vast majority of lets are made to bands 1-3 and 95% of households in bands 4 and 5 will never be rehoused via the register.
- 4.22 The proposed change allows applicants in no housing need to join the register (in band 4) but restricts bidding for general lets to the reasonable preference bands in the first instance and will only allow bids from bands 4 and 5 if no suitable priority bids are made. There can be exceptions for specific policies (e.g. sheltered or older persons housing).

Additional policy inclusion following consultation - Moving Group

- 4.23 Currently there are no rules around who can be on a household's application to move. This means we currently have applications that require large accommodation that does not exist or is in short supply. By allowing large extended families to apply for rehousing creates an expectation that social housing will be available when the reality is quite different.
- 4.24 The feedback received also suggested that some households add family members to applications to obtain larger properties, therefore we need to make sure we are making the best use of stock. This Policy is aimed to tighten the rules on who can apply and to make sure that appropriate sized homes are being allocated to households who genuinely need them.
- 4.25 Below is a summary of the new Policy that has been agreed between the Council and the RP project working group.
- 4.26 Who can be included in a household and part of an application:
- The spouse, civil partner or partner of the applicant.
 - Any adult relative living with the applicant who is dependent on them for care and support or who provides care and support to them.
 - Children of applicants, as long as they are aged under 21 and normally live with the applicant.
 - Grown up children who have continuously remained a member of the applicant's household since they reached 21.
 - Carers, if they need to live with the applicant to provide overnight support.
 - Any two people who wish to live together in non-family type accommodation.

Who will not be included as part of an application:

- The applicant's child or children aged over 21 living with the applicant, not in relevant education and who has not lived continuously with the applicant as part of the household. These residents will not normally be considered as part of the household and would be required to make their own application to the housing register.
- Any friends currently living with the applicant unless they are only bidding for non-family type accommodation, which will be notified in property advertisements.
- Extended family members, lodgers or sub-tenants currently living with the applicant.
- However there will be exceptions to these requirements which will be considered on a case by case basis by the relevant senior officer.

5. Statutory and Public Consultation (Feedback Summary)

5.1 Following the development of the policy options and as required by the Housing Act 1996, the Council set about a 12-week consultation process with our RP partners. Under the Act there is no requirement to consult with the wider public, however we chose an "Our Manchester" approach. We really wanted to know what the wider public, specifically current applicants, thought of the proposals. We gave the public the chance to comment on the fundamental changes on the Council's website through the "have your say" webpage.

5.2 Manchester Move sent out mail shots to all applicants on the current register and the Council wrote to all commissioned services and the voluntary sector. The consultation was also publicised both locally and nationally in the press.

5.2.1 The statutory consultation with RPs was substantial and included releasing a first draft of a revised Policy (as per guidelines). The public consultation was concise and succinct and the online survey included possible fundamental changes that would have the most impact including:

Changes to who can qualify to join the register:

- Changing the rules so that you must have been a resident in the city for a continuous 2 year period.
- Reducing the amount of savings you can have from £75,000 to £30,000.
- Changing the rules so homeowners do not qualify.

Changes to the priority level awarded:

- Applicants who qualify because of overcrowding get different priority based on the level of overcrowding.
- Stop giving extra priority to households who are working or contributing to the community.

5.2.2 The online response rate was excellent with over 2500 respondents, made up from applicants, residents and organisations. The full analysis of the survey is included as appendix 1 including comments left by respondents.

- 5.2.3 Generally the response to the changes has been extremely positive and in favour of the proposed changes. The only proposed change where there was a mixed response related to the community contribution/working household priority. There was a relatively small majority in favour of removing this extra priority, as recommended.
- 5.2.4 Following the end of the consultation, meetings have been held with RP partners to discuss and analyse all feedback which has enabled the project group identify any areas of the draft Policy that may need amending. This included drafting a policy for “moving group” as set out in section 4.23 in this report and discussion to retain the current policy for under occupation, which can be seen within the table as appendix 3.
- 5.2.5 The main concern from RP’s throughout the consultation has centred on the removal of additional priority for working household & community contribution, some fear that this may destabilize communities, to mitigate this risk it has been agreed that use local lettings policies should be implemented to help maintain balance if required. However, RP’s agree that if we are going to have a policy that meets current pressures then this change will be necessary.
- 5.2.6 There will be a review of the new policy at 12, 24 and 36 months following the implementation of the policy, these reviews will identify if any of the changes have created any unintended consequences, if any are identified further solutions will be sought to mitigate these.

6. Equalities Impact Assessment

- 6.1 During and following the development of the recommendations an equalities impact assessment has continuously been carried out attempting to identify any unintended consequences of the proposed policy changes.

An Equalities Impact Assessment (EIA) considers whether any particular group of people is affected adversely as a result of a policy change which, if it does, might result in the policy being amended.

The EIA categorises each applicant (where we have the information) by

Ethnicity
 Religion or belief
 Family Type
 Pregnant or not
 Sexuality
 Disability
 Age
 And gender now compared with birth

- 6.2 Below is a summary of the much larger assessment, Appendix 4.

- 6.3 The possible impact of proposed changes is spread very evenly across the register and applicants with protected characteristics are not disproportionately affected.
- 6.4 In some cases the percentage of applicants, in a specific cohort, affected is reasonably high but the numbers are so small that they are not statistically significant.

2 years' continuous residency

- 6.5 A maximum of 46% of the reference data set (register) could be affected. In practice it will be far fewer since many will have attained 2 year residency by the time the scheme takes effect. Equally, there will be lots of publicity about the changes and anyone wanting to join the register after the changes have been approved will have up to a year to plan for the changes taking effect. The potentially affected are spread evenly across the register. No protected characteristic group is disproportionately affected.

Over £30K savings

- 6.6 Only 0.2% of the register is possibly affected (26 out of over 14,500). The greatest percentage impact on ethnic group is white/white british and these applicants are 27% more likely than average to be affected, but this is still only 18 households. The greatest impact on age group is for applicants over 65 where these applicants are 46% more likely than average to be affected, but this is only 14 households. No protected characteristic group is disproportionately affected.

Owner occupiers

- 6.7 Only 0.6% of the register (up to 92 households) could be affected by this change. The greatest percentage impact on ethnic group is white/white British, and these applicants are 29% more likely than average to be affected, but this is still only 66 households. The greatest impact on age group is for applicants over 65 where these applicants are 36% more likely than average to be affected, but this is only 40 households. No protected characteristic group is disproportionately affected.

Overcrowded by 1 currently in bands 1 or 2

- 6.8 Less than 5% of the register is likely to be affected by this proposed change. This is a maximum figure and is very likely to overstate the actual numbers who will retain band 1 or band 2 due to having other housing needs in addition to being overcrowded by 1.
- 6.9 Of the 5% the greatest percentage variation of likely impact is that of "family type - other" where 21% are more likely than average to be affected. This is because overcrowding will mostly affect households other than single person households.

- 6.10 The other higher percentage variation is that proportionately more people who described their religion as Muslim will be affected than the average - 14% more likely than average to be affected. This is still an extremely small number of the register that stand to be affected with an impact of only 100 households out of the 14,500+ register. This is likely to reflect attitudes towards family groups and household sizes. In context of such small numbers it is hard to see this as a disproportionate effect and if it is considered as such, then the relative disproportionate effect is unavoidable and is necessary to achieve the aims of the Allocations Policy review.

No housing need

- 6.11 About 30% of the register could be affected by this proposed change - 4,577 out of 14,639. All are in current bands 4, 5 and 6.
- 6.12 The impact of proposed changes is spread very evenly and applicants with protected characteristics are not disproportionately affected.
- 6.13 The overarching outcome of the assessment is that there will be no unintended consequences for any protected characteristic groups if the recommendations are approved.

7. Recommendations

- 7.1 Following analysis of the feedback from statutory and public consultation the policy changes identified in this report have been developed by the Council, RP partners and Ward Members.
- 7.2 Subject to approval of the proposed changes, it is recommended that Executive delegates to the Head of Housing Services and the City Solicitor approval to draft the final and lawful version of the Allocations Policy based on the recommended changes within this report.

8. Next Steps

Following approval by Executive, the project will move into stage 2 as follows:

8.1 I.T. (Manchester Move)

Full mapping out of the new Policy will need to take place with the Manchester Move system, to make sure the I.T functionality reflects the new Policy. This part of the project will be undertaken by the Manchester Move team working alongside Sector who own the software.

8.2 Communication and Training Plan

As with previous Allocations Policy reviews the Council will need to deal with a large number of enquiries from applicants whose priority has changed. This will undoubtedly be reflected in Members' case work. To mitigate this, as much as possible, the Council and RP partners will develop and implement a

robust communications and training plan. This will include extensive work to help applicants understand the new Policy and what it means for their application, offering advice and assistance when needed.

8.3 Re-housing Applications

Applicants will be given time to review their current application and re-register to make sure their application reflects their needs and so that they can be assessed against the new Policy and placed in the relevant priority band.

8.4 Timetable

The proposed implementation timetable is as follows:

- Dec 19 - Mar 20 I.T. changes preparation
- Dec 19 - Mar 20 Comms and Training Plan
- Mar 20 - June 20 I.T. changes & testing
- June 20 - Aug 20 System and housing options training
- June 20 -Aug 20 Re-registration of applicants as necessary
- Sept 2020 “Go live”

9. Contributing to a Zero-Carbon City

- 9.1 Discussing climate change conversations with tenants of social housing supporting them in adopting a low carbon lifestyle.

10. Contributing to the Our Manchester Strategy

(a) A thriving and sustainable city

- 10.1. Provide advice and information around other housing options where this may be appropriate - this includes affordable home ownership and the private rented sector.

(b) A progressive and equitable city

- 10.2. Ensuring the Policy assists with balancing communities and encouraging potential in partnership with RP partners, using Local Letting Policy where necessary.

