# Review of access to social housing in Jersey

## Government of Jersey

### APRIL 2019

**hqn**
CONSULTANCY

# Contents

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## 1.    Introduction

HQN was commissioned by the Department for Strategic Policy, Performance and Population of the Government of Jersey to undertake an end-to-end review of and make recommendations on enhancing the social housing allocations and lettings system.

### 1.1   Rationale for the review

The importance of the allocations and lettings system should not be under-estimated. In all countries with a social housing allocations system, new affordable housing completions per annum are a relatively small proportion of lettings each year. In Jersey, affordable housing completions have been in the order of 100 units per annum in recent years compared with over 200 lettings per year.

Furthermore, 'who is housed', 'how', 'when' and 'what type of social housing is provided' are hugely important issues in many countries. In Jersey, for instance, in relation to waiting times evidence suggests that approximately two-thirds of all eligible applicants are housed within a year of being accepted onto the waiting list with nearly 50% being housed within six months. This is a positive achievement.

Major changes in social housing were introduced by the Government of Jersey in the early part of this decade. A common waiting list administered by the Affordable Housing Gateway (AHG) was introduced in 2012. Other major developments included the establishment of Andium Homes as a States-owned housing company in 2014. This enacted one of the recommendations approved by the States Assembly in 'The Reform of Social Housing' (P.33/2013). The AHG was transferred to the Social Security Department (now Customer and Local Services) where it has been administered on behalf of the Minister for Housing since 2014.

Our interviews with stakeholders confirm that 'the majority of organisations consider that these changes have generally been positive'.

The Government of Jersey Housing Strategy (2016) sets out a vision for housing: *'All Islanders live in secure, high quality homes they can also afford'*. Maximising the use of existing and future stock is a priority. Actions include:

- Reviewing the eligibility criteria and allocations policies

- Assessing transfer incentives for households in social housing to downsize

- Checking that there is a flexible and efficient allocations system

- Ensuring that the needs of vulnerable groups are met.

Our review covers each of these four actions.

Furthermore, it is appropriate to assess the allocations and lettings system because of social/demographic changes, shifting patterns of need and concerns among stakeholders that 'some customers and organisations have variable understanding of different parts of the system'.

## 1.2   Terminology

For the sake of clarity and to avoid confusion, it is vital to clear up potential misunderstandings over terminology. The phrase, 'allocations and lettings' which is often simplified to 'allocations', is frequently used in the United Kingdom (UK) to cover four different sequential elements of the process:

- Eligibility of households to join the housing register or housing waiting list

- Banding of households into need categories

- Property banding for households, ie, the type of property that an eligible households is entitled to consider

- Lettings process by which a household is matched to an available property.

In addition, the advent of choice-based lettings (CBL) in many countries, such as the Netherlands, the Republic of Ireland and the UK, has created further complexity. For example, in England, many allocations systems (covering the four elements of the process) are often referred to by the name of the CBL system, eg, Coventry Homefinder, Homefinder Somerset and Warwick Homechoice.

Therefore, in this report, we use the phrase, 'allocations', to cover the four elements of the social housing allocations and lettings process. Where appropriate, of course, we refer to the specific elements, eg, eligibility, banding, etc.

## 1.3   The approach to the project

The project has involved various activities that are set out in more detail in Appendix one.

In summary, they are:

- Policy review, including a focus on other Western European countries, including France, the Netherlands, the Republic of Ireland and the four jurisdictions within the UK (England, Northern Ireland, Scotland and Wales)

- Desk-top analysis of current policies and processes in Jersey

- Analysis of housing register data held by the AHG

- Discussions and interviews on allocations issues with individuals and organisations on Jersey – these views are referenced in single inverted commas in the text ('…')

- Policy development workshops with individuals and organisations on Jersey.

Our approach has, thus, centred, firstly, on an informed generic view of social housing allocations drawing on our experience and knowledge of other countries. Secondly, this has been compared with the situation in Jersey. Thirdly the views of key stakeholders have been utilised. We have then drawn up a set of recommendations in the form of an action plan.

The project has been overseen by the Government of Jersey Department for Strategic Policy, Performance and Population (which now incorporates the Strategic Housing Unit).

## 1.4   Structure of the report

The next section sets out the broad policy framework within which the allocations system is located. This is followed by a focus on the role of social housing and the aims and objectives for allocations. There is then an analysis of the AHG housing waiting list data. This is followed by two sections covering policies and processes. The next section considers the role of allocations in meeting the needs of vulnerable households. The penultimate section discusses governance. Finally, there is an action plan.

Each section starts with a summary *in italics* of the main points.

## 1.5   Recommendations

There are broadly two types of recommendations. Firstly, there are proposed or 'in principle' recommendations where further research and development is required. Secondly, there are detailed recommendations which are ready for implementation.

There is a separate executive summary that includes the core recommendations. It can be read as a 'stand-alone' report.

The Housing Minister needs to consider these recommendations and decide on the next steps.

We believe that this should include consideration and discussion by all stakeholders with an interest in social housing.

## 2.   Policy framework

*The key messages from this brief review of the broader policy framework for allocations reflect the importance of appreciating the interconnections with other areas of public policy. Although this could be applied to any policy topic, it is unfortunately common for allocations reviews in other countries to take a narrow perspective focussing only on detailed processes and operational procedures.*

The three messages are:

- *Allocations policy interlinks with other policy areas that are outside the remit of this project, eg, the future of the private rented sector*

- *There must be an appreciation and recognition that changes in allocations will impact on other policy areas and vice-versa*

- *The Department for Strategic Policy, Performance and Population has a role in monitoring both of these types of impacts.*

## 2.1   Policy linkages

Although our focus is on allocations, it overlaps with issues that are outside the remit of this study. Many participants in our discussion sessions raised a wide range of other topics that they felt needed to be addressed to tackle housing issues in Jersey. We understand that a Housing Policy board is due to be set up to review the housing market in Jersey, and these topics should be considered as part of its deliberations.

It is vital to appreciate that allocations is (i) impacted on by other policies and (ii) affects these other policies. We suggest that the Department for Strategic Policy, Performance and Population has an important role to play in monitoring the impact of changes in allocations policies and processes on other policy areas and vice-versa.

Studies in other countries have, for instance, highlighted:

- Poor quality of and high costs in the private rented sector lead to increasing number of households seeking to join housing registers and housing waiting lists

- Rising prices in the owner occupied sector result in low income households looking towards the social rented sector even though they may have a relatively low band in terms of needs (assuming that they are eligible to be considered for social housing)

- Without an increase in the affordable housing stock, a growth in the size of housing waiting lists results in lengthening waiting times for households with relatively low needs.

Our discussions with key stakeholders in Jersey confirmed these findings of a number of significant overlapping policy areas. These are indicated in the diagram overleaf.

*Diagram one: Major policy links for allocations*
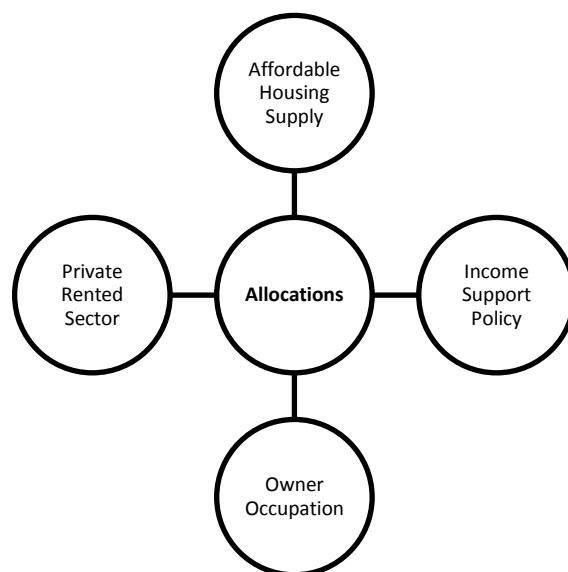


Examples of these policy connections and issues include, firstly, housing tenure and the relative priority between social housing, private renting and owner occupation. Linked to this is the contentious topic of lifelong tenancies in the social rented sector. In both England and the Netherlands, there have been discussions on whether households whose social and financial circumstances improve should be encouraged to move to a different tenure. In both countries, this has been rejected on implementation grounds (eg, difficulty of monitoring changes in household circumstances), policy challenges (eg, household circumstances may change frequently both negatively and positively) and political justifications (eg, role of social housing – see chapter three).

