

Proposed amendments to the Property Pool Plus housing allocation scheme: summary of responses to the public consultation

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NEIL MORLAND CO
HOUSING CONSULTANTS


Property Pool Plus



Property Pool Plus

Property Pool Plus (PPP) is a housing allocation scheme which operates across the local housing authority areas of City of Liverpool, the metropolitan boroughs of Knowsley, Sefton, and Wirral and the borough of Halton. PPP is a partnership between the aforementioned local housing authorities and numerous private registered providers of social housing. PPP provides a common procedure and approach to allocating social rented housing, using a choice-based method to let homes.

Liverpool City Region Combined Authority

The Liverpool City Region Combined Authority (LCRCA) is a local authority covering the City of Liverpool, the metropolitan boroughs of Knowsley, St Helens, Sefton and Wirral and the borough of Halton. Founded in 2014, an elected mayor leads the authority, together with the council leaders of the constituent local authorities. The LCRCA administers devolved powers from the UK Government, such as transport, economic development and regeneration functions.

Neil Morland & Co

Neil Morland & Co are housing consultants. Formed in 2011, we work throughout England, Scotland and Wales with national and local governments, housing associations, voluntary organisations and others. We believe there should be adequate housing for everyone. We improve the quality and potential of housing services and strategies.

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Introduction

This report provides a summary of feedback received from a consultation, which invited comments on proposals to amend the Property Pool Plus housing allocation scheme.

These proposals relate to the following local authority areas:

- Halton Borough Council
- Knowsley Metropolitan Borough Council
- Liverpool City Council
- Sefton Metropolitan Borough Council
- Wirral Metropolitan Borough Council

The consultation was aimed at any member of the public. Neighbouring local authorities, social housing tenants, waiting list applicants, voluntary organisations and housing associations were expected to have an interest.

The consultation was run by each local authority via its own website and also via the Property Pool Plus website.

The consultation lasted for 12 weeks from [insert start date and end date].

The consultation could be responded to by using an online survey or, written responses could be submitted by email or sent by post.

Respondents were asked to confirm whether they are replying as an individual or submitting an official response on behalf of an organisation.

The Liverpool City Region Combined Authority on behalf of the local authority members of Property Pool Plus, commissioned an independent review of the way social rented housing is allocated. Review was carried out during 2019. A range of recommendations were made, including that the rules for allocating social rented housing should be amended to ensure full compatibility with the law and alignment with recognised good practice.

Overview

A total of 4,344 individual responded to the consultation, along with 4 organisations. 36% of all respondents were from Liverpool, which is reflective of City residents equating to one-third of the population of the Liverpool City Region.

	Halt on	Knowsley	Liverpool	Sefton	Wirral	Total
Individual	433	657	1,593	718	993	4,394
on behalf of an organisation	0	1	2	1	0	4
Grand Total	433	658	1,595	719	993	4,398

The majority (both in relative and absolute terms) of respondents agreed with all four key proposals being consulted on.

The proposed qualification criterion was the most commonly agreed with and the proposals for prioritisation was the least commonly agreed with. The proposed qualification criteria and was also the most commonly disagreed with and the proposals for affording additional preference were the least commonly disagreed with. The proposed qualification criteria and had the least amount of non-responses and the proposals for prioritisation have the most amount of non-responses.

More responses were submitted about the proposed disqualification criteria than any other question, with the least amount being submitted in response to the question about prioritisation.

More comments were submitted about the proposed disqualification criterion than any other question, the least amount of comments being submitted about the proposals for awarding additional preference.

Summary of Responses

Question 1. Do you agree or disagree with the proposed qualification criteria?

An overall average of 91% of consultees responded to this question, 66% of respondents agreed with proposed qualification criteria, compared to 24% disagreeing and 16% providing no response.

	Halton	Knowsley	Liverpool	Sefton	Wirral
Agree	68%	58%	60%	74%	62%
Disagree	20%	25%	21%	26%	23%
No response	12%	17%	19%	0%	15%

There were supportive comments made about the proposed amendments regarding disqualification due to antisocial behaviour.

Comments about the proposed rent arrears criteria were most frequently made in responses. The proposed new arrangements, abolishing an arbitrary cap and replacing it with an arrangement that require at least three consecutive repayments and for these to be no more than one month behind scheme is designed to more person centred, allowing unique circumstances to be better taken account of. Given the amount of concern raised from this survey about the proposed rent arrears criterion, it will be important to communicate the more advantageous arrangements that are being proposed, before and when they are put into force.

Comments were made disagreeing about proposals for two-year minimum local connection criterion, with many preferring local connection rules being relaxed or removed entirely. It has to be acknowledged that the two-year rule will disadvantage some applicants. It will be important to communicate that the two-year threshold is a requirement set out in statutory guidance. Equally, it will be valuable to promote the fact that exemptions will be made for those persons who are entitled to reasonable preference.

Comments were made about the exemptions specific for victims of domestic abuse, with respondents being concerned that these exemptions were adverse to the interests of persons in such circumstances. It will be important to communicate clearly all of the matters specific made throughout the whole policy (not just those specific to qualification) so victims of domestic abuse and organisations that might support them, are confident that the Property Pool Plus Scheme has been formulated to positively discriminate for victims of domestic abuse, so they can be rehoused as quickly as possible. There would be some benefit in publishing a specific guide for victims of domestic abuse, explaining how any applications will be handled and that the proposed amended scheme satisfies the directions set out in MHCLG's code guidance about making allocations of social

rented housing to the victims of domestic abuse and the new housing specific duties arising from the Domestic Abuse Act 2021

Comments were made about the exemption specific to Armed Forces personnel, veterans and their families, with respondents suggesting that such exemptions were unnecessarily favourable. There will be some benefit in publishing a specific guide for Armed Forces personnel, veterans, and their families, explaining how applications will be handled and that the proposed amended scheme satisfies the directions set out in MHCLG's code of guidance about making allocations of social rented housing to Armed Forces applicants.