(c) A liveable and low carbon city

- 10.3. Encouraging RP partners to reduce CO2 emissions and reduce their use of plastics will contribute to a low carbon city as well as zero carbon social homes built.

(e) A connected city

- 10.4. Ensuring people have a settled home that's right for them this will enable them to flourish and contribute within the city.

11. Key Policies and Considerations

(a) Equal Opportunities

- 11.1. No equalities issues – full EIA carried out, when implemented the revised policy will be reviewed at 12, 24 and 36th months for any unintended consequences.

(b) Risk Management

- 11.2. If a decision is made not to approve the recommended changes it is highly likely given the data analysis over the last four years that the number of applicants on the housing register and in housing need will continue to rise, along with the number of households placed in temporary accommodation.

12.0 Legal Considerations

- 12.1 The revised policy takes into consideration Housing law, see section 2.3 legal context. Housing case law has been considered specifically around the equalities impact of the policy revisions. It is recommended that Executive approves a delegation for the Head of Housing and the City Solicitor to approve the full and final written Allocations Policy.

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Appendix 1 Housing Register and Lettings Data

1. Manchester Housing Register (MHR)

At the end of 2018/19 there were 14,648 live applications on the housing register which is an increase of 8% since the end of December 2018. Of these, 6,144 (5934+210), or 41.8%, were in the reasonable preference categories showing that they have real housing need which represents an increase of over 1,100 (more than 22%) in bands 1-3 since the end of 2017/18

At the end of **2018/19**, the register looked like this:

	Bedroom need								
Band	1	2	3	4	5	6+	Totals		
							No.	%	
1	321	143	35	62	15	11	587	4.0	In Need
2	392	622	634	268	46	6	1968	13.4	In Need
3	1088	1035	819	367	63	7	3379	23.0	In Need
sub total							5934	(40.4)	
4	850	728	368	37	4	1	1988	13.6	No Need
5	2327	1329	702	81	12	3	4454	30.4	No Need
sub total							6442	(44.0)	
6a	81	57	42	25	5	0	210	1.4	Demoted
6b	1071	620	295	61	10	5	2062	14.1	Demoted
sub total							2272	(15.5)	
Totals	6130	4534	2895	901	155	33	14648	100	

Almost three quarters of the register needed 1 or 2 bedroom properties (**72.8% = 10,664** applicants). **3,601** applicants (**24.6%** of the register) were in the highest bands 1-3 and needed 1 or 2 bedroom properties. There is a fairly consistent three quarters of the register requiring 1 or 2 bedroom accommodation.

Adding in 3 bedroom need takes the total to **92.6%** of the register, or **13,559** applicants. Of these, applicants in the highest bands 1-3 who needed 1, 2 or 3 bedroom properties totalled **5,089** (**34.7%** of the register).

Once we look at 4, 5 and 6+ bedroom properties, demand is heavily from applicants in the reasonable preference categories (the highest bands 1-3). At the end of 2018/19 there were 845 applicants in bands 1-3 who needed larger family homes. Against the low rate of turnover for larger family homes is the fact that 148 households currently in reasonable preference categories (bands 1-3) need homes with 5, 6 or more bedrooms. Only 6 homes of 5 or more bedrooms were let in 2018/19.

2. Lettings

During 2018/19 a total of **2,526** properties became available to let through Manchester Move. The distribution across bands and size of property was as shown in the table below.

*****Band 1-3 "Reasonable Preference Housing Need"***

Manchester Move lettings 2018/19						
**Band	No	%		Bedrooms	No	%
1	586	23		1	975	39
2	1090	43		2	920	36
3	606	24		3	584	23
4	121	5		4	41	1.6
5	108	4		5	2	0.1
6	15	1		6+	4	0.2
Total	2526	100%		Total	2526	100%

The turnover of all sizes of properties has continued to fall. In 2013/14, there was a total of 3620 lets. Successive years have seen the number falling: 3546 in 2014/15, 3133 in 2015/16, 2724 in 2016/17, a slight rise to 2767 in 2017/18, and another fall to 2526 for 2018/19.

The percentage of lets to applicants in need (bands 1-3) was 84% in 2017/18. It has increased significantly to over 90% during 2018/19. Lets to households not in bands 1 to 3 are mostly to people wanting to move into sheltered or extra care accommodation along with some new build social housing policies which are let at affordable rents and targeted at working households.

3. Right to Buy (RTB)

Can also be attributed to the falling numbers of social housing stock levels xxx number over xxxx years has seen the total stock reduce by xx.

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Housing allocations policy consultation responses

Question responses

1. Are you a resident in Manchester or are you answering on behalf of an organisation?

	Responses	Percentage
Organisation	59	2.4%
Resident	2368	97.6%

2. About your organisation

2.1. Which organisation do you represent?

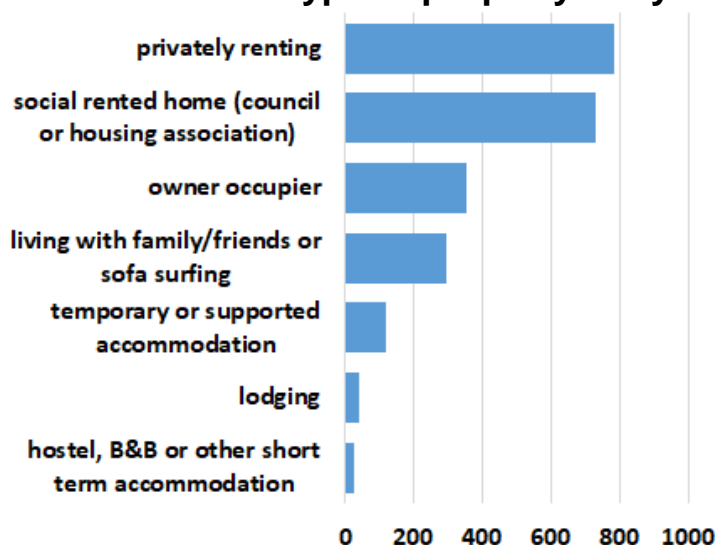
55 responses of the 59 indicating that they represent an organisation provided an organisation name and 4 were blank or test records leaving 51 responses. From the remainder there were 35 unique organisation names. These are shown in appendix 1.

2.2 What is your organisation postcode?

49 unique responses were received, 5 could not be counted (as above). The majority of organisations were located within the city of Manchester with one from Oldham and two in Stockport.

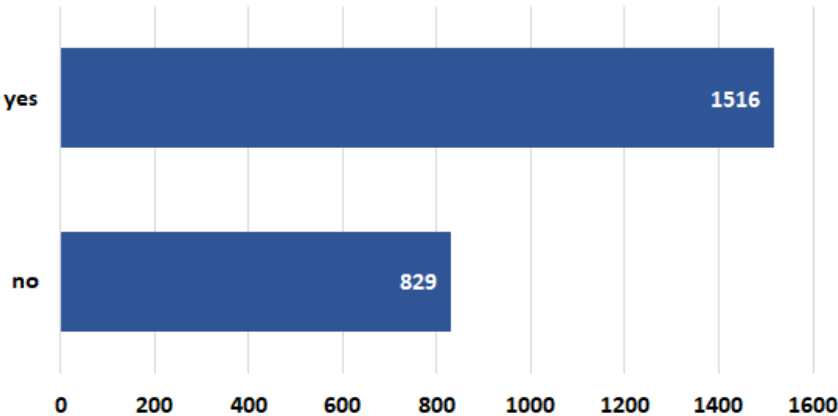
3. Residents

3.1. What type of property are you currently living in?



3.2. Are you currently registered on the Housing Register?

Housing allocations policy consultation responses



3.3. What is your postcode

The chart below shows the ward of residence of the participants who provided their postcode. 50% of participants (1194) did not provide a postcode.



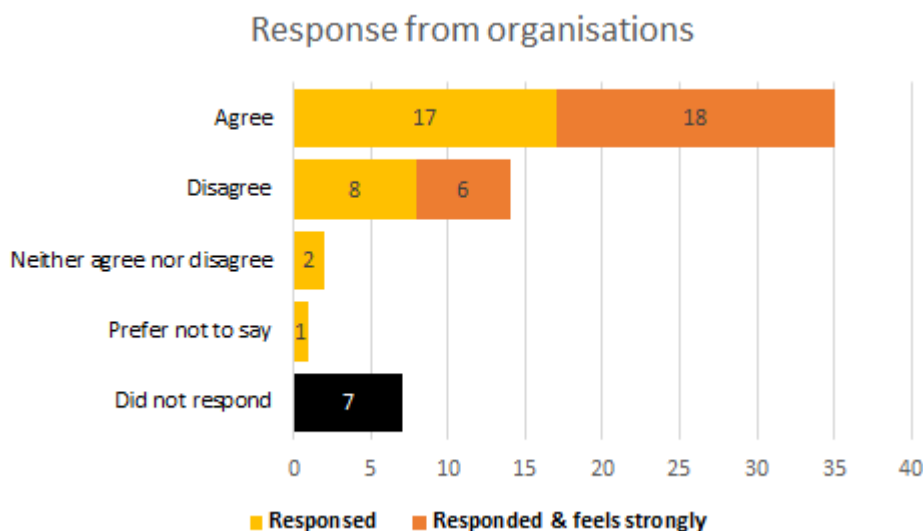
4. Changes to who can qualify

4.1. Residency

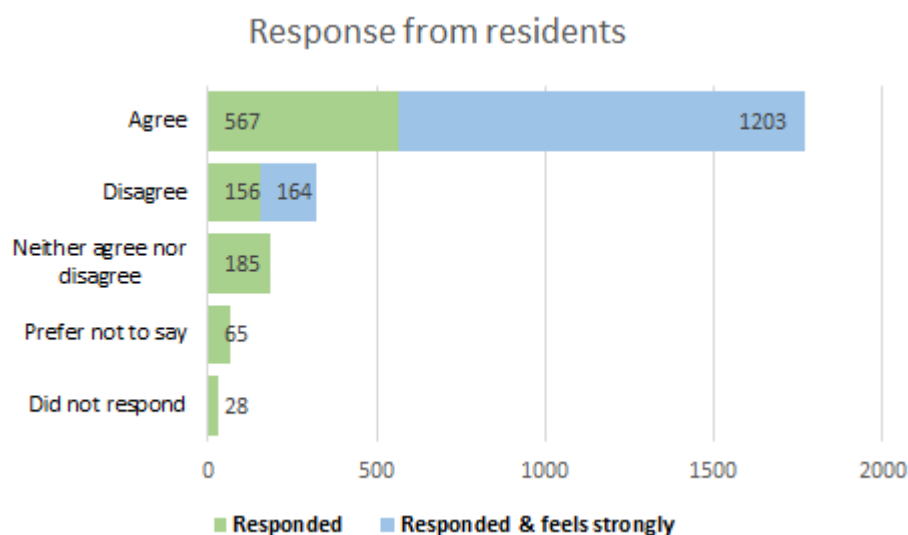
Housing allocations policy consultation responses

Central government recommends that people should have lived in the area continuously for at least two years to qualify. We don't currently follow this recommendation.