Secondly, and as an example of a more detailed overlap, allocations intersect with income support policy, which provides financial aid, including accommodation costs, for low income households. Some social housing landlords in Jersey are of the view that 'specialist accommodation for over-55s, in some cases, requires a higher income support rate because of the importance of having an extra bedroom, for instance, to meet informal care needs provided by family and friends'. Again, this is a specific issue in many countries. There is no straightforward solution as it depends on the relative priority between housing requirements, care needs, welfare benefits and public expenditure.

In relation to this example, although recognising the interconnections between allocations and income support policy, the Department for Strategic Policy, Performance and Population may be in a position to investigate it further as a result of this study.

The supply of new social rented housing is also a fundamental issue[1]. Andium Homes has a planned development programme of 2,000 new affordable homes (including social rented housing) by 2025 that will help to address the potential issue of a growth in the size of the waiting list. Analysis of the AHG data is one of a number of sources of information

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[1] The Government of Jersey commissioned an 'objective assessment of housing need' (OAHN) which was published in January 2019. It found that a minimum of 920 social rented units and 1,100 affordable home ownership dwellings will be needed between 2021 and 2030.

that can help determine the size and type of the affordable homes programme (see chapter four). Also of relevance will be the recently completed objective assessment of housing need (OAHN).

Our discussions with stakeholders also indicated 'concerns over (i) the lack of suitable properties for people with physical disabilities, (ii) a shortage of appropriate properties for older people especially frail elderly and (iii) the lack of starter homes'. In relation to the latter, a few stakeholders 'referred to types of provision in England, eg, shared ownership'.

Indeed, there was considerable discussion among stakeholders on 'the challenges faced by young couples and newly-forming households wishing to get on the bottom rungs of the owner occupation ladder'. We were also frequently informed during our discussions that 'rising housing prices made it difficult for even middle-income households to purchase property'.

Our analysis suggests that these households do not meet the current criteria for eligibility to join the social housing waiting list. An increase in the starter homes programme by Andium Homes would address this issue. But it is important to ensure that this does not lead to a reduction in the new build social rented programme and demand for both types of housing should be kept under close review.

Discussions with stakeholders identified a 'strong consensus on poor conditions in parts of the private rented stock that are experienced by households that are in housing need but are, at present, ineligible to join the AHG'.

But, in our opinion, opening up the waiting list to a wider range of households without boosting the supply of affordable housing would not solve the problem. Instead, the queue for social housing would grow.

The overlap and interrelationship between allocations and these other policy areas are, thus, significant. The diagram below demonstrates this point in relation to boosting new affordable rented housing supply:

*Diagram two: Impact of boosting affordable rented housing supply*



Limits New Starter Home Programme and, thus, Increases Waiting List

Reduces Size of Waiting List and /or Enables Widening of Eligibility Criteria

Boosting New Affordable Rented Housing Supply

There were also a further set of diverse issues raised by stakeholders. These included:

- 'Lack of sites for affordable rented housing'

- 'Environmental and design standards of some of the new housing being built on Jersey is not of the highest quality'

- 'Importance of housing for key workers such as teachers and health sector staff'

- 'Ten-year residency rule and the lack of 'entitled status' for these households'.

Again, we would argue that these are beyond the remit of our project. Nevertheless, whilst outside the scope of the study, we are cognisant that many of these issues will be considered by a Housing Policy Development board, and hope that the issues raised by stakeholders in this study will inform the work of the board.

These wider debates generated a multiplicity of perspectives relevant for allocations. At one extreme, it was suggested that 'allocations would remain a problem that was unresolvable until there was a major boost in housing supply'. Without an increase in social rented properties, 'tinkering with allocations was merely like rearranging the deckchairs on the Titanic'. However, an alternative perspective was that action on allocations ought to be a priority to ensure that those in greatest need were housed immediately 'at the expense of those that merely wished to improve their adequate housing circumstances'.

Our viewpoint is that there is a 'middle ground'. This recognises that allocations cannot be separated from other policies, but there are opportunities to begin to address issues. The starting point is clarifying the role of social housing in Jersey.

## 3. Allocations and the social rented sector

The key messages are:

- *Allocations should reflect the threefold role of social housing in meeting needs – meeting the requirements of households facing an urgent housing crisis, providing a safety net for disadvantaged households and addressing affordability issues*

- *Meeting housing need should, therefore, be the core aim of the allocations system, but this is difficult to define in detail*

- *Other objectives (such as neighbourhood sustainability and a customer-centred approach) should be treated as secondary aims.*

### 3.1 Introduction

There are two issues on the role of allocations. These are (i) the wider function of social housing and (ii) the aims and objectives for allocations.

Both the interviews with organisations and the policy development workshops included an explicit focus on these two issues.

It is important to appreciate that these wider debates are currently taking place in a number of Western European countries including Belgium, France, the Netherlands, the Republic of Ireland, Sweden and the UK (especially England). One of the authors of this report has made presentations on allocations and social housing in a number of countries over the last 18 months. Although specific-country factors are important, there are common concerns such as meeting housing needs in a situation where the supply of social rented housing is insufficient. In addition, the Grenfell tragedy in London in June 2017 has opened up an international debate on the future of social housing/affordable rented housing.

### 3.2 Role of social housing

In relation to the role of social housing, these international debates highlight that the allocations system potentially has to address three overlapping roles for social housing:

- Meeting the needs of households faced with an immediate housing crisis such as urgent medical needs. This is sometimes referred to as an '*ambulance service*' role

- Providing a *safety net* for disadvantaged households, eg, those facing homelessness or living in unsatisfactory housing conditions

- *Addressing affordability*, ie, meeting the needs of households that are unable to afford to buy on the open market or rent privately, but are not otherwise disadvantaged.

This overlaps with discussions that have taken place over the last four decades on social housing as a public good[2] and the residualisation of social housing[3]. This is normally defined as a service that is provided (i) without profit to all members of a society, either by the government or by a private organisation and (ii) to provide well-being and benefits to society as a whole.

Debates internationally and in individual countries are tending towards a perspective that each of these roles should be addressed. Nevertheless, there is a recognition that the reality is that social housing will primarily perform ambulance service and safety net roles without major policy and cultural changes (such as social housing as a tenure of choice with an equal status to owner occupation).

In our discussions and workshops in Jersey, there was a general agreement that all three roles are required.

This should be factored into future reviews of the housing strategy for the Government of Jersey.

A number of stakeholders felt that 'the existing system did not provide a comprehensive safety net because of the tight eligibility criteria for the AHG' (eg, single people under 50 on low incomes are normally ineligible as are households with an income of >£40,000 per year).

There was also a brief discussion by stakeholders on the ten-year residence rule, ie, people who do not have this 'entitled' status are excluded. Making recommendations on this latter criterion is not within the scope of this project.

In relation to the ambulance service role, there was a mixture of views among participants in the interviews and discussions and no consensus:

- Some third sector organisations argued vehemently that 'specific vulnerable groups received a poor service (eg, ex-offenders and people with alcohol and drug dependency issues)'

- This perspective overlapped with a feeling among some agencies that 'allocations was problematic for non-respectable groups'[4]

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[2] See, for example, http://www.housingeurope.eu/resource-981/social-housing-must-be-seen-as-an-important-public-good.