Comments were made disagreeing the proposal for an applicant's equity or savings to be taken account of when considering whether a person qualifies to join Property Pool Plus. Likewise, some respondents also disagreed with the proposal to disqualify a person due to being a homeowner. It will be important to communicate that by law, social rented housing has to be allocated to people whose needs cannot be met by the general housing market. It will be essential to make clear that a person with savings or assets above the upper savings threshold, as fixed by the Department of Work and Pensions, has been deemed to be a sufficient amount for to secure housing from the general market. Equally, emphasise that this applies only to savings and assets, and not to income will also be helpful and that some exemptions have been made to homeowners in certain specific circumstances.

Question 2 - Do you agree or disagree with the proposals for offering choice?

An overall average of 88% of consultees responded to this question, 62% of respondents agreed with proposed qualification criteria, compared to 22% disagreeing and 21% providing no response.

	Halton	Knowsley	Liverpool	Sefton	Wirral
Agree	64%	54%	51%	73%	60%
Disagree	18%	22%	24%	26%	20%
No response	18%	24%	25%	0%	20%

Comments were made about proposals to limited the right of refusal of reasonable offers. Many respondents suggested that there should be no limit on the number of reasonable refusals an applicant is entitled to make. Others suggested that a cap of three should be applied across the scheme bands. Consideration could be given to revising current proposals for refusal of reasonable offers, to make this an equal threshold across all bands (e.g. a cap of three) for all applicants regardless of their circumstances. One consequence of making such a change, would be a possible reduction in the number of review requests relating to refusal of reasonable offers. Another consequence might be that persons who are homeless or owed a homelessness duty, might remain occupying

temporary accommodation longer than they otherwise could have done so. This might also be the case for persons occupying a hospital bed ready for discharge, anyone living in supported housing ready to move on, people waiting to leave the care of children services, and other applicants living in transitional housing or institutional environments.

Comments were made about applicants having the right to make more than three bids per week, with many applicants suggesting there should be no limit set at all. It will be important to communicate the reasons for why such a limit has been put in force and how this benefits the overall operation of the scheme. Proposed amendment made to the scheme set out at section 2 a range of information that will be provided about any given dwelling, subject to this being made available by registered providers. The scheme also sets out at section 2, the types of formats by which information will be provided. It will be important to ensure as much information is made available as possible and that this is set out in a user-friendly fashion. This information could be provided via the scheme website but also be made available in other electronic or printed formats.

Comments were made about clarifying what constituted a reasonable offer. Whilst these facts can be found from reading the proposed scheme rules, there will be some value in putting all this information together in section 5 of the proposed amended scheme.

Comments were made about dissatisfaction with the choice-based letting model and instead adopting alternative model of choice, that might also involve replacing the banding mechanism with a points-based system. It will be important to communicate the benefits of the choice-based lettings approach such as that it fosters transparency about what properties are available to let and to which applicants they were left to. When the scheme is next reviewed, consideration could be given to appraising the options available to facilitate choice and effectiveness of these.

Question 3 – Do you agree or disagree with the proposals for affording additional preference to persons in the specified circumstances

An overall average of 83% of consultees responded to this question, 69% of respondents agreed with proposed qualification criteria, compared to 14% disagreeing and 30% providing no response.

	Halton	Knowsley	Liverpool	Sefton	Wirral
Agree	54%	56%	57%	83%	63%
Disagree	16%	10%	12%	17%	12%
No response	30%	34%	31%	0%	25%

Comments were made about providing extra support with making an application and affording more priority for applicants with a disability and/or medical needs. Legislation already guarantees people support with making an application for an allocation of social

rented housing and assistance with expressing choice and responding to offers. The specifics of how this will be carried out under the Property Pool Plus scheme are set out in section 2 of the proposed amended rules. The availability of this assistance, including how to secure it, should be enthusiastically promoted prior and at the time of the amended scheme being launched. It's important to note that Liverpool City Council shall be commissioning an independent review of its accessible housing register, findings from which can inform any future amendments to Property Pool Plus scheme in respect of administering applications from disabled applicants. Notwithstanding this, any future guidance issued by the UK government on making allocations to disabled applicants, will be fully incorporated as required, into the operation of the Property Pool Plus.

Comments were made about overcrowded households, with some suggesting that they should be given less priority and others that they should be given more. It would be useful to publish specific information for applicants from overcrowded households, setting out the range of actions the local authority might be able to assist them with, via initiatives provided from a Council's private sector housing service and how such actions complement the prioritisation for an allocation from the Property Pool Plus scheme. Such information could also include how overcrowding can have an adverse effect on a household's well-being and how individual households might be able to prevent and tackle overcrowding themselves.

A common comment made by respondents who disagreed with the proposals for affording additional preference, was more priority should be given to people in employment. It will be important to emphasise the provisions within the proposed property pool plus scheme that afford that recognise community contribution for applicants in employment and or education. It would also be useful to promote the fact that applicants who need to move will be suitably prioritised and might benefit from being exempt from the usual local connection criteria. There may be some value in considering whether greater regard is had to the principle of community contribution when prioritising applicants for an allocation. It's important to note that there were also comments that expressed an opposition to employment being a factor connected with prioritising how social housing allocations are made.

