

**Decision Maker:** RENEWAL, RECREATION AND HOUSING PDS COMMITTEE

**Date:** Thursday 15<sup>th</sup> June 2023

**Decision Type:** Non-Urgent Non-Executive Non-Key

**Title:** HOUSING ALLOCATIONS REVIEW BRIEFING PAPER

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**Ward:** All

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1. Reason for report

- 1.1 The current Allocation Scheme was first published in 2012, amended in 2015 and the last formal update made in 2017 following the introduction of the Homelessness Reduction Act (2017). In order to ensure that the Scheme is contemporary and meets all current legislative requirements a review of the Council's Allocations Scheme was approved in November 2022.
  - 1.2 In order to let accommodation, the Council Bromley currently operates a choice-based lettings system with some direct lets. A review of this system is also being undertaken in conjunction to the Allocation Scheme review.
  - 1.3 This report provides an update on progress made, proposed delivery model and indicative project delivery timescales.
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2. **RECOMMENDATION(S)**

- 2.1 That Members of the Renewal, Recreation and Housing PDS Committee note the content contained within the report.

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### Impact on Vulnerable Adults and Children

1. Summary of Impact: The Allocation Scheme ensures that the Council is able to meet its statutory responsibilities in respect of housing. That priority for housing is fairly and consistently prioritised in accordance with all legal and statutory responsibilities.
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### Transformation Policy

1. Policy Status: Existing Policy
  2. Making Bromley Even Better Priority (delete as appropriate):  
To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.
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### Financial

1. Cost of proposal: Not Applicable:
  2. Ongoing costs: Not Applicable:
  3. Budget head/performance centre: Operational Housing
  4. Total current budget for this head: £7,262k
  5. Source of funding: 2023/24 revenue budget
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### Personnel

1. Number of staff (current and additional): N/A
  2. If from existing staff resources, number of staff hours: N/A
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### Legal

1. Legal Requirement: None, information item.
  2. Call-in: Not Applicable: Information Briefing
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### Procurement

1. Summary of Procurement Implications: None, information item.
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### Property

1. Summary of Property Implications: None, information item.
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### Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: None, information item.
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### Customer Impact

1. Estimated number of users or customers (current and projected): More than 5,000 households' approach with housing difficulties which could lead to homelessness each year. At present there are just under 3000 households included on the Housing Register. There are currently approximately 1500 households in Temporary Accommodation these are predominantly located outside the borough. This includes c.1,100 households in costly nightly paid Temporary Accommodation. It costs the Council an average of £7,110 per household in Nightly Paid accommodation, this in turn puts a strain on LBB's budgets which impacts on other services.
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### Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: This is an information only update however all Councillors will be able to participate in the formal consultation once it goes live.

### 3. COMMENTARY

3.1 The Council has engaged Campbell Tickell in order to provide consultancy services and make recommendations.

To date the work completed so far includes:

An inception meeting which explored the position Bromley is in.
A gap analysis of the current allocation scheme.
Initial meetings with Legal Services, the Comms Team and Senior Managers within Housing.
A series of policy discussions with the service including discussions around inclusions, exclusions, banding and resources.
Drafting of the proposed Scheme commenced w/c 22/05/23
Delivery Timeline Finalised – provided in Appendix 1.

3.2 A lawful and contemporary Allocation Scheme and an associated method for allocation is essential in allowing the Council to not only meet its statutory responsibilities but also in allowing us to manage expectations, make best use of resources, minimise use of temporary accommodation and encourage engagement with other Housing Providers.

3.3 Campbell Tickell have carried out a gap analysis of the existing Allocation Scheme and have identified a number of areas that require updating and amending. These include:

- Legislative updates – such as the Data Protection Act 2018 and contained within the General Data Protection Regulation 2018 (GDPR) and the Domestic Abuse Act 2021.
- Requirements for tenants as the Council now once again has its own housing stock and tenants.
- Adjustments to the priority awarded to homeless households in order to support a reduction in the use of temporary accommodation.

3.4 Discussions have been held by Officers as to the merits of the existing Choice Based Lettings Scheme. In May 2023 Campbell Tickell carried out research:

- They contacted 64 local authorities across the SE England.
- 5 have yet to respond.
- 59 responded and 56 of them use choice-based lettings
- 3 do not use choice-based lettings.

3.5 Whilst officers were keen to explore a direct let only method the evidence gathered would suggest that this is very labour intensive and is not an approach favoured by the majority of Housing Providers. However a hybrid of both direct offers and choice based lettings when an applicant bids for accommodation is feasible. Direct offers require the Council to give the applicant choice based in their application; such as areas of preference and property type. Offers are based on these preferences and refusals often lead to discussions on the suitability of the offer which can be time consuming. With a staff team already stretched, this was felt possible for the top band and even the one under it, allowing officers to target moves for those in the greatest need but not for all 4 bands.