Do you agree or disagree that the Council should introduce a two year continuous residency qualification test? (subject to exceptions i.e homelessness)



Overall 2368 participants responded to this question. 35 did not provide a response, of which 7 were organisations and 28 residents.

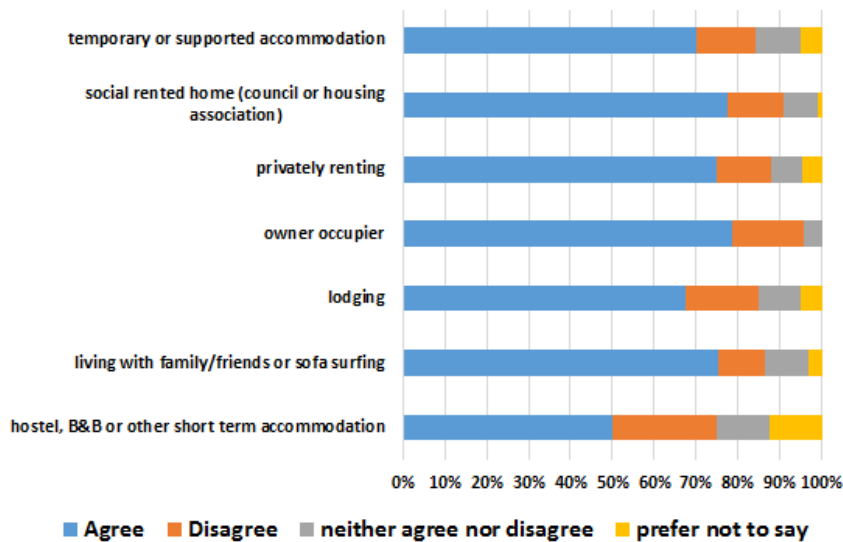


Does whether the resident is on the housing register impact on responses?

Housing allocations policy consultation responses

With this, and all subsequent questions, analysis has indicated that there is no statistical significance between responses in respect to the residents status on the housing register

Does housing type impact on responses?



The chart to the left shows the percentage of respondents who selected each response respondents for each accommodation type.

The group of residents who are least likely to agree with the statement are those housed in hostels, B&B and other short term accommodation.

Resident or organisation

Comments made by survey participants

Resident	<i>"...Agree with this but special dispensation should be given if an individual / family is new to the area having had to move due to domestic abuse/family circumstances"</i>
Organisation	<i>"Care leavers are sometimes placed out of the local authority area but have a strong connection to Manchester.. Also when someone is fleeing domestic abuse but may have lived away from Manchester but ... they have a strong connection to Manchester."</i>
Resident	<i>"...This discriminates against people who may have moved to the area for work, or for the support of family and friends. If a woman fleeing domestic abuse must stay in the same city/town or sleep on the streets where is the fairness in that?"</i>
Resident	<i>"...I think people who have lived here longer should get more priority. It causes a lot of community resentment."</i>
Resident	<i>"...Everyone should get the chance to live in Manchester if they wish to do so "</i>

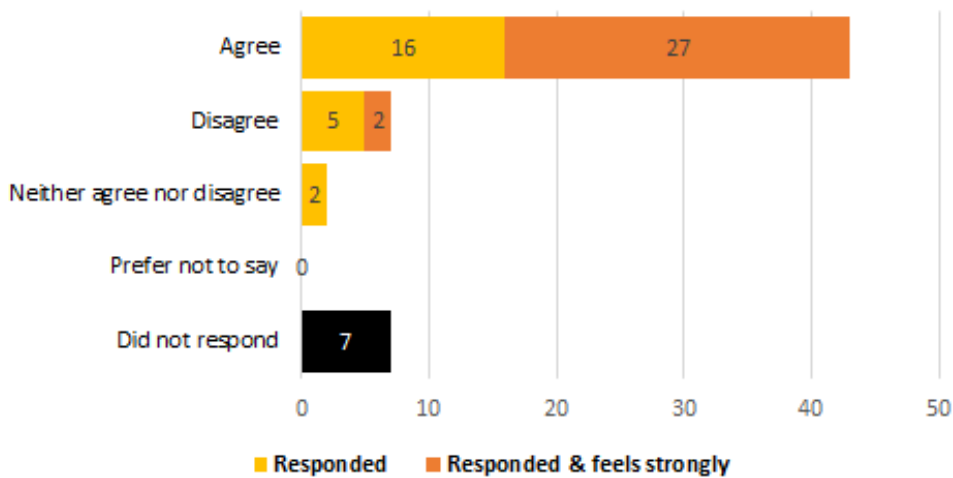
4.2. Savings

Housing allocations policy consultation responses

Currently if a household has savings of £75,000 or more they qualify to be added to the housing register, but are placed in band six. We are proposing that the savings threshold is reduced to £30,000 and anyone with more does not qualify to join the housing register.

Do you agree or disagree that we should reduce the savings threshold to £30,000 and that anyone who has more than this amount should not qualify to join the housing register?

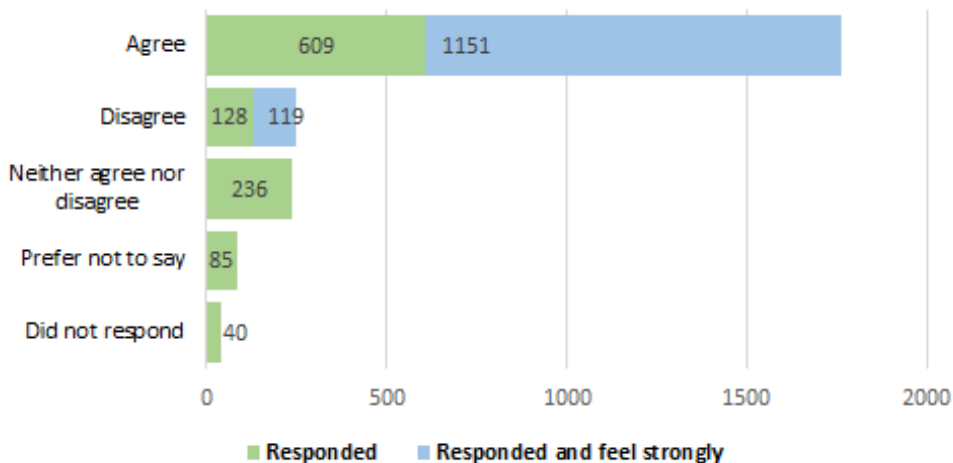
Response from organisations



Overall 2380 participants responded to this question.

47 did not provide a response.

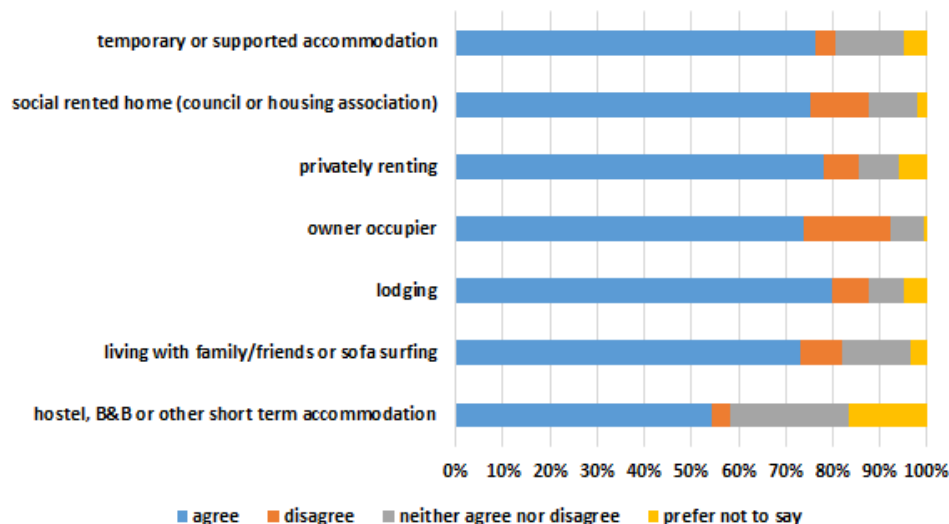
Response from residents



Of these 7 were organisations and 40 residents.

Housing allocations policy consultation responses

Does housing type impact on responses?



The chart to the left shows the percentage of respondents who selected each response for each accommodation type.

Whilst there is variation in the level of agreement there is little in the level of disagreement with the main variation between groups being seen in those not expressing an opinion.