Comments are made that priority should be given on individual circumstances. It's important to communicate clearly to current and future potential applicants, that each person's unique situation is fully taken account of when they apply to join property pool plus and that that specific housing needs of any given household directly informs the degree of priority they are afforded.

Comments were made that more priority should be given to persons who are homeless or owed a homelessness duty. It will be beneficial to publish some specific advice for persons who are homeless or owed a homelessness duty, setting out how their application will be handled and the priority that they will be afforded. Such advice should explain clearly that any person who is homeless owed the relief duty or is homeless and owed the main duty, will be given additional priority than other persons who might be

homeless or owed any other homelessness duty. The advice should provide a justification for this, that being that typically persons out these duties are occupying temper accommodation and would benefit from being rehoused into settled accommodation as quickly as possible. The advice should also explain that other persons who are homeless or owed other homelessness duties, including those who are threatened with homelessness, I've been given the greater priority that they're entitled to in law. The advice should include a clear explanation of the legal definition of homelessness, set out the different homelessness duties that someone might be owed and explain the rights persons who are homeless or owed a homeless duty are afforded in housing allocation is law. It's important to note that Liverpool City Council has commissioned an independent review how best to allocate social rented housing to persons who are homeless or owed a homelessness duty, findings from which can inform any future amendments to Property Pool Plus scheme in respect of administering applications from applicants in these circumstances. Notwithstanding this, any future guidance issued by the UK Government on making allocations to homeless applicants, will be fully incorporated as required, into the operation of the Property Pool Plus.

Comments were made that more priority should be given to victims of domestic abuse. As mentioned previously in this paper, it will be important to publish specific advice for victims of domestic abuse, setting out how their applications will be handled and the degree of parity that they are being afforded and that the property pool plus scheme gives an additional property beyond the legal minimum requirements.

Comments were made that more priority should be given to victims of antisocial behaviour. Applicants in such circumstances can be afforded a reasonable preference for an allocation on the grounds of hardship. Consideration can be given to making this clearer within the rules that have been proposed.

Comments were made that more priority should be given to applicants living in the private rented sector whose homes are unaffordable and or in a state of disrepair. Anyone whose home is unreasonable to occupy due to affordability or fitness of condition (along with other matters such as overcrowding and domestic abuse) can approach a local authority and make an application for homelessness assistance. Following an assessment of the facts, the local authority will determine what duty, if any, is owed to a household in such circumstances. Where a local authority finds that a household's home is unaffordable or in an unfit condition, within the legal meaning of these terms, they will be entitled to receive assistance to obtain suitable accommodation. This would also result in an applicant being awarded a band B or band a status, subject to the homeless duty they might be owed. Other action might be taken by the local authority under the housing health and safety rating system, which could also result in an applicant being awarded a band B status, due to them living in unsatisfactory housing conditions.

Comments were made that those in high priority should be give more choice. Options in this respect were explored in response to the previous question. In summary, these could include amending the number of bids an applicant is entitled to make in any given

week, along with varying the number of refusals of offers an applicant is entitled to make. There is also an option to abandon the current choice-based lettings model and pursue an alternative, such as inviting applicants to select an area a preference they would like to live in (based on an electoral ward boundary for example) and to make a direct match when properties become available in an applicant's chosen locality. These options might be explored when the scheme is next reviewed.

Question 4 – Do you agree or disagree with the proposals for prioritising people waiting for an allocation of social housing?

An overall average of % of consultees responded to this question, 60% of respondents agreed with proposed qualification criteria, compared to 21% disagreeing and 33% providing no response.

	Halton	Knowsley	Liverpool	Sefton	Wirral
Agree	54%	46%	46%	75%	51%
Disagree	16%	18%	19%	25%	19%
No response	30%	36%	35%	0%	30%

Comments were made about the community contribution provisions set out within the proposed amended scheme. Assertions were made that the definition of commuter contribution was unclear and unfair. Statutory guidance encourages like authority to adopt a curious your contribution criteria. The concept a committee contribution has been tested in the courts and it is these judgements that have directly informed how community contribution has been framed for the purposes of the amended scheme. There is a clear definition of what constitutes work and education and the evidence that must be sought to confirm these arrangements are in place. Furthermore, those who are unable, as opposed to on willing, to make a community contribution have also been taken account of and have been provided for within the rules.

Comments were made about affording more priority to applicants who are in employment but unable to access other housing markets. The scheme does not take account of earnings when determine qualification or prioritisation (although savings and assets are considered), nor are earnings taken account of at any time subsequent to a person becoming a tenant. Applicants who are in employment but whose earnings for below the required income levels to purchase a home, would benefit from more information via Property Pool Plus, about the array of low-cost home ownership schemes that they might benefit from.

Comments were made that more importance should be given to an applicant's proximity to their family. An applicant's family being resident in an area is one of the criteria that will be used to determine whether a person qualified to join the scheme. Where an

applicant either Gibbs or receives care from or to their family, these factors will be taken account of when determining the degree of prioritisation, they should be afforded.

Comments were made that indicated some respondents are confused about the bidding process, how banding status and duration on the scheme might affect the outcome of any given bid, subject to which other applicants might have also placed a bid on any given property. It will be important to communicate very clearly (ideally using illustrations and or videos alongside text or narrative) how the bidding process works, using a variety of illustrated examples to demonstrate the various outcomes that might occur.

