PROPOSED CHANGES TO THE HOMECHOICE NORTH
SOMERSET LETTINGS AND ASSESSMENT POLICY

CONSULTATION

VERSION CONTROL
v0.1 – Outline, 3 July 2012
v0.2 – First draft, 4 July 2012
v0.3 – Second draft (after draft policy written), 12 July 2012
v0.4 – Third draft (after comments from MH/KT), 17-19 July 2012
v0.5 – Fourth draft, 23-28 August 2012
v0.6 – Reference Group draft, 29 August 2012
v0.7 – Fifth draft, 30 August 2012
v0.8 – Consultation draft, 1 October 2012
CONTENTS

1. INTRODUCTION AND BACKGROUND ................................................................. 2
   1.1 Introduction .................................................................................................. 2
   1.2 Background ............................................................................................... 2
   1.3 Aims and Objectives .................................................................................. 2
   1.4 Summary of Proposed Changes .................................................................. 4

2. PROPOSED ELIGIBILITY CHANGES ............................................................... 7
   2.1 Legal Framework ....................................................................................... 7
   2.2 Members of the Armed Forces .................................................................. 7
   2.3 Local Connection to North Somerset ....................................................... 8
   2.4 Homeless applicants ................................................................................ 9
   2.5 Owner Occupiers ..................................................................................... 10
   2.6 Sufficient financial resources ................................................................. 10
   2.7 Intentionally homeless/Anti-Social Behaviour/Arrears ............................ 11
   2.8 Perpetrators of Hate Crime/Domestic Violence ...................................... 11
   2.9 Penalty Clause ......................................................................................... 12

3. PREFERENCE GROUPS ..................................................................................... 13
   3.1 Legal Framework ....................................................................................... 13
   3.2 Members of the Armed Forces .................................................................. 13
   3.3 Employment .............................................................................................. 14
   3.4 Under-Occupying ..................................................................................... 14
   3.5 Split Families ............................................................................................ 15
   3.6 Benefits Eligible ........................................................................................ 15
   3.7 In Supported Housing ............................................................................... 15
   3.8 Children in Flats ....................................................................................... 15
   3.9 Other Homeless applicants ..................................................................... 16
   3.10 Local Priorities ....................................................................................... 16
   3.11 Welfare Priority ...................................................................................... 16

4. OTHER CHANGES ............................................................................................ 17
   4.1 Exceptional circumstances ....................................................................... 17
   4.2 Contrived circumstances ......................................................................... 17
   4.3 HomeChoice West ................................................................................... 17

5. NEXT STEPS .................................................................................................... 17
1. INTRODUCTION AND BACKGROUND

1.1 Introduction

The Localism Act 2011 (“the 2011 act”), introduced by the coalition government, contains a number of changes to the Housing Act 1996 (“the 1996 act”) relevant to local authority housing departments and registered providers of affordable housing.

This discussion paper sets out what these provisions are, how North Somerset Council (“we”, “the council”) propose to change our policy in the light of these provisions, and what we see as the implications of such changes. It also asks for your views on the proposals, which we will take into account in deciding on the changes that we will implement.

1.2 Background

One of the powers the act contains gives local authorities greater control over their housing register, including the ability to determine which categories of applicants should qualify to join the register/waiting list for affordable housing. This is different from the current situation, in which anybody (with very few exceptions) may join the waiting list, no matter what their level of housing need. The government will retain a role in determining which groups should be given priority for affordable housing, by preserving the current reasonable preference categories.

Our existing HomeChoice Lettings and Assessment Policy sets out the way that social housing in North Somerset is allocated and the levels of priority given to applicants in certain circumstances. We intend to review the whole policy to better reflect the social housing needs of North Somerset residents, by excluding certain groups from the register and by re-evaluating the priority banding criteria.