[3] There is a useful summary of the residualisation issue in Pearce, J. and Vine, J. (2013) Quantifying Residualisation – the changing nature of social housing in the UK, *Journal of Housing and the Built Environment*, Vol 29 No 4, pp 657-675.

[4] This term was not explicitly defined but we take this to mean marginalised groups that are stereotyped as 'problems for society' – see, for instance, Hanley, L. (2016) Respectable, Harmondsworth, Penguin Books.

- Social housing providers argued that 'existing housing waiting list band one deals with households in the greatest need' (see section five)

- Similarly, band six 'addresses the needs of households that are highly vulnerable'

- Some organisations indicated that 'greater flexibility through a case-by-case approach in the allocations system would enable individual households in potentially emergency situations to gain early access to accommodation'.

The phrase, 'ambulance service', was queried by some participants who argued that it 'fails to reflect the realities of life for some households such as families with a chaotic lifestyle that are faced with multiple disadvantages'.[5]

Nevertheless, there was an acceptance among stakeholders that 'households in urgent need often had a multiplicity of issues that required a much wider range of support including financial advice, social care and medical help'.

This generated discussions and interest in policy initiatives outside the scope of this project such as 'housing first' to tackle the needs of rough sleepers.[6]
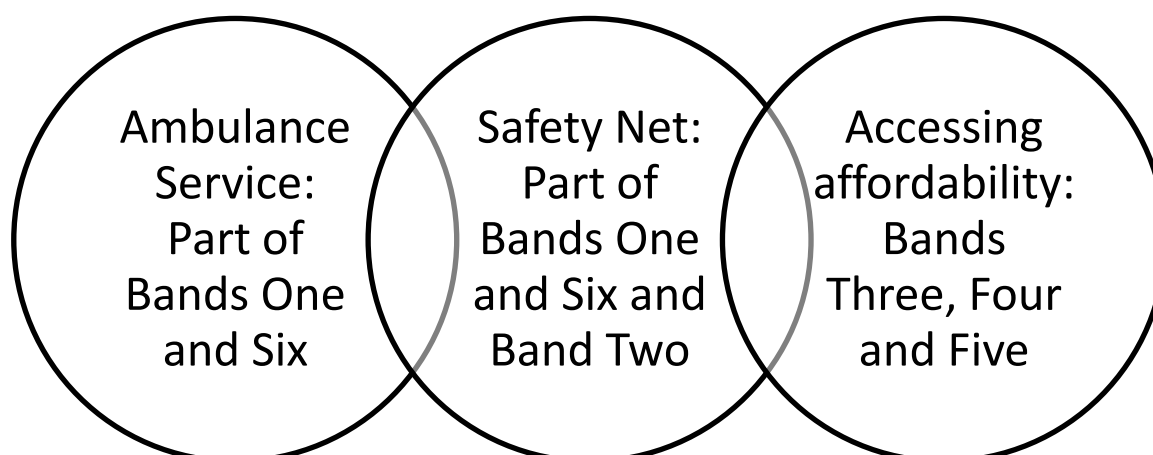
In relation to addressing the affordability role, there was a consensus among stakeholders that this issue had to be addressed in Jersey. There was, however, little agreement on the principles. One view was that the 'housing waiting list ought to be opened up to households unable to purchase or rent adequate accommodation through the market'. Social housing providers, however, pointed out that 'without a significant (but unquantified) boost in affordable rented housing, this would lead to these households either being in a low priority band and not re-housed or being given higher priority and displacing other existing groups'. The suggestion from some housing providers that 'there needed to be a development programme of low cost owner-occupied property such as starter homes' was generally accepted. But the same providers pointed out that 'this might be at the expense of boosting social rented housing'.

There was, nevertheless, a recognition of the overlap between these three roles and functions. Some participants commented that 'this contributed to a difficulty in aligning the existing banding system with these functions'. This is illustrated more generally in diagram three.

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[5] Reference was made by one participant to debates in the UK on the troubled families programme, who suggested that the term, families with multiple problems, was less stigmatising.

[6] 'Housing first' is a relatively recent innovation to address the issue of rough sleeping. It focuses on the provision of independent housing with few if any tenancy conditions on engaging with other services.

*Diagram three: Role of social housing and current bands*[7]

Ambulance Service: Part of Bands One and Six

Safety Net: Part of Bands One and Six and Band Two

Accessing affordability: Bands Three, Four and Five

This is further discussed in chapter five (see diagram six) that includes a proposed revised banding scheme. It should be noted that the discussion with organisations raised the practical issue of deciding on the relevant band for households on the borderline between bands.

## 3.3 Allocations' aims and objectives

The relationship between the role of social housing and allocation aims and objectives forms an element of the debate on the future of social housing in a number of Western European countries. In the Netherlands, for instance, a report in 2018 by AEDES (the trade body for housing corporations) highlights that central and local government policies to meet the needs of vulnerable households through the allocation system for social renting is leading to an increase in deprived neighbourhoods that requires additional housing management inputs and investment by housing corporations (which are the equivalent of UK housing associations).

The general message from this type of report is that decisions on the role of social housing has direct implications for allocations. In this case, a stronger focus on vulnerable households has resulted in neighbourhoods having a higher proportion of this type of household. This, then, has wider policy consequences – requirements for greater housing management and investment inputs by providers. It also impacts on other allocations policies such as the objective of having balanced communities. Thus, in many cases, there are multiple overlapping and conflicting aims.

The authors of this paper are, for example, aware of sub-regional allocations systems in England that have a dozen or more overlapping aims and objectives with no explicit prioritisation. These include meeting housing needs, helping vulnerable households,

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[7] The current banding system is set out in Appendix B.

providing consumer choice, contributing to geographical mobility, achieving efficiency, ensuring value for money (VfM), promoting downsizing, contributing to neighbourhood sustainability, maintaining the independence of social housing providers and helping to identify future housing requirements. In part, this has arisen because of the large number of partners operating across a sub-region such as local authorities, housing associations, third sector agencies and tenants' organisations. Each of these has different objectives in relation to allocations. As a result, there is a complex and lengthy operational procedure manual as well as frequent disputes between organisations over its interpretation.

In the Netherlands, there has been debate on primary and secondary aims. A number of pilot projects have been set up and evaluated to test different approaches. In other countries, there has been no similar systematic review. The Dutch experience indicates that there should be an agreement on the primary aim so that all partners and households seeking social housing are clear on 'the rules of the game'.

In Jersey, meeting each of the three overlapping roles of social housing is regarded by the vast majority of organisations in our discussions as important – ambulance service, safety net and affordability (see above).

However, there was no consensus among stakeholders on relative priorities. Some argued that households in each of these three categories were 'in need'.

Furthermore, stakeholders identified a range of other aims. But it was not necessarily fully appreciated that they may potentially conflict. For instance, there was discussion in one policy development workshop that neighbourhood sustainability lettings may hinder the objective of meeting high priority needs. But it was pointed out that 'if meeting need is a core aim then it ought to be prioritised over other considerations'. But as has been just pointed out, there was no specific agreement over the interpretation of 'need'.

The most frequently cited additional (and sometimes overlapping) aims mentioned by stakeholders were:

- Addressing the requirements of vulnerable households

- Helping to maintain and improve the sustainability of neighbourhoods

- Providing customers with a greater say in selecting a property – as part of a customer-centred approach

- Managing the stock efficiently

- Using information to contribute to aggregate assessments of housing requirements[8].

It should be noted that they are useful overlaps between meeting needs and some of the secondary aims/objectives. For instance, addressing the requirements of vulnerable households is strongly associated with meeting housing needs.

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[8] This issue is also briefly covered in the report on OAHN commissioned by the Government of Jersey and published in January 2019.

In relation to a customer-focus aim, a number of stakeholders indicated that it 'would be good to have a more open and transparent approach'. However, the idea of greater customer choice was, according to many stakeholders, 'extremely challenging because of the scale of need compared to the availability of property'.