Comments were made that raise concern about not all properties being advertised via Property Pool Plus and that this gave rise to a suspicion of a lack of transparency. Encouraging housing associations to advertise all vacant properties available to let via Property Pool Plus, regardless as to whether these are been allocated via the scheme rules or a housing associations own policy, will help to positively deal with these assertions. It will be important to continue the practice of publishing what property (by location, type and bedrooms) was let to which applicant (by band and waiting time), as this allows for everyone to have insight into typical waiting times.

Comments were made that there is a need for more housing, particularly larger family homes. This illustrates what are the limitations of a housing allocation scheme, in the fact that it does not increase the supply of homes available to that, but is solely concerned with making sure those that are available, are allocated in the fairest way possible. Notwithstanding this, intelligence that can be collected from those registered with Property Pool Plus, is invaluable to inform decision-makers how best increase the supply of new housing, while making the best use of existing homes.

Other comments

Comments were made that waiting time rather than banding status should be the predetermined factor for allocating a home. To ensure the scheme complies with statute, Regulations and statutory guidance, a balance of both waiting time and need must be taken account of when making decisions about applications.

Comments were made about the dissatisfaction with information and assistance applicants received prior to and at the point of joining property pool plus and also once they had been accepted onto the scheme. There was a also criticism for the IT software that Property Pool Plus uses. Improving information and assistance provided to applicants with themes picked up in the review we carried out in 2019. Our recommendations regarding training and centralising of services will help to reduce dissatisfaction with these issues. Notwithstanding this, regular customer satisfaction survey should be carried out to identify opportunities for continuous improvement. There's already an intention to undertake a market testing exercise of software databases, to operate the Property Pool Plus scheme. It will be important to ensure there are opportunity to involve applicants in the design of any tender specification and the decision-making process for selecting any future IT supplier.

Conclusion

The feedback provided from this consultation exercise will be carefully considered and acted on as required, when formulating the final amended version of the Property Pool Plus scheme. It is anticipated that any changes made will not substantially change the objectives and framing of the scheme, enough to warrant any further public consultation. A final version of the amended scheme will be put forward to elected councillors for them to decide whether to adopt it. Elected Council will be informed of consultation feedback and any changes acted upon as a result of it.

Appendix 1 – Halton Public Consultation Summary

Following a 12-week public consultation on the proposed changes to the Liverpool City Region Allocations Scheme, the responses received by Halton Borough Council are detailed below.

Who

The following table provides a summary of who responded to the survey:

Who	Total
as yourself	433
on behalf of an organisation	0
Grand Total	433

A total of 433 responses were received by HBC, 433 of which were responding as residents

Qualifying Criteria

The following table provides a summary of whether respondents agreed or disagreed with the proposed qualifying criteria:

Count of Agree or disagree with qualification criteria	
Agree	294
Disagree	85
Grand Total	379
(blank)	54 (12%)

This section received a response rate of 88%. Of the 379 respondents, 69% agreed with the qualifying criteria proposals while 20% disagreed.

The following table categorises any additional comments respondents had on the qualifying criteria proposals:

Count of Qualifying criteria comments category	
ASB	5
Children In flats	1
Disagree with armed forces	2
Disagree with local connection	10
Disagree with rent arrears levels	22
Equity shouldn't be considered	5
Increased priority for workers	5
More support for disabled applicants	2
More support for homeless	2
More support in for DV cases	7
Not enough support for offenders	2
Grand Total	63

A total of additional comments were received for this section, with the 3 most common themes detailed below:

- 22 (35%) respondents stated that they disagreed with proposed rent arrears level before reducing an applicant's eligibility, many highlighting the financial difficulties currently facing residents.
- 10 (16%) respondents stated that they disagreed with local connection.
- 7 (11%) respondents felt points surrounding victims of DV seem to be penalising

Offering Choice

The following table provides a summary of whether respondents agreed or disagreed with the proposals on offering choice:

Count of Agree or disagree with offering choice	
Agree	276
Disagree	79
Grand Total	355
(blank)	78 (18%)

This section received a response rate of 82%. Of the 355 respondents, 64% agreed with the proposals while 18% disagreed.

The following table categorises any additional comments respondents had on the offering choice proposals:

Count of Offering choice comments category	
Auto Bidding isn't accurate to areas	1
Improved property information	3
Increase number of bids allowed	12
No definition of reasonable	3
Banding system confusing	5
More/fair choices available	9
Internet access limits to some people	1
Refusals too harsh	15
Grand Total	49

A total of 49 additional comments were received for this section, with the 2 most common themes detailed below:

- 15 (31%) respondents felt the proposed number of refusals per applicant prior to decreasing priority was too harsh.
- 12 (24%) respondents stated that an increase in the number of bids should be allowed.

Additional Preference

The following table provides a summary of whether respondents agreed or disagreed with the proposals on additional preference:

Count of Agree or disagree with additional preference	
Agree	287

Disagree	42
Grand Total	329
(blank)	104 (24%)

This section received a response rate of 76%. Of the 329 respondents, 66% agreed with the proposals while 10% disagreed.