For each area we intend to change, this report sets out the proposed change and the reasons why we want to make this change, and any potential issues and questions that arise. Please note we will be carrying out an Equalities Impact Assessment (EIA) on our revised HomeChoice Lettings and Assessment policy to mitigate any potential adverse effects to the groups from any changes.

1.3 Aims and Objectives

As set out above, the main aim of this review is to consider how the opportunities presented by the Coalition Government's changes to the Housing Act 1996 in relation to the allocation and letting of social housing can best be utilised in North Somerset. We have also taken into account revised guidance from the Department of Communities and Local Government (DCLG) set out in their recent Code of Guidance “Allocation of accommodation: Guidance for Local Housing Authorities in...

The changes we propose to make to the HomeChoice North Somerset Lettings and Assessment Policy seek to achieve 6 key aims

- To increase the likelihood of local people in housing need being allocated a social housing home in North Somerset.
- To support measures to reduce unemployment by prioritising those employed on low incomes
- To enable the Council to manage the expectations of those seeking social housing by excluding those people who have no realistic chance of being housed from the register
- To give greater housing priority to former members of the Armed Forces
- To promote good housing management and build stable communities by giving the opportunity to households in need who are likely to maintain their tenancies and be good neighbours
- To improve the operational efficiency of the HomeChoice service by reducing the amount of time that needs to be spent on managing the register

In putting forward these proposals we have taken into account a number of key issues in particular

- The need to give priority to applicants who meet the reasonable preference criteria set out in the Housing Act 1996.
- The high demand and limited supply of social housing in North Somerset.
- The need to ensure our policy helps to support measures to reduce unemployment
- Our wish to take account of the contribution made by former Armed Forces members and the commitments set out in the Military Covenant.
- The significant impact of anti social behaviour on the communities.
- The increasing financial pressures placed on Local Authorities and the need to work as efficiently as possible.
### 1.4 Summary of Proposed Changes

<table>
<thead>
<tr>
<th>Eligibility</th>
<th>Current Policy</th>
<th>Proposed Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>All applicants over 16 qualify to join the register.</strong></td>
<td></td>
<td>Only applicants who are “qualifying persons” would be able to join the register.</td>
</tr>
<tr>
<td><strong>Applicants without a local connection qualify, but are demoted one band.</strong></td>
<td></td>
<td>Applicants would need a local connection to qualify.</td>
</tr>
<tr>
<td><strong>A local connection is defined as either:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>  o Living in North Somerset for three of the last five years;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>  o Living in North Somerset for five consecutive years in the past;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>  o An immediate adult relative has lived in North Somerset for the last five years;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>  o Working in North Somerset for the last 12 months.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Former members of the Armed Forces without a local connection are demoted one band.</strong></td>
<td></td>
<td>Former members of the Armed Forces would qualify within five years of discharge, regardless of local connection.</td>
</tr>
<tr>
<td><strong>Approved homeless households who don’t meet the HomeChoice local connection definition are not demoted one band.</strong></td>
<td></td>
<td>Households approved as homeless by North Somerset Council would qualify automatically.</td>
</tr>
</tbody>
</table>
### Exclusions