Resident or organisation

Comment

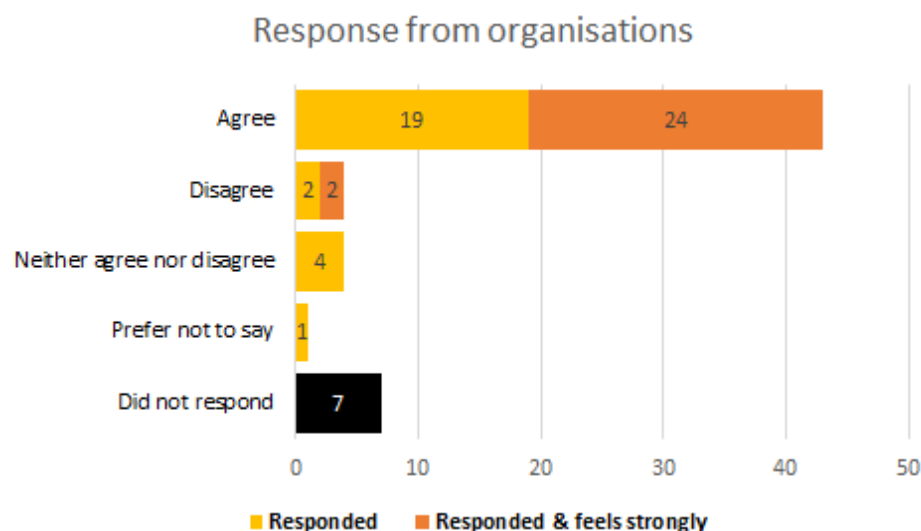
Resident	<i>"...Elderly residents who give up a large property to move into a smaller property will get penalised if they have saving over 30K"</i>
Resident	<i>"...This should be further reduced to savings less than £10,000."</i>
Organisation	<i>"...Savings should be capped at £10,000 so social housing isn't going to those who can afford to rent privately"</i>
Resident	<i>"..It's their savings and hard earned money. As long as they're paying rent nothing else matters. "</i>

Housing allocations policy consultation responses

4.3. Homeowners

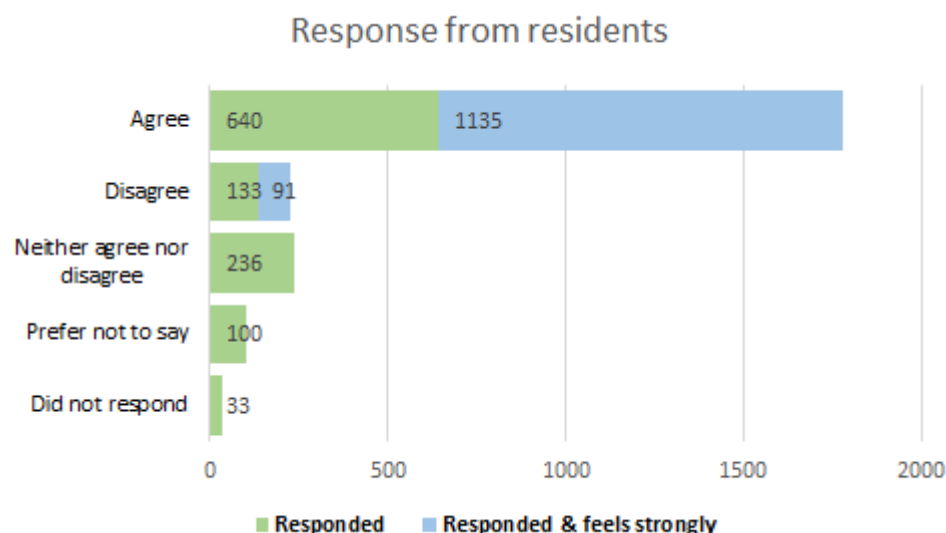
Central government recommends that allocation schemes should make home-owners a non-qualifying category subject to some exceptions for people who are not able to cope in their current home (for example due to disability). Our current scheme allows people who are homeowners to qualify to join the housing register.

Do you agree or disagree that homeowners (subject to exceptions) should not qualify to join the housing register?



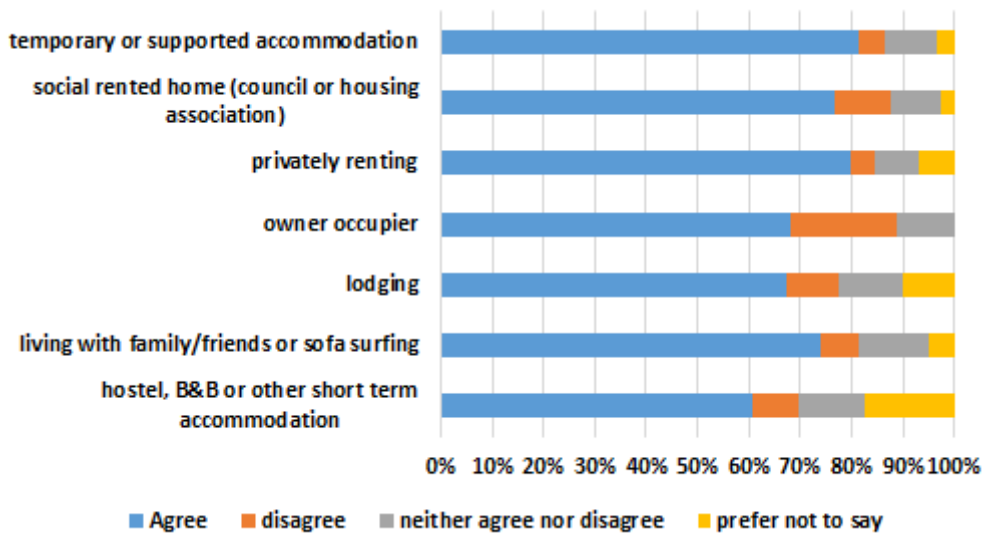
Overall 2387 participants responded to this question.

40 organisations did not provide a response



Does housing type impact on responses?

Housing allocations policy consultation responses



The chart to the left shows the percentage of respondents who selected each response respondents for each accommodation type.

Of those participants responding that they disagree with the proposal the largest proportion comes from owner occupiers.

Resident or organisation	Comment
Resident	<p>“..This scheme should be for everyone. My house is overcrowded. I need a bigger house can't afford it ”</p>
Organisation	<p>“...Social housing needs to be reserved for those most in need - if someone already owns a home they should not be able to join the register.”</p>
Resident	<p>“...If there was a reason they lose their house, they should be entitled to housing if they were at risk of homelessness.”</p>

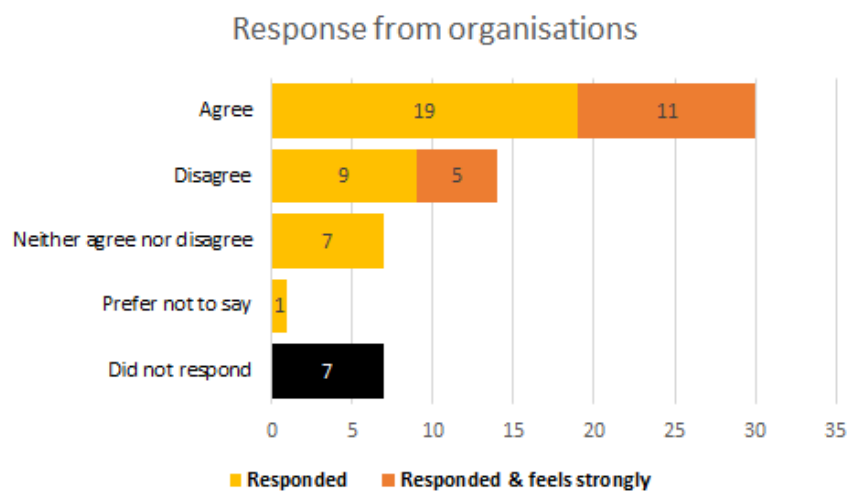
5. Changes to the priority level awarded

5.1. Overcrowding

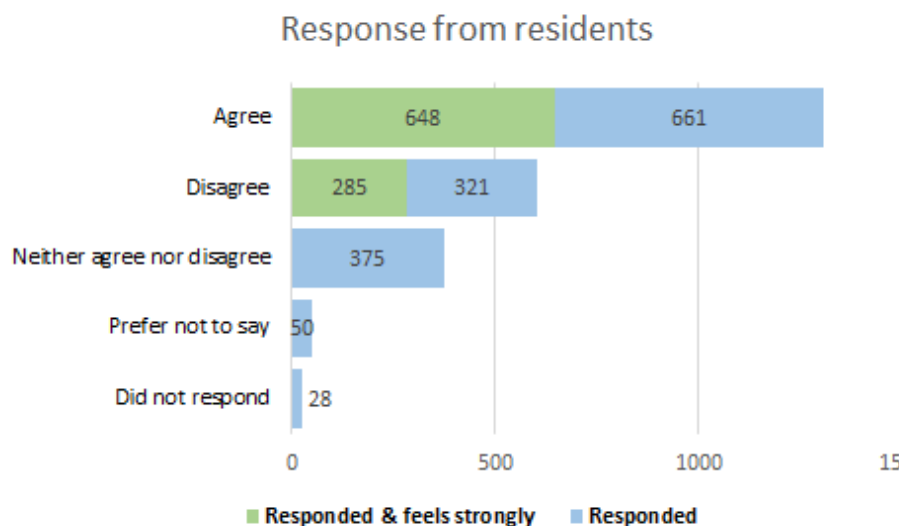
Housing allocations policy consultation responses

Currently if you are overcrowded and need three or more extra bedrooms you are placed in band one, if you need an extra one or two bedrooms you are placed in band three. To make sure that people with the greatest need are able to access a suitable home we are suggesting we award the level of priority based on the number of bedrooms needed.