In addition, careful analysis is required on the extent to which some of the secondary aims can be addressed through allocations. For instance, neighbourhood sustainability and allocations is a frequently debated and contested issue in many Western European countries. It was also raised as an issue in a number of our discussions and policy development workshops. Major points arising from research in France and England include:

- Definition of neighbourhood sustainability and is it the same as a mixed tenure neighbourhood and a balanced community?

- Geography of neighbourhoods (eg, size and location)

- Policy of maintaining or changing the existing socio-demographic profile of a neighbourhood

- Relative impact of allocations compared to other policy interventions.

Each of these aims raises challenging issues in terms of individual policies as well as potential tensions between them. Our interpretation of these aims and their issues from the discussions and the policy development workshops are summarised in the table below:

*Table one: Allocations and lettings objectives*

| Objectives (not listed in priority order) | Policy issues, eg | Broader requirements, eg |
|---|---|---|
| Housing need (see above) | Prioritising between different levels and types of need. | Balance between supply and need. |
| Vulnerable households | Defining vulnerability. Matching households with suitable properties. | Importance of links with care and support services. Co-ordination with 'Disability Strategy for Jersey'. |
| Neighbourhood sustainability | Identifying relevant criteria such as local connections, employment and voluntary sector contributions. | Relevance depends on level of turnover. Importance of links to other neighbourhood policies. |
| Customer-focus | Providing opportunities for customers to make informed choices. | Availability of information and housing advice. |

| Objectives (not listed in priority order) | Policy issues, eg | Broader requirements, eg |
|---|---|---|
| Efficiency | Letting properties as quickly as possible. Matching household with property sizes and types (eg, downsizing). Minimising turnover. | Tackling stock issues such as hard-to-let properties and void management. |
| Assessment of overall housing requirements | Analysing housing register and lettings data | Usefulness improves if there is an open waiting list. |

Our overall recommendation is that meeting housing need should be the primary aim of the allocations system. Defining 'housing need' in detail is discussed further in chapter five.

Care is needed over secondary aims and objectives, as there is a little research that demonstrates that allocations contribute significantly, for example, to neighbourhood sustainability.

Nevertheless, an underpinning theme in allocations in many countries is a person or customer-centred approach. This embraces ideas of choice, openness and transparency.

## 4.  Analysis of Affordable Housing Gateway (AHG) data

The major findings from the analysis are:

- *An increasing need for affordable housing since 2012*

- *Growing proportion of applicants in the highest priority band (band one)*

- *Significant number of households wishing to purchase but requiring some form of financial assistance (band five)*

- *Approximately 50% of all applicants that are housed are done so within six months of being accepted on the waiting list.*

Our approach on this analysis of AHG data is set out in detail in Appendix A. In brief, it has involved principally the analysis of:

- Changing composition of households on the housing register/waiting list between 2012 and 2017

- Different categories of households joining the housing register

- Outcome of the lettings process by band and waiting time.

Overall, at the end of the final quarter of 2017, there were nearly 750 households on the waiting list in bands covering social rented accommodation (bands 1,2,3,4 and 6). The breakdown by band was:

*Table two: Households on the housing waiting list (Q4, 2017)*

| Band | Number of Households |
|------|----------------------|
| One | 167 |
| Two | 321 |
| Three | 233 |
| Four | 11 |
| Six | 14 |

There were over 1,000 households in band five – wishing to purchase but requiring some kind of financial assistance.

The analysis of the pattern of households joining the waiting list since 2012 shows significant changes in (i) numbers and (ii) types of households.

Since 2012, there has been an increase in the number of applicants to the waiting list. The graph below, a four quarter moving average of the number of applicants over the six years to 2017, shows an increase in numbers starting in the first quarter of 2013, accelerating to the first quarter of 2014, and then slowing, plateauing and falling back slightly in 2015, before rising more slowly in 2016 and 2017.



Graph One: Four Quarter moving average - number of applicants to the waiting list
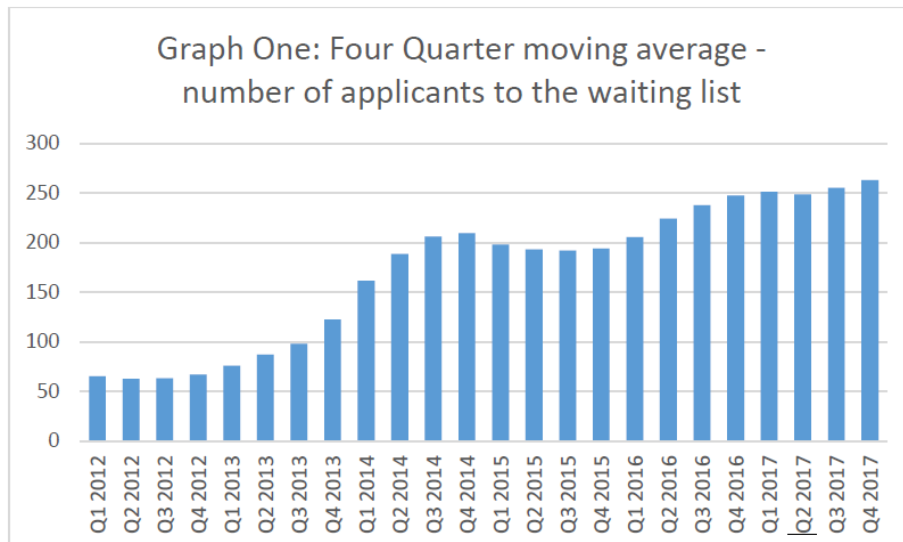
Over the same period, the number of people applying for housing in band one increased significantly, from around 20% of the total at the start of 2012 to average 55% in Q3 2016, before falling to an average of around 40% by the end of 2017. The proportion in band two started at an average of 40% in 2012, reduced to 23% in 2016 and then increased again to 35% by the end of 2017.



Graph Two: Application band analysis % - 4 Q moving average
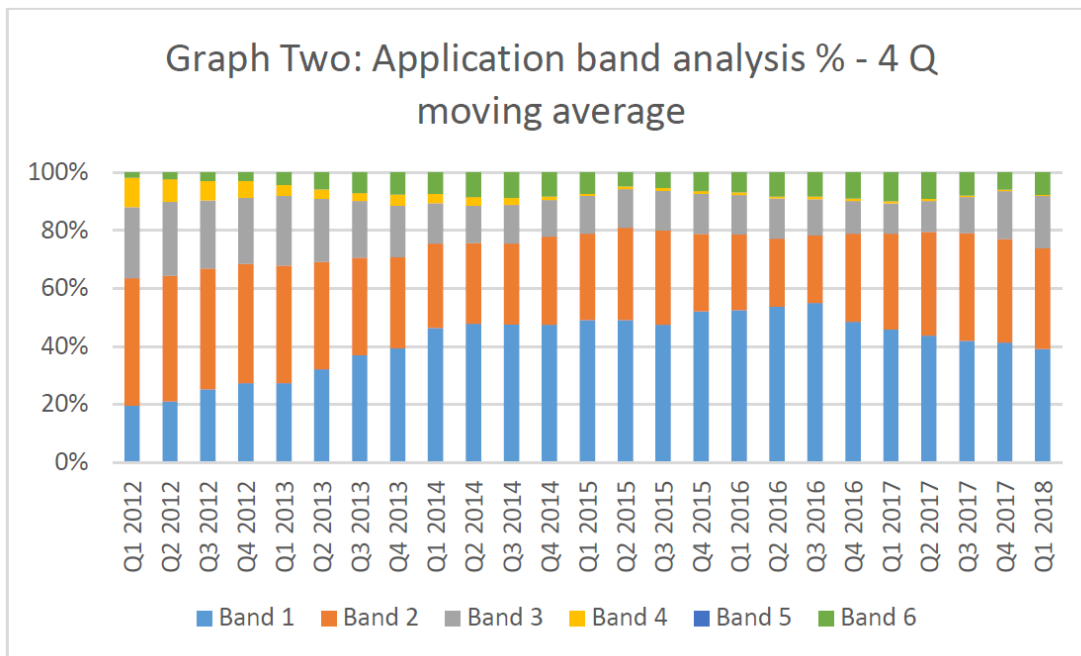
In relation to vulnerable groups, the number of applicants categorised as homeless (homeless, about to be made homeless, under threat of eviction, no rights to current accommodation, in tied-accommodation) increased by 20-fold between 2012 and mid-2017, and has then fallen back slightly.