<table>
<thead>
<tr>
<th>Current Policy</th>
<th>Proposed Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>- All applicants eligible for the register can bid, except for those who are suspended because of anti-social behaviour.</td>
<td>- Certain groups of applicants would be excluded from joining the register.</td>
</tr>
<tr>
<td>- Owner-occupiers are eligible, but are automatically placed in the lowest band.</td>
<td>- All owner-occupiers would be excluded from the register, except for owners of mobile homes or those in exceptional circumstances.</td>
</tr>
<tr>
<td>- Applicants assessed as having sufficient financial resources are eligible, but are automatically placed in the lowest band.</td>
<td>- Applicants assessed as having sufficient financial resources would be excluded from the register, except in exceptional circumstances.</td>
</tr>
<tr>
<td>- Sufficient financial resources are defined as combined income and savings of £25,000 for families without children, and £30,000 for applicants with children.</td>
<td>- Sufficient financial resources would be defined as combined income and savings of £25,000 for single applicants, £30,000 for couples without children, and £35,000 for applicants with children.</td>
</tr>
<tr>
<td>- Applicants found to be Intentionally Homeless are eligible.</td>
<td>- Applicants found to be Intentionally Homeless would be excluded for 3 years.</td>
</tr>
<tr>
<td>- Applicants guilty of anti-social behaviour can be suspended.</td>
<td>- Applicants or members of their household guilty of anti-social behaviour would be excluded for 3 years.</td>
</tr>
<tr>
<td>- Applicants who owe money to the council or housing associations are eligible, but may not be accepted for properties.</td>
<td>- Applicants who owe more than £200 to housing associations would be excluded until they make 12 regular repayments.</td>
</tr>
<tr>
<td>- Applicants who are guilty of a hate crime, racial incident or domestic abuse are eligible without penalty.</td>
<td>- Applicants who are guilty of a hate crime or racial incident would be excluded for 3 years.</td>
</tr>
<tr>
<td>- Applicants who deliberately falsify information on their application form remain eligible once their application is corrected.</td>
<td>- Applicants who deliberately falsify information on their application would be excluded for 3 years.</td>
</tr>
<tr>
<td>Banding</td>
<td>Current Policy</td>
</tr>
<tr>
<td>---------</td>
<td>-------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>• Former or serving members of the Armed or Reserve Forces are given no additional priority.</td>
<td>• Former or serving members of the Armed or Reserve Forces would receive a Band C award.</td>
</tr>
<tr>
<td>• Applicants who need to move in North Somerset to start a new job receive a Band C award.</td>
<td>• All applicants in employment in North Somerset of 16 or more hours a week, or those who need to move to start a new job, would receive a Band C award.</td>
</tr>
<tr>
<td>• Housing association tenants under-occupying family accommodation receive a Band A award.</td>
<td>• Housing association tenants under-occupying a property would receive a Band A award if they have two or more extra bedrooms, Band B if they have one extra bedroom.</td>
</tr>
<tr>
<td>• Applicants can be awarded Band A, B or C for welfare needs, depending on the severity.</td>
<td>• Applicants would only be able to receive a Band A welfare needs award for urgent cases.</td>
</tr>
<tr>
<td>• Applicants who are sofa-surfing have the same priority as those who are street homeless rough sleepers, receiving a Band B award.</td>
<td>• Rough sleepers would still be awarded Band B, but other homeless applicants would receive a Band C award.</td>
</tr>
<tr>
<td>• Applicants who are in a property in serious disrepair receive a Band A award.</td>
<td>• Applicants who are in a property in serious disrepair would receive a Band B award.</td>
</tr>
<tr>
<td>• Applicants who are in supported housing in North Somerset receive a Band A award when they are ready to move on, and those not ready to move on are awarded Band C.</td>
<td>• Applicants who are ready to move on from supported housing would receive a Band B award. No separate award would be made for those not ready to move on.</td>
</tr>
<tr>
<td>• Split families receive a Band B award.</td>
<td>• The Band B award would be removed, as split families can approach under homelessness law.</td>
</tr>
<tr>
<td>• Applicants receiving Housing Benefit, JSA, ESA or Pension Credit receive a Band C award.</td>
<td>• The Band C award would be removed.</td>
</tr>
<tr>
<td>• Applicants with children in upper floor flats receive a Band C award.</td>
<td>• The Band C award would be removed.</td>
</tr>
</tbody>
</table>
2. PROPOSED ELIGIBILITY CHANGES

2.1 Legal Framework

The council may only allocate social housing to people who are defined as ‘qualifying persons’. Subject to the requirement not to allocate to persons from abroad who are ineligible, and the exception for members of the Armed and Reserve Forces (in chapter 2.2 below), a housing authority may decide the classes of people who are, or are not, qualifying persons. Our proposals for changes are set out below.