Do you agree or disagree that people who are overcrowded, needing two or more extra bedrooms, should get a higher priority than those who need one extra bedroom?



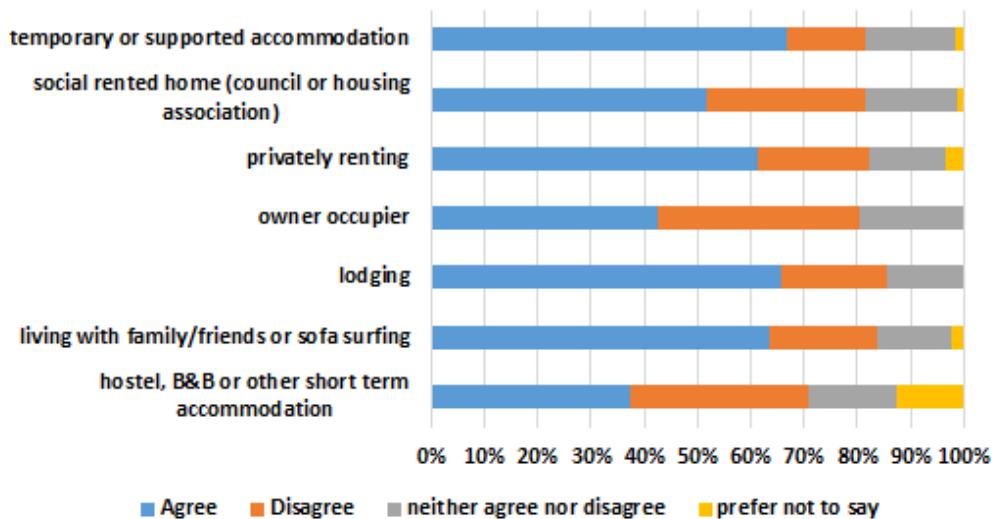
Overall 2392 participants responded to this question.



35 did not provide a response
Of these 7 were organisations and 28 residents.

Housing allocations policy consultation responses

Does housing type impact on responses?



The chart to the left shows the percentage of respondents who selected each response for each accommodation type.

Overall there is a lower rate of agreement to the proposal, in particular those resident in hostels / B&B / short term accommodation where just under 40% agreed with the remainder disagreeing or not expressing an opinion.

Resident or organisation

Comment

Resident

".. Why should someone with a bigger family get priority? Some people don't have a bigger family as they know it's not sensible/financially possible. To me this rule doesn't encourage the right mentality."

Resident

"...It will depend on the personal circumstances of each household. ie somebody becoming ill or disabled so needing own room. Age of those sharing bedrooms. May need on site carers during the night. Can not apply a blanket policy as it has to be looked at relevant to each household."

Organisation

"..This needs to be on a needs basis and decision makers need to look at the reasons why and the presenting needs of the applicants as part of this action - you can not simply make this decision linked to numbers of bedrooms and assume that if someone needs more rooms then there need is naturally more urgent."

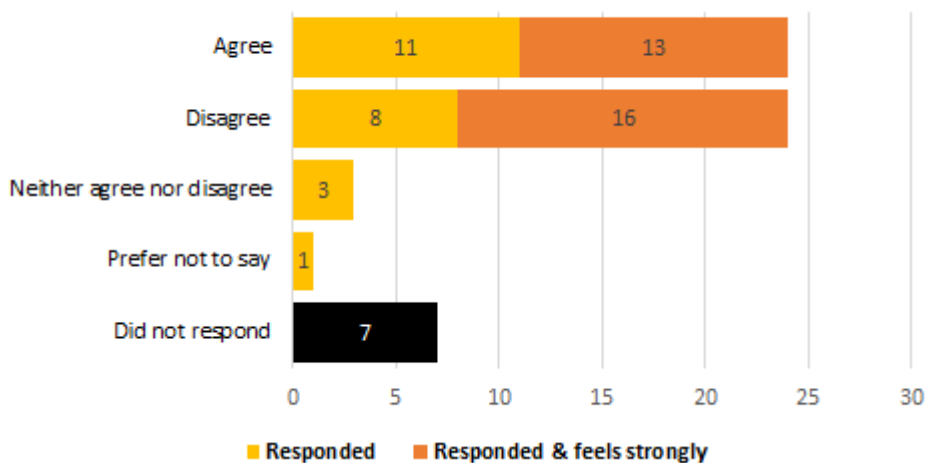
5.2. Working Households and Community Contribution

Housing allocations policy consultation responses

Currently, all applicants in housing need are placed in band three. If you work or make a contribution to the community (e.g. through doing voluntary work) then you are awarded additional priority and moved into band two. This policy has worked well over the years. However, people who are in housing crisis are often unable to work and obtain this additional priority. As fewer homes are becoming available it means that some applicants who are in housing need now have little chance of being rehoused because they cannot get into band two. We propose to remove this additional priority award (band two) for people who are working or contributing to the community. This will help us allocate homes to those who need them the most.

Do you agree that we should remove this additional priority and allocate all homes purely on housing need?

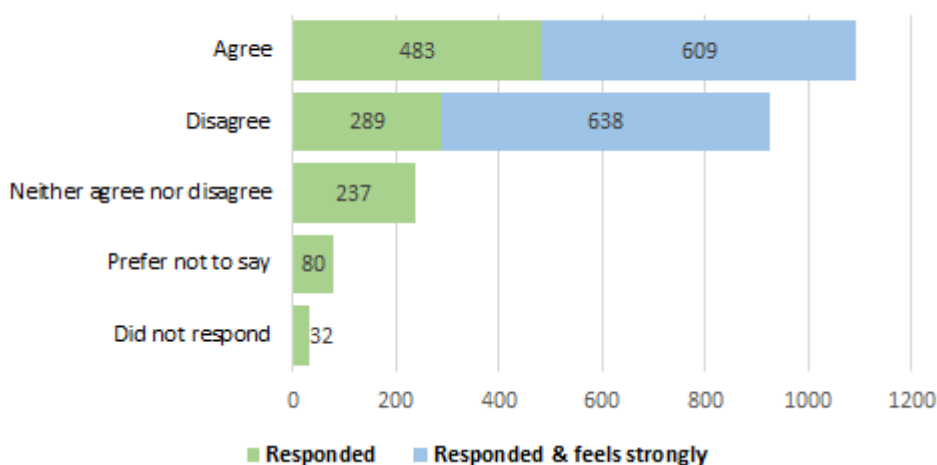
Response from organisations



Overall 2388 participants responded to this question.

39 did not provide a response

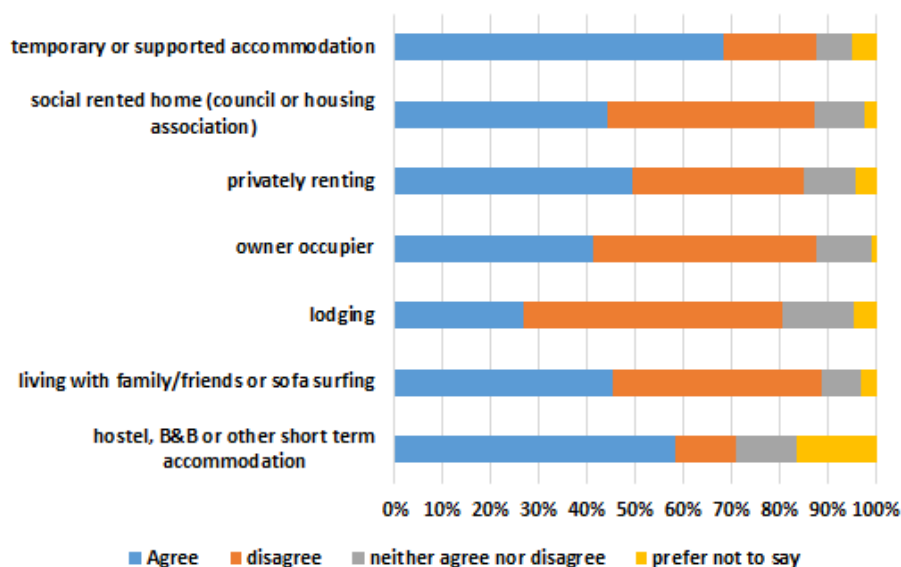
Response from residents



Of these 7 were organisations and 32 residents.

Housing allocations policy consultation responses

Does housing type impact on responses?



The chart to the left shows the percentage of respondents who selected each response respondents for each accommodation type.

As with the previous question, there is a lower rate of agreement to the proposal, in particular those categorised as lodging where just under 30% agreed with the remainder disagreeing or not expressing an opinion.

Resident or organisation

Comment

Resident

"..people who contribute via either volunteering or working should be rewarded. There should be other ways introduced for people who cannot work to get into band two say for medical reasons."

Resident

"...I'm a working lone parent and I've never been placed in band 2 or 3 but band 4. The private rental sector is charging extortionate monthly rental charges. A three bed house in openshaw stands at £700 PM. This isn't affordable and there is a risk of homelessness if you're unable to maintain payments of these rent charges. You have a duty to prevent homelessness and surely longer term that makes sense?!."

Resident

"..It is very important to keep this as it is to prevent people from moving out of the area and contributing to the area either by working there or voluntary. There are a huge number of organisations and Charities who rely on people who work or volunteer in the city who can only afford council housing. Why further punish people who are contributing - many of these people assist the over stretched charity organisations for example and this would be detrimental to the city. This change in particular is VERY ILL JUDGED."

Appendix 1

List of participating organisations.