The following table categorises any additional comments respondents had on the additional preference proposals:

Count of Additional preferences comments category	
ASB	1
Domestic violence	4
Downsizing	2
Foster carers	1
Rigid rules instead of case by case analysis	3
More support for homeless	3
More support for medical needs	7
More support for workers	1
More support for young people	2
Overcrowding	6
Overcrowding too generous	3
Should be time based	1
Grand Total	34

A total of 34 additional comments were received for this section, with the 2 most common themes detailed below:

- 7 (21%) respondents felt more support needed to be provided to applicants with medical needs, this ranged from increased priority or process support.
- 6 (18%) respondents felt that not enough priority is given to those in overcrowded situations and felt unsupported .

Prioritisation

The following table provides a summary of whether respondents agreed or disagreed with the proposals on prioritisation:

Count of Agree or disagree prioritisation	
Agree	232
Disagree	71
Grand Total	303
(blank)	130 (30%)

This section received a response rate of 70%. Of the 303 respondents, 54% agreed with the proposals while 16% disagreed.

The following table categorises any additional comments respondents had on the prioritisation proposals:

Count of Prioritisation comments category	
Children in flats	2
Disagree with the bandings	3
Disagree with increase preference for workers	3
Downsizing	1
Financial support	1
More support for homeless	2
More support for workers	5
More support for young people	2
More support medical needs	7
More support for DV cases	1
Should be based on time	1
Shouldn't be based on time	4
Need to be based on individual personal circumstances	5
Suitability	1
Grand Total	38

A total of 38 additional comments were received for this section, with the 3 most common themes detailed below:

- 7 (18%) respondents felt more support needed to be provided to applicants with medical needs, this ranged from increased priority or process support.
- 5 (13%) respondents felt that more support should be given to workers and feel they wait and have no success in obtaining secure housing
- 5 (13%) respondents stated that priority should be given on individual circumstances and not apply a 'blanket' approach in banding people within the same band when some situations could be more priority than others.

Any other comments

The following table categorises any additional comments respondents had on the proposed Allocations Scheme:

Count of Any other comments category	
Auto bids should go on at beginning of cycle	1
ASB	2
Bedroom criteria	4
Better customer information	2
Community contribution	1
Fair process	6
Quicker Process	3
Increased bids	1
Less Priority for workers	1
Localised approach	2

More for transfers	5
More personalised approach	14
More social housing	5
More support for homeless	2
More support for medical needs	6
More support for workers	19
More support for overcrowding	3
Poor service	6
Property quality	1
Priority with those who have access to children	1
Time over need	8
Time of bid	3
Want as well as need	1
Workers shouldn't be eligible	1
Under occupation support	2
Grand Total	100

A total of 100 additional comments were received for this section, with the 3 most common applicable themes detailed below:

- 19 (19%) respondents stated that more support and priority should be given to those in employment and currently feel the current system is penalising them.
- 14 (14%) respondents felt a more personalised approach should be adopted and that the policy is restrictive to individuals needs
- 8 (8%) respondents stated that increased priority should be given to applicants who have a higher waiting time rather than banding.

Appendix 2 – Knowsley Public Consultation Summary

Following a 12-week public consultation on the proposed changes to the Liverpool City Region Allocations Scheme, the responses received by Knowsley Metropolitan Borough Council are detailed below.

Who

The following table provides a summary of who responded to the survey:

Who	Total
as yourself	657
on behalf of an organisation	1
Grand Total	658

A total of 658 responses were received by KMBC, 657 of which were responding as residents while 1 respondent was responding on behalf of an organisation.

Qualifying Criteria

The following table provides a summary of whether respondents agreed or disagreed with the proposed qualifying criteria:

Count of Agree or disagree with qualification criteria	
Agree	383
Disagree	166
Grand Total	549
(blank)	109

This section received a response rate of 83%. Of the 549 respondents, 70% agreed with the qualifying criteria proposals while 30% disagreed.

The following table categorises any additional comments respondents had on the qualifying criteria proposals:

Count of Qualifying criteria comments category	
Agree with support for armed forces	3
ASB	7
Children In flats	1
Disagree with armed forces	4
Disagree with disqualification	1
Disagree with local connection	13
Disagree with rent arrears levels	29
Equity shouldn't be considered	12
Exclude previous convictions	1
Income cap	5
Increased priority for workers	4
Increased priority for overcrowding	1

More support for disabled applicants	1
More support for homeless	4
More support for older applicants	3
N/A	7
Not enough support for offenders	1
Personal approach required	8
Grand Total	105

A total of 105 additional comments were received for this section, with the 3 most common themes detailed below:

- 29 (28%) respondents stated that they disagreed with proposed rent arrears level before reducing an applicant's eligibility, many highlighting the financial difficulties currently facing residents.
- 13 (12%) respondents stated that they disagreed with local connection.
- 12 (11%) respondents felt that an applicant's equity or savings should not be taken into consideration when applying for PPP.

Offering Choice

The following table provides a summary of whether respondents agreed or disagreed with the proposals on offering choice:

Count of Agree or disagree with offering choice	
Agree	358
Disagree	142
Grand Total	500
(blank)	158

This section received a response rate of 76%. Of the 500 respondents, 72% agreed with the proposals while 28% disagreed.

The following table categorises any additional comments respondents had on the offering choice proposals:

Count of Offering choice comments category	
ASB	1
Choice	2
Improved property information	11
Increase number of bids allowed	4
More properties	6
More support for disabled applicants	3
More support for families	2
More support for older applicants	1
No definition of reasonable	10
Refusals too harsh	36
Grand Total	76

A total of 76 additional comments were received for this section, with the 3 most common themes detailed below:

- 36 (47%) respondents felt the proposed number of refusals per applicant prior to decreasing priority was too harsh.
- 11 (14%) respondents stated that improved information needs to be provided to applicants prior to bidding on properties, this included but not limited to; better property photos, viewings, floor plans.
- 10 (13%) respondents expressed a concern that the consultation/policy did not provide a definition of what would be considered a 'reasonable' offer and may lead to inconsistency or unfair decisions.