- 3.6 Whilst the Council now owns accommodation once more the numbers at this stage are very small and it will be a number of years before these increase. The number of new lets and relets expected over the next 10 years will not be considerable. The current allocation scheme does not allow applicants who are adequately housed to be included on the Housing Register, and the service does not believe this should change. However as a landlord, the Council must consider what opportunities it allows to its own tenants for social mobility.
- 3.7 As part of the Scheme review consideration will also need to be given to the Council's Housing IT systems and their ability to support any proposals. Further details will be made available to Members in due course.
- 3.8 The current staffing team is incredibly lean. The initial review of the Scheme has identified areas of potential opportunity and risk which will need to be considered in line with the resourcing available to proactively manage the function of the Scheme going forward. For example, the Housing Register team currently consists of 2 x Housing Register Officers and a Team Manager. There are 6 Allocations Officers (one of whom is on a fixed term contract which expires in late 2023) and a Team Manager. Greater resourcing within these areas would allow for a robust annual review of all those included on the Register, greater pre-allocation checks to ensure that any changes of circumstances are correctly addressed and enhanced support and assistance to ensure that offers are made and accepted.

#### **4. IMPACT ON VULNERABLE ADULTS AND CHILDREN**

- 4.1 More than 5,000 households' approach with housing difficulties which could lead to homelessness each year. There are currently approximately 1500 Bromley households in Temporary Accommodation these are predominantly located outside, the borough. This includes c.1,100 households in costly nightly paid Temporary Accommodation. It costs the Council an average of £7,110 per household in Nightly Paid accommodation, this in turn puts a strain on LBB's budgets which impacts on other services.
- 4.2 Included in the review of the Allocations Policy, officers will complete an exercise to assess the impact of any changes to our live waiting list and undertake an Equality Impact Assessment.

#### **5. TRANSFORMATION/POLICY IMPLICATIONS**

- 5.1 In accordance with the Housing Act 1996 Housing Authorities are required to have an Allocation Scheme for determining priorities and for and for defining the procedures to be followed in allocating housing accommodation; and they must allocate in accordance with that scheme. This is required regardless of whether or not they own their own housing stock or contract out the delivery of any of their allocation functions.

#### **6. FINANCIAL IMPLICATIONS**

- 6.1 No direct financial implications to this report, this report is for information and asks members to review the contents. The report sets out the progress made so far on the review of the Council's Allocations Policy.

#### **7. LEGAL IMPLICATIONS**

- 7.1 Every local housing authority in England must have a scheme (their "allocation scheme") for determining priorities, and as to the procedure to be followed, in allocating housing accommodation. The scheme must comply with requirement set out within part VI of the Housing Act 1996 and have regard to statutory guidance. When an updated scheme is produced, by the external consultants commissioned to undertake the work, it will need to be reviewed to ensure legal compliance.

<b>Non-Applicable Headings:</b>	Procurement Implications, Property Implications, Carbon Reduction/Social Value, Personnel
Background Documents: (Access via Contact Officer)	[Title of document and date]

## PROPOSED TIMELINE

Date	Meeting	Action
16th May 2023	PSG Meeting	To confirm preferred approach for way forward e.g. blended CBL approach or direct offer only. Also to identify and establish ongoing resource.
20th May	N/A	CT to provide market research supporting information to aid decision making.
2nd June	N/A	Final presentation to be circulated to members via DS
15th June	RR&H PDS	Paper to be made available to Members.
16th June	N/A	CT to provide first draft allocations policy
19th June	N/A	First draft to be issued to legal for due diligence and approval
26th June	N/A	Final draft policy received back from Legal.
28th July	N/A	Paper and draft allocations policy to be issued to Democratic Services for circulation
9th August	Executive	To seek approval to proceed with consultation
<b>**8 Weeks consultation – Commence 14th August – Closes 9th October **</b>		
<b>** 2 weeks to review findings of consultation, produce final document and covering report**</b>		
3rd November	N/A	Final documents to be sent to democratic services for circulation to members
15th November	RR&H PDS	Approve final documents
17th November	N/A	Documents to be provided to democratic services for circulation to executive
29th November	Executive	Approval of final documents
1st December	N/A	Documents to be provided to democratic services for circulation to Full Council
11th December	Full Council meeting	Final approval
1st January-31st March	N/A	IT/Recruitment/Staff training/Website/Communications
1st April 24	N/A	GO LIVE