Housing allocations policy consultation responses

Arawak Walton Housing Association
Be Well
Brentwood Lettings Ltd
Centrepont
Manchester City Council
Cornerstone Day Centre
Equity Housing
Great places housing group
Housing solutions service
Humankind
The Unite Convenor at Hendham Vale covering the Northwards Contract
Longsight health visitors
LTE Group
Manchester Mind MVAP
Manchester move
Manchester Settlement
Mosscafe St Vincent's Housing Group
Northwards
One Manchester
Police
PRS Landlord
Rethink Mental illness
Sanctuary Support Living
Sheffield
Southway
The Boaz Trust
The Guinness Partnership
The Men's Room
The Works
Victoria house sit up
Wythenshawe community Housing Group
Yos

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Appendix 3

HOUSING ALLOCATION POLICY RECCOMENDATION IMPACT AND RECCOMENDATION SUMMARY

Policy Amendment		Current Policy	Policy Change	Potential Impact	Online Survey (2427 Responses)	Policy Position
Category	Subject	Summary	Summary		Wider Public (Principle changes surveyed)	
Qualification	2 Year Residency	Currently only need a Manchester Address to apply to be on the rehousing register	Introduce a 2 year residency rule,	High Impact, approx. 1,300 applications may not have qualified due to not having a 2 year residency. Therefore making a change of this nature, if applied to the whole register, appears to have potential to reduce the competition for priority applicants.	75% Agree 14% Disagree	Fully Recommended
	Savings and Capital	Current Capital limit 75K	Reduce savings limit from £75K to £30K	Limited impact, small numbers on the register with savings over 30k , brings in line with other LA policy	76% Agree 11% Disagree	Fully Recommended
	Owner Occupation	Home Owners are eligible to join the register	Homeowners will no longer be able to join the register –	Will have a limited impact, small numbers on the register re homeowners, but will focus housing options advice. Brings in line with other LA policy	76% Agree 10% Disagree	Fully Recommended
	Exceptions & exemptions	Applicants who will be allowed on the list regardless of qualification criteria i.e Part VII applicants, armed forces, DV&A, med etc..	No Change , Same exceptions will apply as current policy	N/A	Statutory consultation.	N/A
Banding	Removal of Working Household / Community Contribution awards	Currently people who work or contribute to the community are awarded additional priority (band 2)	Revise banding so that additional priority is not awarded for working household and community contribution (band 2). People in reasonable preference will be placed in band dependant on need. (this will mean some households who hold additional preference will still retain band 2)	High impact for those household in crisis, homeless, and in unsecure temporary accommodation. Barrier to attain band 2 removed as these applicants will be categorised as band 2.	47% Agree 37% Disagree	Fully Recommended

Need Groups	Overcrowding	Applicants who are overcrowded are split into 2 bands. Those that are 3 beds short are in band 1 and those that are 1 or 2 bedrooms short are in band 2 or 3.	<p>This proposed change differentiates between different degrees of overcrowding:</p> <ul style="list-style-type: none"> Overcrowded by 3 or more bedrooms remain in band 1 Overcrowded by 2 bedrooms in band 2 Overcrowded by 1 bedroom placed in new band 3 Households with children overcrowded by 1 bedroom and living in 1 bedroom accommodation awarded band 2 	<p>One of the most significant ways of helping those in greatest need. By lowering the priority of applicants overcrowded by only 1 bedroom it will create many more opportunities to rehouse other applicants who we could perceive are in greater need.</p> <p>Overcrowding is the biggest single reason for being in bands 1-3.</p>	56% Agree 26% Disagree	Fully Recommended
	Lodgers	Lodgers not explicitly categorised in current policy.	<p>Lodgers who are applying to join the register as a separate household will be categorised as:</p> <ul style="list-style-type: none"> If lodging in another family's household and overcrowded by 1 bedroom band 2 will be awarded. 	Will reduce the numbers that present as homeless although this is difficult to gauge at this stage. More people likely to remain as lodgers than present as homeless.	Statutory consultation	Fully Recommended
	Under occupation	band 1 if releasing a family home and moving to a non-family home	<p>Move ALL under occupiers into band 1 (rejected)</p> <p>Current policy - Tenants under-occupying a family home of 3 or more bedrooms and are seeking to move to non-family type accommodation with fewer bedrooms and who will not be under occupying by more than one bedroom.</p>	Could potentially have unintended consequences- if policy extended to 2 beds. potential to create some 2 beds lower in demand in some areas i.e. 2 beds in towers/flats	Statutory consultation	Retain current policy.
	Domestic Violence & Abuse	DV&A cases currently in band 1-2-3	DV&A cases will now be band 1-2 only not band 1-2-3 due to banding structure changes and the removal of WH/CC.	Some cases who were in band 3 previously will now be positioned in band 2	Statutory consultation	Fully Recommended
	Homelessness	All cases are currently in band 3 unless working or contributing to the community then band 2	Relief duty (189B) (TA) Homelessness duty (193) applicants will now be in band 2. Due to banding structure changes and the removal of WH/CC.	Potentially the biggest impact, more homeless and households in TA will be given band 2 so through put in TA should be greater.	Statutory consultation	Fully Recommended

	Child at Height	The current scheme was amended to give flexibility to RPs to decide if a low-rise home is suitable for children 10 or over, while recognising that such families would still have priority until the scheme review formally converted the current flexibility into scheme policy.	The proposal is simply formalise and make that anticipated change	Offer additional flexibility and access to more housing for people with children	Statutory consultation	<i>Fully Recommended</i>
Additional Policy Changes	Moving Group	Currently there are no rules around who can be on a household's application to move, this means we currently have applications that require large accommodation that simply put does not exist or is in short supply.	Introduce new rules around moving group categories	Reduces expectation and the number of households on the register who require accommodation that the social sector does not have an abundance or turnover of.	Policy born out of the statutory consultation - RP's fully agreed to new rules.	<i>Fully Recommended</i>

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Appendix 4: Demonstrating Outcomes of Equality Analysis

EQUALITY IMPACT ASSESSMENT

1. Directorate	Strategic Development	2. Section	Strategic Housing	3. Name of the function being assessed	Social Housing Allocations Scheme
4. Is this a new or existing function?	Existing	5. Officer responsible for the assessment	Mark Ellison	6. Lead manager responsible for the assessment	James Greenhedge
7. Date assessment commenced	07/05/19	8. Date of completion	14/08/19	9. Date passed to Equalities Team	15/08/19

Summary of Relevance Assessment

1. Has a Stage 1 Equality Analysis: Relevance Assessment document been completed?

Yes ☒ Date of assessment: 07/05/19

No ☐ Please refer to 2.2 in the guidance above.

2. Please indicate which **protected characteristics** the relevance assessment identified as relevant to the function that is being assessed (tick below):

Age ☒ Disability ☒ Race ☒ Gender (inc. Gender Reassignment, Pregnancy and Maternity) ☐

Sexual Orientation ☐ Religion or Belief (or lack of religion or belief) ☐ Marriage or Civil Partnership ☐

3. Please indicate which **aims of the equality duty** the relevance assessment identified as relevant to the function being assessed (tick below):

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act ☒

Advance equality of opportunity between those who share a protected characteristic and those who do not ☒

Foster good relations between people who share a protected characteristic and those who do not ☐

Equality Impact Assessment Template

1. About your function

Briefly describe the key delivery objectives of the function being assessed	<p>The Manchester Social Housing Allocations Scheme (the scheme) is the statutory scheme required under Part 6 of the Housing Act 1996 (as amended). It lays down and describes the council's rules for determining the relative priority of applicants for allocations of social homes in Manchester. The current scheme has been in operation since February 2011 with only minor amendments since then. Since 2011 the demand for social homes has risen while the supply of social homes has reduced. The council determined to review the scheme in order to improve access for those in greatest need, for instance, people who have a disability or are elderly and need adapted properties are categorised as being in reasonable preference and are awarded higher priority. In recognition that the supply and demand situation means that the majority of applicants will find it hard to be rehoused into a social home in a reasonable period.</p>
What are the desired outcomes from this function?	<p>The main delivery objectives of the scheme are to ensure that social housing is allocated to those in greatest need while also helping to deliver the council's wider objectives of assisting people to access good quality affordable housing across the city.</p>

2. About your customer

Do you currently monitor the function by the following protected characteristics?	Protected Characteristics	Y/N	If no, please explain why this is the case and / or note how you will prioritise gathering this equality data
	Race	Y	

	Gender (inc. gender reassignment, pregnancy and maternity)	Y	
	Disability	Y	
	Sexuality	Y	
	Age	Y	
	Religion or belief (or lack of religion or belief)	Y	
	Marriage or civil partnership	N	Historically not collected. Collecting this information has been included in the 2019 IT update project for Manchester Move.
<p>4. What information has been analysed to inform the content of this EIA?</p> <p>Please include details of any data compiled by the service, any research that has been undertaken, any engagement that was carried out etc.</p>	<p>The current scheme uses equalities monitoring information as supplied by applicants at the time of making an application for rehousing. This information is reported annually to the Housing Access Board for the board to determine if there are any issues or actions arising. To date there have been none.</p> <p>One of the key attributes of the scheme is that it is based on assessment of housing need (defined principally by reference to the number of bedrooms needed), and it is unaware of applicants' protected characteristics except where characteristics such as age or disability give rise to a need for certain types of housing, for example, sheltered or accessible accommodation. Age and disability can have implications for the types of housing that are suitable where applicants have specific needs, and both of these are treated explicitly within the wider scheme.</p>		

	<p>The race characteristic includes travellers and a recent court of appeal judgement has highlighted the need for careful consideration of any proposed changes to the scheme as they might be found to advantage or disadvantage applications from travellers. (Reference Ward & Ors, R (on the application of) v The London Borough of Hillingdon & Ors [2019] EWCA Civ 692.) The current allocations scheme treats applications from travellers in the same way as applications from all other applicants.</p> <p>The proposed new scheme follows government guidance in looking to introduce a two-year continuous residency qualification. Such a residency qualification was the matter of the appeal court judgment noted above. The court of appeal acknowledged the legitimacy of the government's preferred two-year minimum qualifying period while finding that a ten-year residency qualification was disproportionately disadvantageous for travellers.</p> <p>The data from equalities monitoring responses show no significant percentage change outcomes for protected characteristics groups as a consequence of the proposed scheme changes.</p>
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3. Delivery of a customer focused function