Graph Three: Four quarter moving average - no. in homeless category
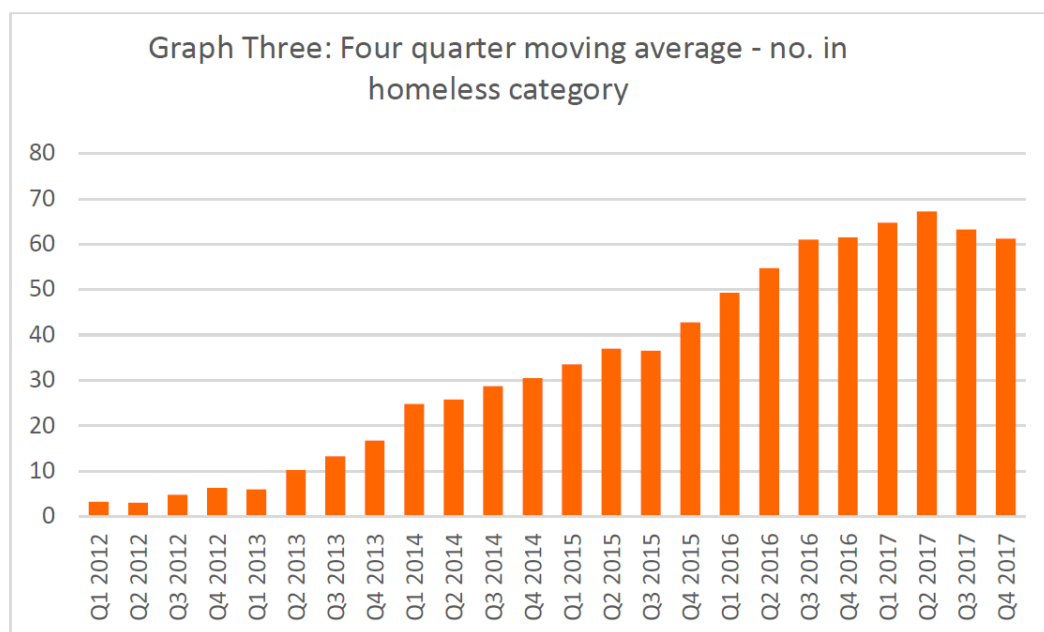
The number of applicants with medical or disability needs increased from an average of 10-15 in early 2012, to average around 30 from 2015, to 2017, with fluctuations between 23 and 40 (absolute numbers) across the same period.

**Graph Four: Four quarter moving average - no. medical/disability**
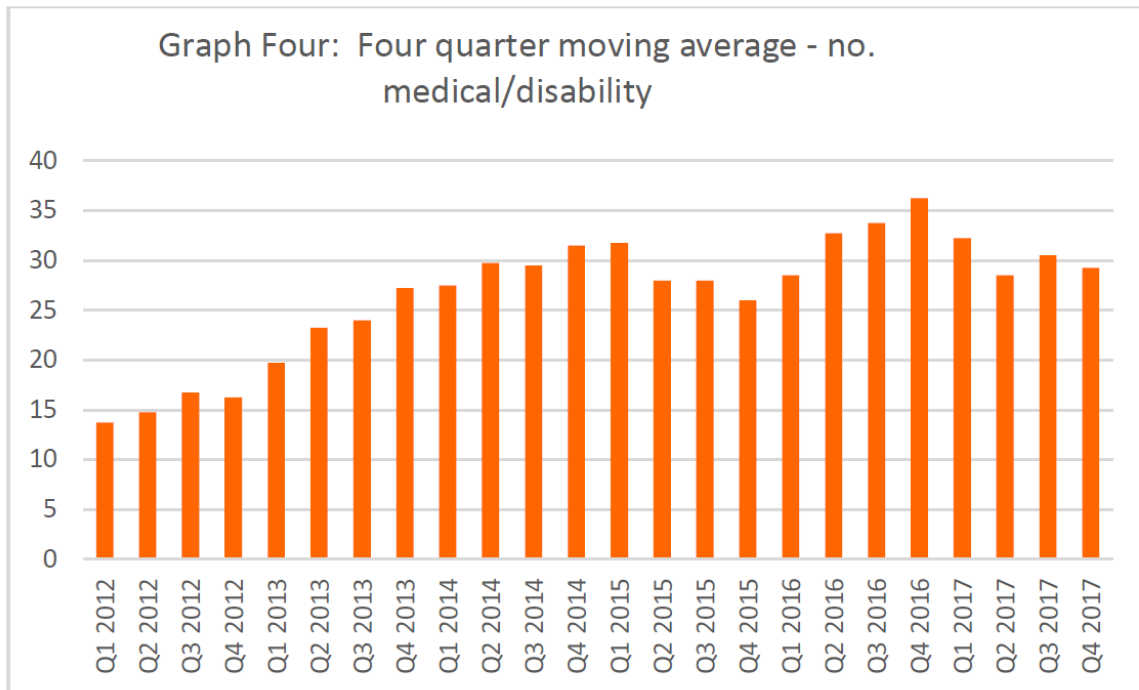


The percentage of applicants in unsatisfactory housing increased from an average of 15 to 20 per quarter in 2012 to average around 35 per quarter (with some fluctuations) between 2014 and 2017.