Additional Preference

The following table provides a summary of whether respondents agreed or disagreed with the proposals on additional preference:

Count of Agree or disagree with additional preference	
Agree	368
Disagree	64
Grand Total	432
(blank)	226

This section received a response rate of 66%. Of the 432 respondents, 85% agreed with the proposals while 15% disagreed.

The following table categorises any additional comments respondents had on the additional preference proposals:

Count of Additional preferences comments category	
ASB	1
Domestic violence	2
Downsizing	2
Foster carers	1
Key workers	1
Less choice for homeless	1
More support for homeless	3
More support for medical needs	8
More support for workers	3
More support for young people	1
Overcrowding	3
Overcrowding too generous	5
Should be time based	1
Grand Total	32

A total of 32 additional comments were received for this section, with the 4 most common themes detailed below:

- 8 (25%) respondents felt more support needed to be provided to applicants with medical needs, this ranged from increased priority or process support.

- 5 (16%) respondents felt that the additional preference for overcrowding was too generous and people within this category had made choices that led them to become overcrowd and should therefore not receive any additional priority.
- 3 (9%) respondents felt that overcrowded applicants should receive more priority than currently proposed.
- 3 (9%) respondents stated that more support was required for homeless applicants.

Prioritisation

The following table provides a summary of whether respondents agreed or disagreed with the proposals on prioritisation:

Count of Agree or disagree prioritisation	
Agree	300
Disagree	124
Grand Total	424
(blank)	234

This section received a response rate of 64%. Of the 424 respondents, 71% agreed with the proposals while 29% disagreed.

The following table categorises any additional comments respondents had on the prioritisation proposals:

Count of Prioritisation comments category	
Age designations	1
ASB	2
Bidding	1
Children in flats	1
Community contribution	8
Disagree with local connection	3
Downsizing	1
Financial support	2
Homeowners	1
Increase bids	1
Increased priority for armed forces	1
Key workers	1
More social housing	1
More support for disabled applicants	1
More support for homeless	3
More support for workers	7
More support for young people	1
More support medical needs	9
Poor property conditions	1
Poor system	11

Refusals	4
Should be based on time	1
Suitability	1
Want over need	1
Grand Total	64

A total of 64 additional comments were received for this section, with the 4 most common themes detailed below:

- 11 (17%) respondents commented on their overall dissatisfaction with Choice Based Lettings system based on a banding system.
- 9 (14%) respondents felt more support needed to be provided to applicants with medical needs, this ranged from increased priority or process support.
- 8 (13%) respondents raised concerns over the community contribution proposal, highlighting the lack of definition potentially leading to a lack of transparency or fairness and the potential equality issues facing those who are unable to provide 'community contribution'
- 7 (11%) respondents stated that increased priority should be given to applicants in employment who are unable to access other housing markets.

Any other comments

The following table categorises any additional comments respondents had on the proposed Allocations Scheme:

Count of Any other comments category	
Age designated	2
ASB	6
Bedroom criteria	5
Better customer information	1
Community contribution	1
Disagree with rent arrears levels	1
Disrepair	1
Domestic abuse	2
Fair process	1
Finance	2
Increased bids	2
Less priority for armed forces	1
Less priority for convictions	1
Less priority for homeless	3
Local connection	5
Localised approach	1
More for transfers	1
More personalised approach	9
More social housing	17
More support for homeless	4

More support for homeowners	2
More support for medical needs	9
More support for workers	13
N/A	21
Poor service	26
Property quality	1
Refusals	1
Shorter bidding cycles	1
Single households	5
Time over need	6
Want as well as need	4
Workers shouldn't be eligible	4
Grand Total	159

A total of 159 additional comments were received for this section, with the 3 most common applicable themes detailed below:

- 26 (16%) respondents stated that they felt the overall service offered to customers was poor, the reasons for this included but were not limited to; poor IT system, poor customer service, disagree with the CBL approach.
- 17 (11%) respondents felt the Council should focus on ensuring the development of more social housing provision within the Borough to help meet residents' housing needs.

15 (9%) respondents stated that increased priority should be given to applicants in employment who are unable to access other housing markets.

Appendix 3 – Liverpool Public Consultation Summary

Easy Read

107 people answered

As yourself 100%

Q. Do you agree with who cannot apply for social housing?

Yes- 58.87%

No- 21.49%

No response – 10.28%

Main Comments:

- Local connection rules should be relaxed and made clearer
- More lenient approach should be taken on rent arrears
- Working people should be given more priority
- Disabled people should be given highest priority
- There should be greater recognition of problems with PRS

Q. Do you agree to these ideas about offering choice?

Yes- 52.33%

No- 38.31%

No response – 9.34%

Main Comments:

- Choice should be given re areas and properties
- Should be a limit on number of offers
- Homeless applicants should be given as much choice as everyone else
- People wanting to free up larger accommodation for families should be helped more
- There should be a separate list for homeless people

Q. Do you agree to add these reasons to why we give extra priority to people?

Yes- 69.15%

No- 16.82%

No response – 14.01%

Main Comments:

- Link between ASB and health and safety should be recognised more
- There should be more transparency in assessment of health needs
- Homeless people should be assessed separately