In putting forward the changes we have taken into account that many people on the register have no realistic chance of getting a social housing property and that lots of time is wasted in assessing housing applications for people who will never get housed.

The current Lettings and Assessment policy allows all applicants over the age of 16 to join the register. The new policy would only allow people with a local connection who have a good chance of being rehoused to join the register.

PLEASE NOTE: THE FOLLOWING SECTIONS ARE A BRIEF DESCRIPTION OF THE PROPOSED CHANGES. FOR MORE DETAILED INFORMATION THE REPORT WILL NEED TO BE READ IN CONJUNCTION WITH THE FULL POLICY.

Eligible Groups

2.2 Members of the Armed Forces

2.2.1 Current Policy

The current policy doesn’t reflect the circumstances surrounding former Armed Forces personnel. Any former member of the Armed Forces without a local connection can join the register, but would be demoted one priority band.

2.2.2 Proposed Change

The new policy would define the following as qualifying persons:

- Members of the Armed Forces and former Service personnel within five years of discharge;
- Bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death as a result of service of their spouse or partner;
- Serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service.
2.2.3 Reasons
The Military Covenant\(^1\) makes it clear that the government has a responsibility to support our Armed Forces in return for the important contribution they make to the country. People that fall into the above groups are likely to be particularly disadvantaged by local connection requirements, and so cannot be subject to restrictions based upon where they live.

2.3 Local Connection to North Somerset

2.3.1 Current Policy
The current policy allows applicants without a local connection to join the housing register, but they are demoted one priority band. The current definition of a local connection is applicants that:

- Have, by choice, lived in North Somerset for three of the last five years preceding the date the application is made or reviewed; or
- Have, by choice, previously lived in North Somerset for five consecutive years; or
- Have an immediate adult relative (parents, children, siblings or grandparents) who has lived in North Somerset for the last five years; or
- Have retained permanent employment in North Somerset for at least the 12 months preceding the date the application is made or reviewed.

2.3.2 Proposed Change
The new policy would redefine the criteria for local connection, and define applicants who meet this new local connection as qualifying persons. The new definition is applicants that:

- Have, by choice, lived in North Somerset for the three consecutive years preceding the date the application is made or reviewed; or
- Have, by choice, previously lived in North Somerset for ten consecutive years no more than five years prior to the date the application is made or reviewed; or
- Have retained employment in North Somerset, of a minimum of 16 hours per week, for at least the 12 months preceding the date the application is made or reviewed.

Any applicants without a local connection would not be allowed to register, unless they meet another qualifying group.

2.3.3 Reasons
The council wishes to ensure that social housing properties in North Somerset are allocated to applicants who have a local connection to North Somerset. Since 2009,

\(^1\) The Allocation of Housing (Qualification Criteria for Armed Forces Personnel) (England) Regulations 2012

\:\\nas4\asmith\consultation\Homechoice\Proposed Changes to HomeChoice Policy.doc
4.6% of vacancies in North Somerset were allocated to applicants without a local connection at all, 15.8% of vacancies were allocated to applicants whose only local connection to North Somerset came via a relative, and a further 3.7% went to applicants who had only previously lived in North Somerset more than five years previously. Excluding these applicants will mean that more properties will go to local people.

Additionally, excluding all applicants without a local connection to North Somerset in line with the proposed definition would remove approximately 2,800 households (35%) from the register, almost all of whom are in the bottom priority band with little chance of being rehoused. This will allow council staff more time to efficiently assess the applications from local people who will now stand a better chance of getting a social housing tenancy.

Q1. Do you agree with our proposals for applicants with local connections? If not, why not?

### 2.4 Homeless applicants

#### 2.4.1 Current Policy

The definition of a local connection in homelessness law is easier than the definition from the HomeChoice policy, so if the council accepts a full duty to help someone who is homeless and doesn't meet the HomeChoice local connection, the applicant gets awarded a local connection.