**Four quarter moving average - no. in unsatisfactory housing**
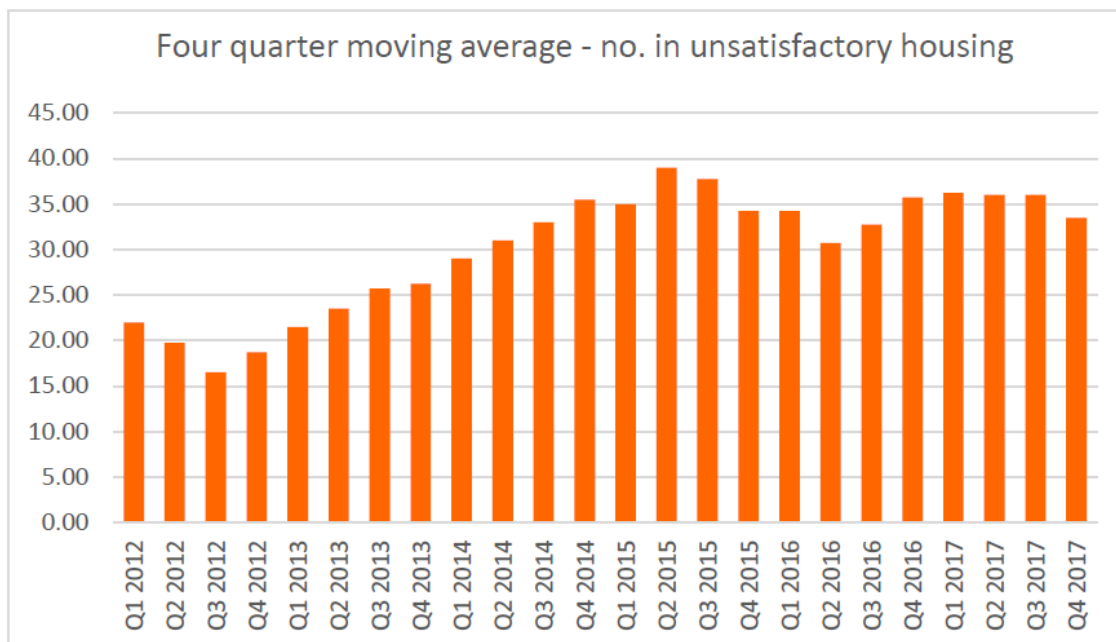
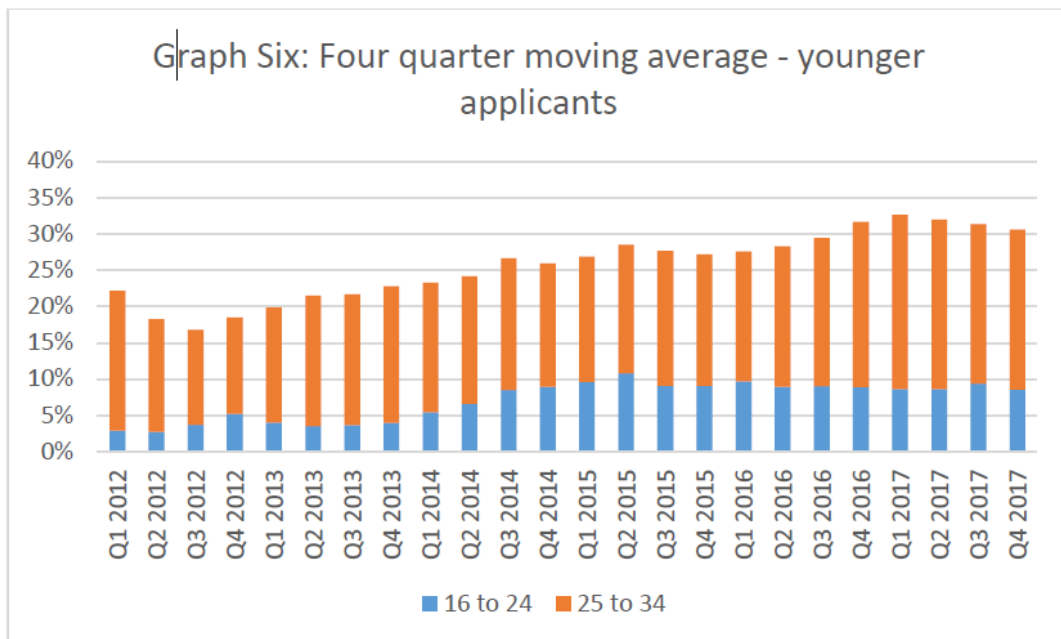The proportion of applicants by age of head of household and band is shown below:



Graph Five: Applicant analysis by age band
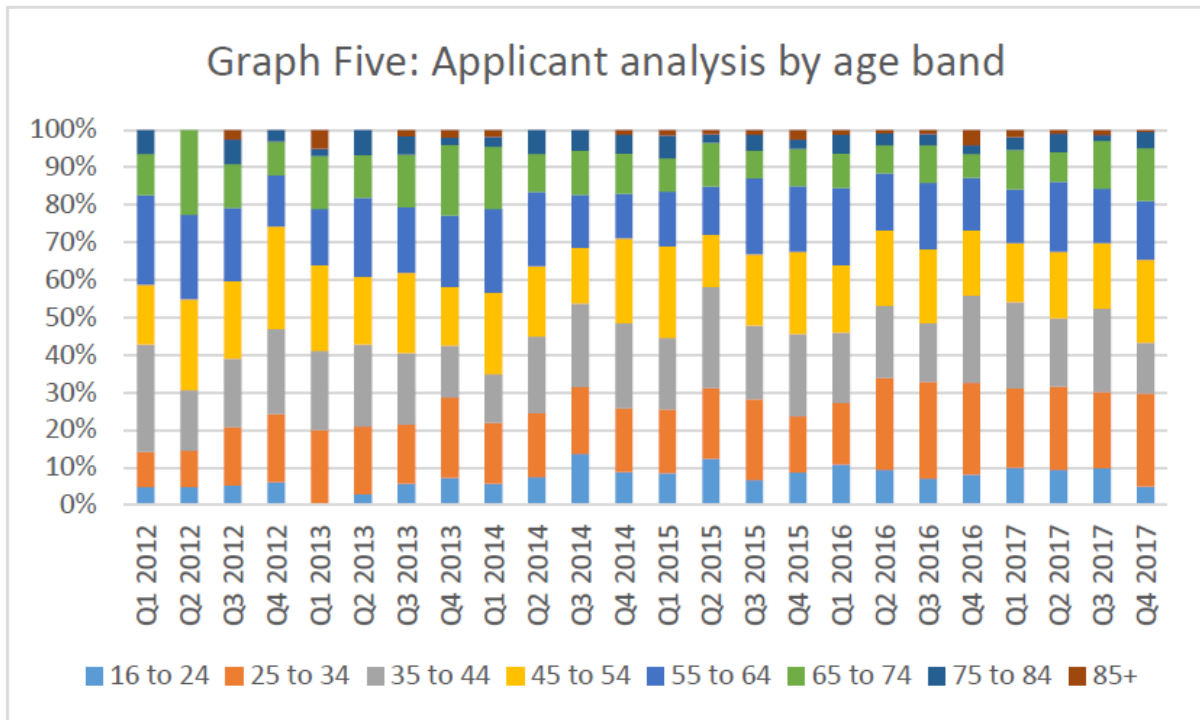
Breaking this down further into broader age categories, there has been a significant increase in the number of applicants aged between 16 and 34.



Graph Six: Four quarter moving average - younger applicants

The percentage of younger applicants has increased from c.20% in 2012 to over 30% in 2017. There has been a corresponding reduction in the proportion of older applicants between 2013 and 2017.

Graph Seven: Four week moving average of application age - over 65s
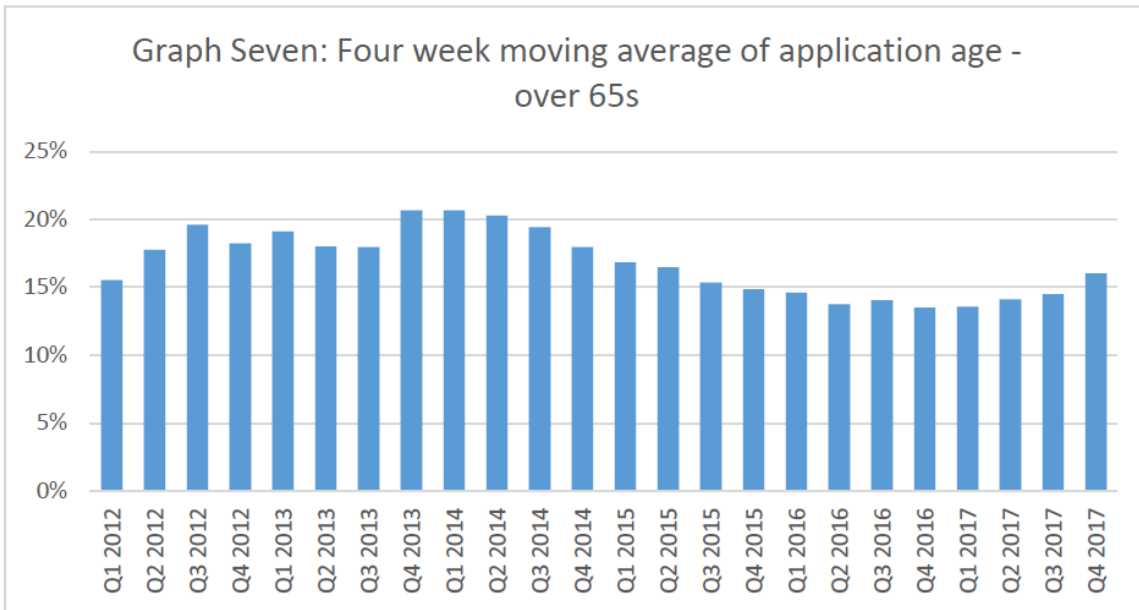
It is also notable (but not surprising) that the number of elderly applicant increases significantly during the colder first quarter of the year.