Q. Do you agree with using bands to put people in priority order for social housing?

Yes- 29.90%

No- 51.40%

No response – 18.69%

Main Comments:

- Lots of people in Band C who have no chance of being rehoused
- There should be a separate band for working people

- Credit should be given for waiting time
- Why should community standing be considered?
- Concerns that people manipulate the system and provide false information
- PPP has taken away personal attention to customers

Other Comments:

- It should be easier for people to explain their need for housing
- Concerns about digital exclusion and reliance on IT system
- Should be a limit of £10K on capital
- Quotas should be applied to the bands
- More help for people suffering ASB
- Reviews of applications should be undertaken when they have been registered for a given length of time

Standard Version

1486 responses

As yourself – 100%

Q. Do you agree or disagree with the proposed qualification criteria?

Agree- 59.55%

Disagree- 21.19%

No response – 19.24%

Main Comments:

- Local connection rules should be relaxed or removed
- Many comments that rent arrears exclusion rules were too harsh
- General support for ASB disqualifications
- A number of respondents felt having savings should not stop people applying or £16K limit was too low

Q. Do you agree or disagree with the proposals for offering choice?

Agree- 51.48%

Disagree- 23.82%

No response – 24.56%

Main Comments:

- There should be more information and photographs so that people can make informed choices about properties
- Lots of comments disagreeing with limits on refusals ranging from people having unlimited right to refuse to having the same number of refusals irrespective of priority
- Need a clear definition of what constitutes a 'reasonable refusal'
- People should be able to make unlimited bids in the cycle
- Bidding should be scrapped and replaced with a waiting list

Q. Do you agree or disagree with the proposals for affording additional preference to people in the above specified circumstances?

Agree- 56.59%

Disagree- 12.44%

No response – 30.95%

Main Comments:

- Several comments supporting needs-based approach
- Overcrowding should be given a greater priority
- Greater priority should be given for domestic abuse – several respondents were victims of DA
- ASB victims should be given more support
- Disabled people having real problems accessing suitable accommodation
- Mental health issues are understated
- General support for homelessness as a priority but terms such as relief and prevention should be better explained

Q. Do you agree or disagree with the proposals for prioritising people waiting for an allocation of social housing?

Agree- 45.82%

Disagree- 19.31%

No response – 34.85%

Main comments:

- People felt it would be difficult to define community contribution
- Employment shouldn't be a factor in prioritising applications
- Proximity to family should be given greater weighting
- Difference between medical priorities in B and C are not clear

Other comments:

- Many respondents felt the proposals were fair
- Administering partners should adopt a more personalised approach
- Some respondents clearly still confused about the bidding process and how position on the list changes during bidding cycle
- There should be more transparency e.g. why are not all properties advertised
- Several people highlighted difficulties and cost of living in the PRS
- Many respondents recognised the need for more housing particular some types e.g. larger family homes

COMBINED RESULTS (1593)

Q1. Do you agree or disagree with the proposed qualification criteria?

Agree- 59.15%

Disagree- 33.77%

No response- 18.64%

Q2. Do you agree or disagree with the proposals for offering choice?

Agree- 51.53%

Disagree- 22.22%

No response- 23.54%

Q3. Do you agree or disagree with the proposals for affording additional preference to people in the above specified circumstances?

Agree- 57.43%

Disagree- 12.74%

No response- 28.56%

Q4. Do you agree or disagree with the proposals for prioritising people waiting for an allocation of social housing?

Agree- 44.00%

Disagree- 20.02%

No response- 35.96%

Appendix 4 – Sefton Public Consultation Summary

Easy Read

73 people answered

As yourself 100%

Q. Do you agree with who cannot apply for social housing?

Yes- 59.7%

No- 40.3%

Main Comments:

- Debt shouldn't prevent being accepted onto waiting list
- Rules for bedroom sharing appalling
- More freedom of movement across LCR
- Shouldn't be £16k limit

Q. Do you agree to these ideas about offering choice?

Yes- 50%

No- 50%

Main Comments:

- People in highest priority should still have choice, esp homeless
- Disabled people should be able to apply for whatever comes available

Q. Do you agree to add these reasons to why we give extra priority to people?

Yes- 88.33%

No- 11.67%

Main Comments:

- Priority should be given to those who need support from family to allow to move closer
- People who have 2 additional rooms should be given priority in order to free up that home for others

Q. Do you agree with using bands to put people in priority order for social housing?

Yes- 86%

No- 14%

Main Comments:

- Key workers & community contribution should be given a priority

Other Comments:

- Overcrowding households should only be able to exchange
- Need more bungalows
- Priority for local residents

Standard Version

646 responses

As yourself – 645

On behalf of Organisation – 1 (Sefton based organisation)

Q. Do you agree or disagree with the proposed qualification criteria?

Agree- 73.6%

Disagree- 26.4%

Main Comments:

- Covid should now be taken into account
- Disagree about preferential treatment to Armed Forces
- 16k not a lot of money these days to penalise
- Could be good mitigating reasons for arrears/debt
- Seems a blanket decision concerning homeowners but there may be other circumstances where social housing is needed

Q. Do you agree or disagree with the proposals for offering choice?

Agree- 73.5%

Disagree- 25.5%

Main Comments:

- People should not be limited – all levels should have 3
- Properties should be described better. Photos, floor plans etc

Q. Do you agree or disagree with the proposals for affording additional preference to people in the above specified circumstances?