#### 2.4.2 Proposed Change

The new policy would define applicants to whom the council has a full homelessness or prevention duty as a qualifying person in all circumstances – even if they would otherwise fall in to an excluded group.

#### 2.4.3 Reasons

Homeless applicants have a clear need to be eligible for social housing for the council to discharge its duty to assist them, and they might not be eligible under the local connection policy (chapter 2.3). This reflects the current arrangement to override the local connection criteria.
Q2. Do you agree with our proposals for qualifying groups? If not, why not?

Q3. Have we missed any key issues?

Excluded Groups

2.5 Owner Occupiers

2.5.1 Current Policy
The current policy allows owner-occupiers to join the register, but automatically places them in the bottom priority band.

2.5.2 Proposed Change
The new policy would define all owner-occupiers except those as excluded persons.

2.5.3 Reasons
Social housing is designed for people who are most in need. Due to the scarcity of available properties we need to prioritise properties to those applicants who need them most. There are currently over 600 households on the HomeChoice register who own their own home, and no general needs vacancies since 2009 have been allocated to owner-occupiers.

Keeping owner-occupiers on the housing register falsely raises expectations of applicants unlikely to be offered a social housing property, and it is inefficient to process applications from applicants with little chance of being rehoused.

2.6 Sufficient financial resources

2.6.1 Current Policy
The current policy allows applicants with sufficient financial resources to rent privately to join the register, but automatically places them in the bottom priority band. Sufficient financial resources are defined as £25,000 combined savings and annual income for households without dependants, and £30,000 for applicants with dependants.

2.6.2 Proposed Change
The new policy would define single applicants with combined savings and annual income of more than £25,000, couples without dependants with combined savings
and annual income of more than £30,000, or applicants with dependants with combined savings and annual income of more than £35,000 as excluded persons.

2.6.3 Reasons
Because social housing is so scarce, the quickest way most people can get rehoused is in the private rented sector and we need to prioritise properties for applicants in most housing need. To reflect the increasing cost of living and the average income for North Somerset, the threshold for sufficient financial resources has been increased by £5,000.

There are currently over 200 households on the HomeChoice register who are assessed as having sufficient financial resources, and assessing their applications is inefficient. It also falsely raises expectations of applicants unlikely to be offered a social housing property.

2.7 Intentionally homeless/Anti-Social Behaviour/Arrears

2.7.1 Current Policy
The current policy suspends applicants who have a court order for anti-social behaviour or postponed possession from bidding for six months after the order expires.

2.7.2 Proposed Change
The new policy would define applicants who have been found to be intentionally homeless under Part VII of the Housing Act 1996, household members who are guilty of anti-social behaviour, and applicants who owe money to the council or a housing association as excluded persons for 3 years from the date of the original intentional decision.

2.7.3 Reasons
The council wants to promote good housing management and build stable communities by instead giving the opportunity to households in need who are likely to maintain their tenancies and be good neighbours.

We have balanced the need for our policy to give reasonable preference to entire categories of people who are homeless, or who need to move because of poor housing or welfare needs, against the facility of disqualifying individuals who have shown themselves to be unsuitable tenants or occupants in the past.

2.8 Perpetrators of Hate Crime/Domestic Violence

2.8.1 Current Policy
The current policy makes no provision for excluding or suspending perpetrators of hate crime or domestic violence
2.8.2 Proposed Change
The new policy would define applicants or members of their household who have been found guilty of racial harassment/abuse or another hate crime, or identified as a perpetrator of domestic violence by the multi-agency risk assessment conference (MARAC), as excluded persons for 3 years.

2.8.3 Reasons
The council wishes to promote equality within social housing communities by reducing the risk of racial or domestic violence.

2.9 Penalty Clause

2.9.1 Current Policy
The current policy only penalises applicants who give false information on their application if they are rehoused.