Diagram Four: Proportion of Elderly (65+) applicants by quarter
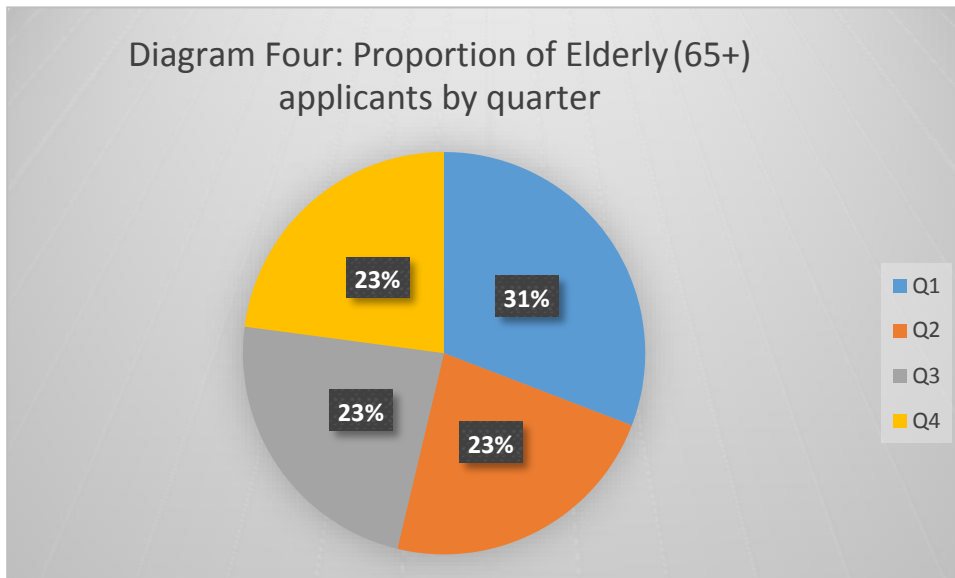
In relation to the changing patterns of need and banding including length of time on the waiting list and in each band, the graph below shows the time on the waiting list for each band:

Graph Eight: No. of people housed by band and waiting time
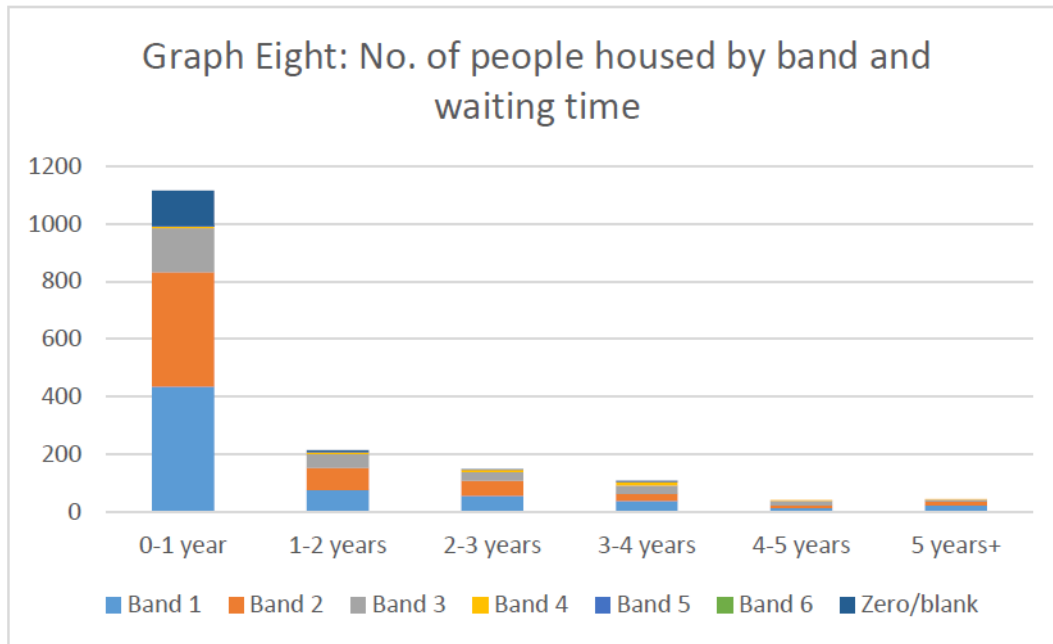
From the graph above, two-thirds (67%) of all applicants who are housed are housed within a year of being accepted onto the waiting list. For those housed within a year, the graph below analyses at what point within the year applicants are housed



Graph Nine: No. of people housed by band and waiting time within one year
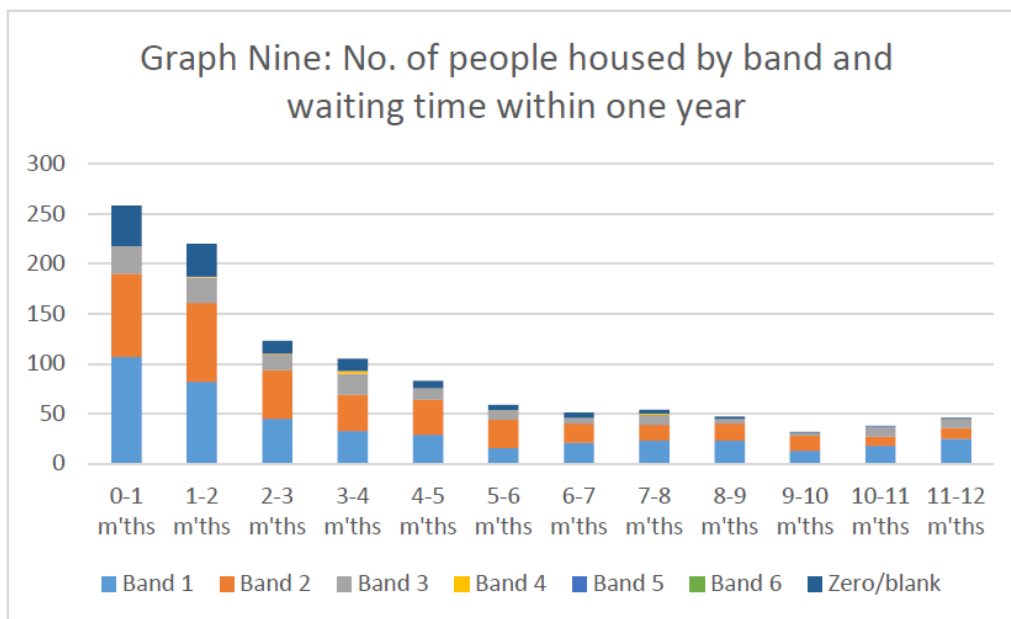
Approximately 50% of all applicants housed are housed within six months of being accepted onto the waiting list.

The graphs below show the proportion of applicants housed within each band:

## Graph Ten: Proportion of people housed by band and waiting time



Bands (legend): Band 1, Band 2, Band 3, Band 4, Band 5, Band 6, Zero/blank. Categories: 0-1 year, 1-2 years, 2-3 years, 3-4 years, 4-5 years, 5 years+.

## Graph Eleven: Proportion of people housed by band and waiting time within one year



Bands (legend): Band 1, Band 2, Band 3, Band 4, Band 5, Band 6, Zero/blank. Categories: 0-1 m'ths, 1-2 m'ths, 2-3 m'ths, 3-4 m'ths, 4-5 m'ths, 5-6 m'ths, 6-7 m'ths, 7-8 m'ths, 8-9 m'ths, 9-10 m'ths, 10-11 m'ths, 11-12 m'ths.