Agree- 83%

Disagree- 17%

Main Comments:

- Assistance for those in the PRS, unaffordable and in disrepair should count
- Higher priorities should have more choice

Q. Do you agree or disagree with the proposals for prioritising people waiting for an allocation of social housing?

Agree- 74.5%

Disagree- 25.5%

Main comments:

- Community Contribution needs to be clearly defined
- Young people on low wages need supporting more
- Those struggling in PRS need help
- Individual circumstances need to be considered in all cases

Other comments:

- Workers should be given higher priority

COMBINED RESULTS (719)

Q1. Do you agree or disagree with the proposed qualification criteria?

Agree- 72%

Disagree- 28%

Q2. Do you agree or disagree with the proposals for offering choice?

Agree- 71%

Disagree- 29%

Q3. Do you agree or disagree with the proposals for affording additional preference to people in the above specified circumstances?

Agree- 84%

Disagree- 16%

Q4. Do you agree or disagree with the proposals for prioritising people waiting for an allocation of social housing?

Agree- 76%

Appendix 5 – Wirral Public Consultation Summary

In total, **993** respondents completed the survey identifying 'Wirral' as their LA.

Respondent Profile

100% of respondents taking part in the survey did so as 'individuals.'

0% of respondents taking part in the survey did so on behalf of an organisation.

Quantitative and qualitative analysis

"Do you agree or disagree with the proposed qualification criteria?"

84.6% of all respondents answered this question.

15.4% of all respondents did not answer this question.

Of the respondents that answered this question:

72.74% (611) agreed with the proposed qualification criteria.

27.26% (229) disagreed with the proposed qualification criteria.

192 comments to this question were submitted.

A significant number of comments focussed on rent arrears and that a blanket approach to this issue does not consider any personal circumstances that led to the accrual of arrears. Many respondents felt that cases of former tenancy arrears should be viewed individually.

"Unfortunately, people who have built up rent arrears of more than a month are penalised if they have lived in rented accommodation for years. This could actually be due to a number of factors, income drops from children moving out, a spouse dying, hospitalisation and out of work etc. After currently being served with a section 21 after FIFTEEN years of a tenancy, privately renting, I was penalised for having just 6 weeks arrears! In FIFTEEN years. No consideration to what caused it, like a criminal assault on my daughter which required surgery and me being out of work to care for her!"

Disqualification of home-owners was another recurrent theme as respondents also felt that this did not take into consideration any personal circumstances such as those for whom their accommodation is suitable (e.g. as a consequence of disability etc)

"The proposed policy outlined that they would disqualify anyone owning a property from their list, however, as I have said previously this would bring great detriment and discrimination to the elder 60+ years, who may require sheltered accommodation either due to their health, wellbeing or they are suffering harassment and the elderly need support, so, even if they own their own home and they should Not have to sell their property until they have secured a sheltered accommodation property, they need support and make friends within sheltered accommodation environment, it would be unlawful to force an elderly person to sell their home, but if the elderly person is offered a shelter accommodation place, they should also be given 3 choices of offers."

“Do you agree or disagree with the proposals for offering choice?”

79.75% of all respondents answered this question.

20.25% of all respondents did not answer this question.

Of the respondents that answered this question:

75% (594) agreed with the proposals for offering choice.

25% (198) disagreed with the proposals for offering choice.

153 comments to this question were submitted.

A large number of respondents felt that a maximum of three bids per week is insufficient, with some respondents indicating that applicants should be allowed an unlimited number of bids.

“It takes a long time to get a property on PPP therefore you should be able to bid for more than 3 properties.”

“Do you agree or disagree with the proposals for affording additional preference to people in the above specified circumstances?”

74.8% (743) of all respondents answered this question.

25.2% (250) of all respondents did not answer this question.

Of the respondents that answered this question:

84.5% (628) agreed with the proposals for affording additional preference to people in the above specified circumstances.

15.5% (115) disagreed with the proposals for affording additional preference to people in the above specified circumstances.

122 comments to this question were submitted.

Generally, there was agreement amongst the respondents regarding additional preference. However, there were a number of remarks made that suggested that there should be no preferential treatment and that all applicants should be treated the same irrespective of their circumstances.

A recurring theme amongst those that disagreed was that people in employment should also be afforded additional preference.

“I think some preference needs to be given to people like us who are both in employment, paying high private rent and in no position to buy a home so that we could have a chance at getting a home in which to bring up our family.”

“Do you agree or disagree with the proposals for prioritising people waiting for an allocation of social housing?”

70% (695) of all respondents answered this question.

30% (298) of all respondents did not answer this question.

Of the respondents that answered this question:

73.2% (509) agreed with the with the proposals for prioritising people waiting for an allocation of social housing.

26.8% (186) disagreed with the with the proposals for prioritising people waiting for an allocation of social housing.

139 comments to this question were submitted.

Some respondents queried the term 'community contribution' and how this could be assessed fairly. Some comments suggested that this would indirectly penalise people with ill health s their ability to contribute may be limited.

Employment was another recurrent theme, with some remarks suggesting that the proposals disadvantage non-working households whereas, conversely, some respondents commented that the proposals didn't do enough to support employed households.

Do you have any other comments about the proposed policy for allocating social housing?

275 comments to this question were submitted.

The responses to this question were varied, with no particular stand-out theme.

Again, some respondents felt that the proposed system neglected people in full-time employment.

Some respondents suggested that offers of housing should be based solely on the length of time that a registration has been active.

The appropriateness of blanket policies, rather than consideration of individual personal circumstances, was again questioned by respondents



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