2.9.2 Proposed Change
The new policy would exclude applicants who are found to have given false information on their application for 3 years beyond when they become eligible.

2.9.3 Reasons
Applicants need a deterrent to prevent them from falsifying information to join the register or receive a higher priority banding.

Q4. Do you agree with our proposals for excluded groups? If not, why not?

Q5. Have we missed any key issues?
3. PREFERENCE GROUPS

3.1 Legal Framework

We are required by the 1996 act to have an allocation scheme for determining priorities. There are specific groups to whom we must give “reasonable preference” (RP):

(a) people who are homeless;
(b) people who are threatened with homelessness;
(c) people living in unsatisfactory housing conditions;
(d) people who need to move on medical or welfare grounds; or
(e) people who need to move to a particular area to avoid hardship (to themselves or others).

Beyond these groups, we can also give additional preference to other groups, and our current policy sorts priorities into bands. The summary of our proposals for changes to the existing policy is contained in Appendix B.

Paragraphs 3.2-3.4 describe proposed new banding criteria; Paragraphs 3.5-3.8 describe proposals to remove banding criteria; Paragraphs 3.9-3.10 describe banding criteria where priority would be reduced.

3.2 Members of the Armed Forces

3.2.1 Proposed Change

A minimum Band C housing need will be awarded to applicants who are either:
(a) former members of the Armed Forces,
(b) serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service,
(c) bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner, or
(d) serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service.

3.2.2 Reasons

The Military Covenant\(^2\) states that former members of the Armed Forces (and their families) should be given additional preference on the HomeChoice register if they fall into a “reasonable preference” category, and we intend to extend this priority to all cases.

---

3.3 Employment

3.3.1 Proposed Change
Band C would be awarded to applicants who have retained employment in North Somerset of a minimum of 16 hours per week for at least 12 months, as well as those who need to move to take up employment in North Somerset as is presently awarded.

3.3.2 Reasons
The council wants to support people who are working on a low income or who need to move to take up employment in the area. The policy currently only prioritises those who need to move because of their employment.

3.4 Under-Occupying

3.4.1 Proposed Change
Current social housing tenants would be awarded Band A if they are under-occupying by two or more bedrooms, or Band B if they are under occupying by one bedroom. The policy currently only awards a Band A priority to applicants giving up a house.

3.4.2 Reasons
The Welfare Reform Act 2012 introduces size criteria for working age Housing Benefit claimants living in the social rented sector, from April 2013. This means that tenants living in rented properties larger than they need will see their Housing Benefit reduced.

Housing benefit will be reduced by 14% for tenants with one bedroom more than they need, and 25% for two or more extra bedrooms. Applicants on full housing benefit who are under-occupying their properties may get into rent arrears if they cannot afford to pay their rent top-up.

Additionally, prioritising under-occupiers frees up the scarce larger accommodation for applicants who need it.

Q6. Do you agree with our proposals for new banding priorities? If not, why not?

Q7. Have we missed any key issues?
3.5 Split Families

3.5.1 Proposed Change
The existing Band B award for split families would be removed.

3.5.2 Reasons
The previous criteria for split families is duplicated within potential reasons for homelessness, so this circumstance is already reflected in the homelessness priorities and applicants meeting this criteria would be invited to make a homelessness approach.

3.6 Benefits Eligible

3.6.1 Proposed Change
The existing Band C award for applicants in receipt of benefits would be removed.

3.6.2 Reasons
The council wants to support people who are working on a low income, and keeping this priority would mean that there is no advantage for applicants who are working.

3.7 In Supported Housing

3.7.1 Proposed Change
The existing Band C award for applicants in supported housing would be removed.

3.7.2 Reasons
There is already a higher priority award for an applicant living in supported housing who are ready to move on. If an applicant in supported housing is not ready to move on, they should not be given additional priority.