Does your analysis indicate a disproportionate impact relating to race ?	Y	N	
		X	
<p>Please describe the nature of any disproportionate impact/s</p> <p>Please indicate what actions will be taken to address these</p>	<p>The scheme will introduce a two-year residency qualification for all applicants. The court of appeal judgement referred to above in part 2.4 recognises that such qualification periods, while lawful, must be proportionate.</p> <p>Manchester intends to introduce the Government's preferred two-year minimum qualification period. In looking at the equalities impact we have noted the availability of a serviced site exclusively for travellers that allows such an applicant to acquire the residency qualification. We have also noted that the current users of the site have been living there for many years and have not chosen to take advantage of the fact that the current allocations scheme would give them the highest priority for rehousing if they wished to move into permanent social housing in Manchester.</p>		
Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to disability ?	Y	N	
		X	

<p>Please describe the nature of any disproportionate impact/s</p> <p>Please indicate what actions will be taken to address these</p>	<p>The proposed allocations scheme will retain the use of assessments that ensure applicants with such specific needs are awarded appropriate (high) priority in order to have their needs met in the shortest possible time scale. In addition, the management of housing stock ensures that, for example, homes with adaptations in place are not available to all applicants, instead they are reserved for bids from applicants who need the adaptations. People who are assessed as needing particular types of properties for reasons of mental health are prioritised accordingly and are prevented from being allocated properties that do not meet their needs and would run the risk of worsening their health.</p>						
<p>Which action plans have these actions been transferred to?</p>							
<p>Does your analysis indicate a disproportionate impact relating to Gender (including gender reassignment or pregnancy and maternity)?</p>	<table border="1"> <tr> <th>Y</th> <th>N</th> </tr> <tr> <td></td> <td>X</td> </tr> </table>	Y	N		X		
Y	N						
	X						
<p>Please describe the nature of any disproportionate impact/s</p> <p>Please indicate what actions will be taken to address these</p>	<p>Pregnancy is recognised in the scheme, and assessment of housing need takes into account the unborn child/ren of a pregnant applicant at a point when the pregnancy is likely to go to full term but not before because that would mean pregnant applicants might gain an unfair advantage over other applicants. This balance is achieved by assessing applicants bedroom need at the point they are 26 weeks pregnant, and, if they will need an additional bedroom, allowing them to bid for the relevant size of home from that point on. All other aspects of this</p>						

	characteristic have no implications for assessment of housing need and the scheme is unaware of them.		
Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to age ?	Y	N	
		X	
Please describe the nature of any disproportionate impact/s Please indicate what actions will be taken to address these	Some homes, by their nature, are unsuitable for applicants who have age-related needs, for example, accessibility. This disadvantage is mitigated for applicants who, at point of application, specify that they either need or want age-specific accommodation, such as retirement, sheltered or extra care homes, by such homes being allocated separately and not being made available to other applicants. The Housing Options for Older People (HOOP) service exists to ensure elderly people are prioritised and supported to move to a smaller property if they wish.		
Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to sexual orientation ?	Y	N	
		X	

<p>Please describe the nature of any disproportionate impact/s</p> <p>Please indicate what actions will be taken to address these</p>	<p>The scheme is designed to be unaware of this characteristic, which has no implications for assessing housing need in the terms of the bedroom standard. Data tell us the the allocations scheme and the proposed changes do not impact on this characteristic.</p> <p>The council has commissioned work from the LGBT Foundation in recent years that suggests 1) there are independent housing issues for LGBT people, 2) there's a lack of LGBT-friendly social housing provision, 3) LGBT people in shared accommodation (i.e. extra care) either can't come out or actually some people have gone 'back in the closet' because they face prejudice, 4) LGBT people but particularly trans people report they have faced significant prejudice in housing provision.</p> <p>These societal prejudices are important. Although a housing allocations scheme can't change prejudice, these issues have been responded to outside the scheme. Hence the LGBT majority extra care scheme that's being developed. Allocations for this provision are outside of this scheme.</p>						
<p>Which action plans have these actions been transferred to?</p>							
<p>Does your analysis indicate a disproportionate impact relating to religion and belief (including lack of religion or belief)?</p>	<table border="1"> <tr> <td>Y</td> <td>N</td> </tr> <tr> <td></td> <td>X</td> </tr> </table>	Y	N		X		
Y	N						
	X						

<p>Please describe the nature of any disproportionate impact/s</p> <p>Please indicate what actions will be taken to address these</p>	<p>The scheme is designed to be unaware of this characteristic, which has no implications for assessing housing need according to the bedroom standard. The Manchester Move system is a choice-based lettings system and all applicants are free to bid for homes for which they are eligible according to the bedroom standard and which they feel meet their needs.</p>		
<p>Which action plans have these actions been transferred to?</p>			
<p>Does your analysis indicate the potential to <i>cause discrimination</i> in relation to marriage and civil partnership?</p>	<p>Y</p>	<p>N</p> <p>X</p>	
<p>Please describe the nature of any disproportionate impact/s</p> <p>Please indicate what actions will be taken to address these</p>	<p>The scheme is designed to be unaware of this characteristic, which has no implications for assessing housing need.</p> <p>Beyond the fact of applicants having this characteristic, the societal assumption that marriage generally leads to starting a family and people shouldn't be discriminated against on that basis is taken into account in the current and the proposed schemes by changing circumstances being taken into account. For example, a couple would be entitled to a 1 bedroom home under the bedroom standard. If they start a family, their circumstances change and their bedroom need would increase, with the scheme taking that into account.</p>		

Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to carers ?	Y	N	
		X	
<p>Please describe the nature of any disproportionate impact/s</p> <p>Please indicate what actions will be taken to address these</p>	<p>Carers are already accounted for in the current allocations scheme, and there is no suggestion of that changing. In brief, carers are allocated a bedroom subject to them needing one.</p> <p>Given that there is no change the proposed changes will not have a disproportionate effect on carers.</p>		
Which action plans have these actions been transferred to?			

4. EIA Action Plan

Service / Directorate lead:
 Strategic Director:
 Equality Team lead:

Actions identified from EIA	Target completion date	Responsible Officer	Is this action identified in your Directorate Business Plan and / or Equality Action Plan? (Yes / No / n/a)	Comments
No actions identified				

5. Director level sign off

Name:	Martin Oldfield	Date:	7 October 2019
Directorate:	Strategic Development	Signature:	See Signed PDF.

NB: Sign-off must be in the form of an actual signature; not an emailed authorisation.

Appendix 2

Each Directorate has a nominated officer from within the HROD Service’s Equality Team to provide consultation, advice, guidance and support.

The nominated officers for each Directorate are:

Directorate	Nominated Equality Team Lead
Corporate Core	Keiran Barnes – 234 3036 (33036) keiran.barnes@manchester.gov.uk
Neighbourhoods and Strategic Development	Ryan Lamey-McArthur– 234 1822 (31822) r.lamey-mcarthur@manchester.gov.uk
Children’s Services	Lorna Young – 234 8596 (38596) l.young2@manchester.gov.uk
Adults Services	Sofia Higgins – 234 8458 (38458) Sofia.higgins@manchester.gov.uk

Useful Background information

Equality Act 2010:
<http://www.equalityhumanrights.com/advice-and-guidance/new-equality-act-guidance/equality-act-guidance-downloads/>

Equality and Human Rights Commission – Guidance to the Public Sector Equality Duty (includes an essential guidance document and detailed guidance on equality analysis, engagement, equality objectives and equality information):

<http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

State of the City reports, State of the Ward reports and Communities of Interest reports:

http://www.manchesterpartnership.org.uk/manchesterpartnership/downloads/file/190/state_of_the_city_report_2012_complete_report

Manchester City Council Report for Information

Report to: Neighbourhoods and the Environment Scrutiny Committee – 6 November 2019

Subject: Update on Homelessness and Housing

Report of: The Director of Homelessness

Summary

This report provides an update, subsequent to the report to Neighbourhoods and Scrutiny on the 17th July 2019, on the work that is taking place to tackle homelessness and rough sleeping in the city. The focus of the report reflects the concerns and questions raised by Members at previous meetings of the committee.

Recommendations

Members are invited to consider and comment on the information contained within this report.

Wards Affected: All

Alignment to the Our Manchester Strategy Outcomes (if applicable):

Manchester Strategy outcomes	Summary of how this report aligns to the OMS
A thriving and sustainable city: supporting a diverse and distinctive economy that creates jobs and opportunities	Helping people to stay in their accommodation through prevention work will help them to thrive. Reducing the number of people who are homeless, or placing them in appropriate accommodation with help to access employment and learning opportunities will contribute to Manchester become a thriving and sustainable city.
A highly skilled city: world class and home grown talent sustaining the city's economic success	Having public, private and voluntary sector organisations working together to help people who have personal insight into homelessness into volunteering and employment will contribute to the objective of having a highly skilled city. Employment breaks the cycle of generational benefit dependency and will encourage children to access school and employment in later life.

A progressive and equitable city: making a positive contribution by unlocking the potential of our communities	Supporting people who are homeless to access employment and accommodation will unlock their potential to help them become independent citizens who contribute to our city. Working with the Homelessness Partnership to ensure that the views of people with personal insight into homelessness influence ways of working.
A liveable and low carbon city: a destination of choice to live, visit, work	Encouraging commissioned and inhouse services to reduce CO2 emissions and reduce their use of plastics will contribute to a low carbon city. Introducing climate change conversations with homeless people will support them in adopting a low carbon lifestyle.
A connected city: world class infrastructure and connectivity to drive growth	n/a

Contact Officers:

Name: Mike Wright
 Position: Director of Homelessness
 Telephone: 0161 234
 E-mail: michael.wright@manchester.gov.uk

Name: Nicola Rea
 Position: Strategic Lead for Homelessness
 Telephone: 0161 234 1888
 E-mail: nicola.rea@manchester.gov.uk

Background documents (available for public inspection):

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy please contact one of the contact officers above.

Neighbourhoods and the Environment Scrutiny Committee – Wednesday 5th September 2018 - Update on the work to tackle homelessness and rough sleeping

Health Scrutiny Committee – 4th December 2018 - Homelessness Business Planning: 2019/20

Neighbourhoods and the Environment Scrutiny Committee - Wednesday 6th February 2019 - Homelessness Business Plan 2019 - 2020

Executive Meeting - Wednesday 30th May 2018 - Executive Priorities 2018/19

Neighbourhoods and the Environment Scrutiny Committee – Wednesday 6th March 2019 - Update on Homelessness and Housing

Neighbourhoods and the Environment Scrutiny Committee – Wednesday 19th June -
Update on the work of the Section 21 team based within the Housing Solutions Team

1.0 Introduction

- 1.1 Homelessness is not just about people who sleep rough on our streets, but also consists of the much larger number of single people in hostel accommodation, families in dispersed temporary accommodation, as well as those who are hidden homeless, those who 'sofa surf' and stay with friends on a temporary basis.
- 1.2 Across Manchester an increasing number of individuals and families are becoming homeless and are at greater risk of homelessness by this wider definition. The main reason for statutory homelessness is the loss of a tenancy in the private rented sector which has become the number one cause above domestic abuse. Government welfare changes, which include capping personal benefits and limiting the amount payable in rent via the Local Housing Allowance, have had a major impact in contributing to the loss of tenancies.
- 1.3 This report is an update from the report that went to the Neighbourhoods and Environment Scrutiny on the 17th July 2019. The Committee outlined a number of areas where they wanted further information, which have been expressly considered in this report.
- 1.4 The area of homelessness remains highly challenging. The Council's services continue to see significant levels of demand and footfall, at a time of a growing imbalance between demand and affordable supply. This hugely increases the challenges of ensuring that the Council meets its statutory duties in a manner which provides the best outcomes for homeless households.

2.0 Update to the Committee

- 2.1 The Homeless Department works with both single people and families. Wherever possible, interventions begin prior to someone becoming homeless and we commission advice services which help people to stay in their own accommodation and prevent homelessness.
- 2.2 The statutory framework for tackling homelessness is mainly the 2017 Homelessness Reduction Act, which was enacted on 01 April 2018. This changed the focus of homelessness interventions and the statutory homelessness process itself by introducing two new stages - prevention and relief - under a new statutory duty to prevent homelessness.
- 2.3 The key impact of the Act was to bring more single homeless people within the scope of statutory assistance and this has been the case in Manchester, leading to an increase in requests for assistance and in the use of temporary accommodation.
- 2.4 The profile of requests for assistance since the last report to the Committee is outlined in Table 1, below:

Table 1 - Requests for Assistance July - October 2019

	Families	Singles	Total	From MCC	From GM	Outside GM	Other**
July	280	625	905	582	63	38	222
August	222	604	826	498	64	52	212
September	276	566	842	493	99	65	185
October*	282	512	794	487	52	59	196
	1060	2307	3367	2060	278	214	815
	31%	69%	100%	61%	8%	6%	25%

*correct to 25/10/2019

** consists of No Fixed Abode, HMP discharge and last address not known

- 2.5 Table 1 shows that the 3367 separate requests for assistance were made between July-October 2019. This is a historically high figure. Requests for assistance and homelessness presentations are continuing to rise, with the figure for the first quarter of 2019/20 recorded as 80% higher than the same period in 2016/17 (2388 compared to 1329).
- 2.6 It should be noted that the figure of 25% recorded in the 'other' category includes presentations from people with no fixed abode or whose last 'address' was in prison. Many of these will actually be from Manchester and/or have a connection to the city.
- 2.7 Presenting to the Council for assistance requires that the Council fulfil a range of legal duties, prescribed in legislation. One of these may be the provision of temporary accommodation. At the last Scrutiny meeting in July 2019, members requested information on the location of facilities for the accommodation of homeless households. Temporary accommodation is provided through a number of facilities, provided by the Council and partners. The main schemes are outlined below:

Scheme	Provider	Beds/Units	Type of Provision
Dispersed Units	Various private landlords under contract	1500 properties	Individual privately-rented properties in the community, across GM. Floating support.
Bed & Breakfast	Various private owners under a framework	As required, c.200 at any time	B&B units across GM. Floating support.
Longford Centre	MCC	38	Self-contained rooms,

			low support needs, on-site staff
Oak Lodge	MCC	8	Self-contained flats for families, on-site staff
Willowbank	MCC	13	Self-contained flats for families, on-site staff
Women's Direct Access Centre	MCC	33	Individual rooms with shared kitchen and bathroom facilities, on-site staff.
Woodward Court	MCC	60	Self-contained flats, on-site staff.

- 2.8 It should be noted that this portfolio is supplemented by use of schemes on an ad hoc basis as required, for example including women's refuges and units of supported housing.
- 2.9 Accommodation is provided for the extent of the legal duty owed to any household. This may be until a household is rehoused, which may be a period of years, dependent upon individual circumstances. There is a strict legal limit of 6 weeks for the length of stay in bed-and-breakfast accommodation for families. Through the increased level of prevention work, we have been able to reduce overall numbers in bed-and-breakfast and also the length of time that people spend in this form of accommodation.
- 2.10 Support is offered to all households who enter into temporary accommodation, regardless of the nature of the accommodation that they occupy. For site-based schemes, residents will have a key worker to work with them during their stay. This will include income maximisation and also resettlement and rehousing work.
- 2.11 For residents of dispersed accommodation and bed-and-breakfast hotels, support is offered on a floating basis. The Directorate has locality-based floating support teams who work on a caseload basis, including working with households to enable rehousing and move-on.
- 2.12 All temporary accommodation properties are inspected prior to being taken onto the scheme and this includes bed-and-breakfast accommodation. Since July 2019, the Directorate has established a specialist team of inspectors to undertake this work together with instigating a routine of regular inspections. Since July, the team have carried out over 400 property inspections, as outlined below:

		J U L Y	A U G	S E P T
DISPERSED TA				
TOTAL VISITS COMPLETED BY INSPECTORS		1 2 2	1 4 7	3 3 4
TOTAL PROPERTIES INSPECTED		8 3	1 3 8	2 2 7

3.0 Update on the A Bed Every Night Scheme (ABEN)

- 3.1 The A Bed Every Night programme is a GM-wide programme to provide beds and support to people who sleep rough in the city-region. The scheme is funded through GMCA and each local authority arranges its own response, utilising local intelligence and capacity, with the resources provided by GMCA, based on a common framework. This year, the scheme is to run to 30 June 2020 before being reviewed.
- 3.2 Last winter, Manchester had 529 unique individuals referred to it through ABEN, and accommodated 377 unique individuals.
- 3.3 Provision in the city is managed through a range of providers who each provide bespoke responses to assist people who sleep rough. This year, we have enhanced our provision to include more or better of the following:
- Separate provision for women who are sleeping rough.
 - Priority given to outreach teams for beds in two of the services to ensure the most complex and entrenched people can access accommodation.
 - An out of hours offer.
 - Greater flexibility in provision to ensure that single rooms can be offered to those who are unable to share.
 - Priority access for people in ABEN into Housing Related Support services through the new Manchester Access and Support gateway.
 - Closer links are in the process of being developed with the Housing Solutions Team to ensure that people who sleep rough receive a homeless assessment.
 - Better links with health services particularly substance misuse and mental health services, with a focus on monitoring health outcomes.
 - A greater focus on reconnection where people come into the city from other areas of the UK.
- 3.4 As of 31 October, provision in the city for ABEN was as follows:

Provider and Service	Support Needs	Beds Per Night	Timetable
ABEN Cornerstone pods	Low - Medium	16	Operating now - 1st July 2020
ABEN Sanctuary - Stanley Grove	Medium - High	20	Operating now - 1st July 2020
ABEN SPIN - The Well	Low - Medium	14	Operating now - 1st July 2020
ABEN – (NRPF, Refugee)	Low - Medium	10	Opening Monday 28 th October.
ABEN MCC Rochdale Road	Medium - High	24	Operating now - 1st July 2020
ABEN Boaz	Low	15	Operating now – May 30 th 2020
ABEN Sanctuary - Spencer Court	Low - Medium	9	Operating now - 1st July 2020 7 of 9 spaces now available. Sanctuary working at re housing last 2 residents with support from Northward Homes
ABEN Greater Together Manchester - St Cuthbert's Phase 2	Low - Medium	27	Opening 31 st October
Totals as of (31st October 2019)			<u>135</u>

- 3.5 The number of people who sleep rough who come from the armed forces is quite small in the city. While this is also the experience of other authorities in Greater Manchester, it is also understood that this group may be less willing to access services and therefore be under-represented.
- 3.6 The data monitoring which accompanies access to the ABEN programme will identify where people are from the armed forces. This is through self-identification by the person themselves. In these cases, people are referred, with their consent, to appropriate support services. This may be those provided for the armed-forces exclusively, for example the British Legion, breakfast clubs and Broughton House. However, it may also be that specific issues such as PTSD and its mental health impacts are managed through referrals into mainstream services. These are done as people are managed into accommodation. The advantage of the extended ABEN scheme is the additional time which it allows to work with people with often very complex needs.

- 3.7 Statistical returns are provided to GMCA for monitoring and this includes where people have been identified as being from the armed forces.

4.0 Conclusion and Recommendations

- 4.1 Scrutiny Committee are asked to note the contents of the report.

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