3.8 Children in Flats

3.8.1 Proposed Change
The existing Band C award for applicants with children in upper-floor flats would be removed.

3.8.2 Reasons
Because of the scarcity of houses within social housing.

Q8. Do you agree with our proposals for removing banding priorities? If not, why not?
3.9 Other Homeless applicants

3.9.1 Proposed Change
Applicants who North Somerset Council has assessed as homeless but no duty applies, and those who have no where to live (e.g. No Fixed Abode ‘NFA’), will be awarded a Band C housing need.

3.9.2 Reasons
This change creates a distinction between applicants to whom the council has a full homelessness duty or are rough sleeping, who will still be awarded Band B, and those who aren’t. In the current policy, there is no additional priority given to street homeless rough sleepers over those who are “sofa-surfing”.

3.10 Local Priorities

3.10.1 Proposed Change
The existing Band A local priority awards for serious disrepair and supported housing move-on would become Band B awards.

3.10.2 Reasons
The current policy gives priority to these local priorities above and beyond a substantial number of the legally-mandated “reasonable preference” groups.

3.11 Welfare Priority

3.11.1 Proposed Change
The existing Band B and Band C welfare awards – for non-urgent cases – would be removed, leaving Band A welfare for urgent cases.

3.11.2 Reasons
Most of the reasons an applicant would be awarded Band B or Band C welfare in the existing policy are already reflected in other priority categories, so applicants can end up with duplicated awards. Urgent cases will still be able to be awarded the highest priority.

Q9. Do you agree with our proposals for changing existing banding priorities? If not, why not?
4. OTHER CHANGES

4.1 Exceptional circumstances

4.1.1 Current Policy
The current policy does not allow for any Exceptional Circumstances save for a few specific issues.

4.1.2 Proposed Change
The new policy would allow the HomeChoice and Housing Advice Team Manager to consider exceptional circumstances across the policy. Furthermore, applicants would retain the right to request a review of their application.

4.2 Contrived circumstances

4.2.1 Proposed Change
The new policy would assess applicants who have deliberately worsened their circumstances in order to qualify for additional priority on their housing need before the change in circumstances.

4.3 HomeChoice West

4.3.1 Current Policy
The HomeChoice West scheme gives applicants who have a local connection to Bristol, South Gloucestershire or Bath and North East Somerset Councils a local connection to 5% of all HomeChoice properties. To date, no HomeChoice West applicant has been housed under the scheme.

4.3.2 Proposed Change
HomeChoice West has been reviewed with our West of England partners and the decision has been made that North Somerset Council will withdraw from the scheme.

5. NEXT STEPS

This document, along with the first draft of the replacement HomeChoice Lettings and Assessment Policy, set out the issues we think arise from this review and our thoughts so far. We would very much like to hear from you and would welcome your feedback on these. Please feel free to submit any additional comments on any other points you wish to raise.
APPENDIX A – LIST OF CONSULTATION QUESTIONS

Q1. Do you agree with our proposals for applicants with local connections? If not, why not?
Q2. Do you agree with our proposals for qualifying groups? If not, why not?
Q3. Have we missed any key issues?
Q4. Do you agree with our proposals for excluded groups? If not, why not?
Q5. Have we missed any key issues?
Q6. Do you agree with our proposals for new banding priorities? If not, why not?
Q7. Have we missed any key issues?
Q8. Do you agree with our proposals for removing banding priorities? If not, why not?
Q9. Do you agree with our proposals for changing existing banding priorities? If not, why not?
### APPENDIX B – CURRENT AND PROPOSED BANDING CRITERIA

<table>
<thead>
<tr>
<th>CURRENT BANDING</th>
<th>PROPOSED BANDING</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Band A</strong></td>
<td><strong>Band A</strong></td>
</tr>
<tr>
<td>Approved Homeless + 3mo TA (RP)</td>
<td>Approved Homeless + 3mo TA (RP)</td>
</tr>
<tr>
<td>Lacking 3 bedrooms (RP)</td>
<td>Urgent Medical (RP)</td>
</tr>
<tr>
<td>Under-occupation</td>
<td>Urgent Welfare (RP)</td>
</tr>
<tr>
<td>High Medical (RP)</td>
<td>* Under-occupying 2 bedrooms</td>
</tr>
<tr>
<td>High Welfare (RP)</td>
<td>Lacking 3 bedrooms (RP)</td>
</tr>
<tr>
<td>RSL Improvements</td>
<td>Care Leavers</td>
</tr>
<tr>
<td>Serious Disrepair</td>
<td>Foster Care</td>
</tr>
<tr>
<td>Supported Housing Move On</td>
<td></td>
</tr>
<tr>
<td>Care Leavers</td>
<td></td>
</tr>
<tr>
<td>Foster Care</td>
<td></td>
</tr>
<tr>
<td><strong>Band B</strong></td>
<td><strong>Band B</strong></td>
</tr>
<tr>
<td>Approved Homeless (RP)</td>
<td>Approved Homeless (RP)</td>
</tr>
<tr>
<td>Significant Medical (RP)</td>
<td>Significant Medical (RP)</td>
</tr>
<tr>
<td>Significant Welfare (RP)</td>
<td>Lacking 2 bedrooms (RP)</td>
</tr>
<tr>
<td>Lacking 2 bedrooms (RP)</td>
<td>Homeless Prevention (RP)</td>
</tr>
<tr>
<td>Homeless Prevention (RP)</td>
<td>Rough Sleepers</td>
</tr>
<tr>
<td>Other homeless (RP)</td>
<td>* Under-occupying 1 bedroom</td>
</tr>
<tr>
<td>Split Family</td>
<td>Serious Disrepair</td>
</tr>
<tr>
<td></td>
<td>Supported Housing Move On</td>
</tr>
<tr>
<td><strong>Band C</strong></td>
<td><strong>Band C</strong></td>
</tr>
<tr>
<td>Minor Medical (RP)</td>
<td>Minor Medical (RP)</td>
</tr>
<tr>
<td>Minor Welfare (RP)</td>
<td>Significant Medical (RP)</td>
</tr>
<tr>
<td>Benefits eligible</td>
<td>Lacking 2 bedrooms (RP)</td>
</tr>
<tr>
<td>In Supported Housing</td>
<td>Homeless Prevention (RP)</td>
</tr>
<tr>
<td>Children in Flats</td>
<td>Rough Sleepers</td>
</tr>
<tr>
<td>Sharing facilities (RP)</td>
<td>* Under-occupying 1 bedroom</td>
</tr>
<tr>
<td>Lacking 1 bedroom (RP)</td>
<td>Serious Disrepair</td>
</tr>
<tr>
<td>Need to move for employment</td>
<td>Supported Housing Move On</td>
</tr>
<tr>
<td><strong>Band D</strong></td>
<td><strong>Band D</strong></td>
</tr>
<tr>
<td>Owner-occupiers</td>
<td>None of the above</td>
</tr>
<tr>
<td>Sufficient financial</td>
<td>Groups removed</td>
</tr>
<tr>
<td>Suitably housed</td>
<td>Split Family</td>
</tr>
<tr>
<td>None of the above</td>
<td>HB eligible</td>
</tr>
<tr>
<td></td>
<td>In Supported Housing</td>
</tr>
<tr>
<td></td>
<td>Children in Flats</td>
</tr>
<tr>
<td></td>
<td><strong>No longer eligible</strong></td>
</tr>
<tr>
<td></td>
<td>Owner-occupiers</td>
</tr>
<tr>
<td></td>
<td>Sufficient financial</td>
</tr>
</tbody>
</table>

Green = New criteria/Increased priority  
Red = Reduced priority  
* = Revised definition of the criteria