Because some applicants are housed without being allocated a banding (particularly those that are housed in the first six months), it is difficult to form a definitive view of the proportion of people in different bandings housed within the first year. However we can see that, ignoring those housed with no banding, around 80-90% of applicants housed in the first ten months of being accepted onto the waiting list are in bands one or two. This decreases to fewer than 80% in months 11 and 12, reduces again to around 70% in years two and three, and then 50-60% in years four and five. After two to five years on the

waiting list an increasing proportion of band three and four applicants are housed.

The median time on the waiting list before being housed is six months, with a mean time of 13.32 months (the mean time is significantly higher than the median time because there are a few people that wait for several years to be housed).

The breakdown of 'active' applicants on the current waiting list is shown below. It can be seen that 75% of the applicants on the current waiting list are in bands two and three, with a further 21% in band one.



Diagram Five: Waiting list bandings for 'Active' applicants in 2018

■ Band 1   ■ Band 2   ■ Band 3   ■ Band 4   ■ Band 5   ■ Band 6
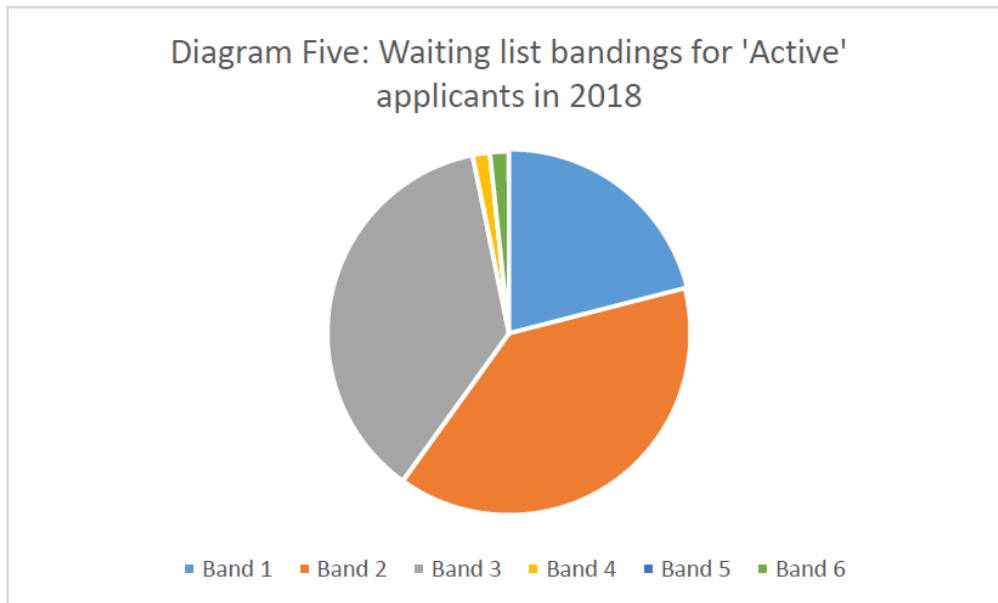
The average waiting time for 'active' applicants by band at 31 January 2018 is shown below. The average waiting time for 'active' band one applicants is higher than other bands, which is surprising as this is the band with the highest priority on the waiting list. The relatively low average waiting time for band five applicants may not be truly representative, as only there were only two 'active' applicants in this band at 31 January 2018.



Graph Twelve: Average time on the waiting list for 'active' applicants, by band, as at 31/1/18
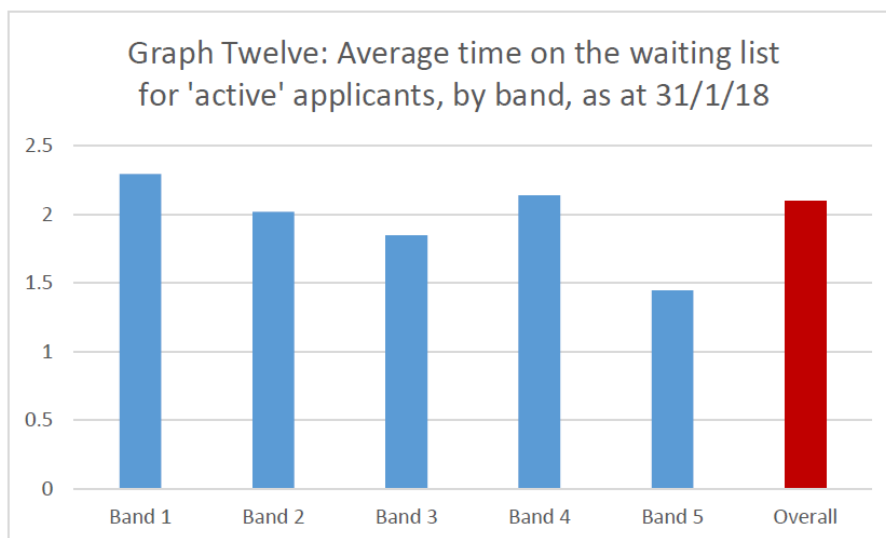
The average overall waiting time (across all bands) at 31 January was just over two years. As the mean time on the waiting list before being housed is thirteen months, which is much less than the average waiting time for 'active' applicants on the waiting list at 31 January 2018, this may indicate that some applicants have specific housing requirements which mean that they take significantly longer to be housed.

## 5.    Policies

The major recommendations cover three out of the four elements of allocations and lettings as set out in paragraph 1.9. They are eligibility, needs banding and lettings.

They are:

- *Widening of the eligibility criteria, subject to further research and development, by (i) including single people between 25 and 49 years of age and on low incomes and (ii) updating and modifying the household income criterion*

- *Revising the banding system by introducing (i) three levels of housing need, (ii) a specific and discrete scheme for vulnerable households with care and support requirements and (iii) a separate system for accessing low-cost home ownership (see also Appendix two for a summary)*

- *Introducing a single lettings system based on choice-based lettings principles (CBL).*

*These are far-reaching and challenging recommendations. They, nevertheless, reflect the key messages in sections two and three, especially the primary aim of the allocations system in meeting housing needs.*

### 5.1  Introduction

There are three areas within the allocations system that are the focus of attention in this chapter. These are access and eligibility, assessment and banding and lettings. Our major recommendations focus on (i) eligibility criteria, (ii) banding and (iii) lettings.

For the sake of clarity, we define 'policy' as a statement of intent based on principles to guide decisions. Policy is implemented through detailed processes and procedures. In the case of this study, the principles underpinning our policy recommendations are set out in chapter three. The policies can be delivered/implemented primarily through the procedures and processes set out in chapter six.

Each of the three sub-sections below consist of:

- Description and analysis of the issues drawing on our international policy review

- Supporting evidence from the discussions and the data analysis

- Recommendations

- Likely impact.

## 5.2  *Access and eligibility*

Internationally, eligibility to join a housing register or waiting list is a significant and complex issue. There are usually a number of dimensions including:

- Status of migrants and guest workers

- Socio-economic and demographic characteristics including age of head of household and income

- Behavioural characteristics such as anti-social behaviour (ASB), criminal convictions and previous rent arrears.

In Western Europe, countries have adopted different approaches. For example, guest workers may be eligible for social housing for a fixed period or be excluded from the right to social housing. Similarly, there may or may not be income thresholds above which households are not eligible for social housing. Finally, behavioural characteristics may result in absolute exclusion or temporary ineligibility until the issue is satisfactorily resolved (eg, ASB and previous rent arrears).

Despite these differences, one of the underpinning themes on eligibility is the challenging issue of limiting the number of households able to access social housing because of the shortage of supply.

In Jersey, our interviews and discussions with stakeholders indicated a consensus that the 'existing household eligibility criteria should be less restrictive for residentially-qualified applicants'. It, nevertheless, should be noted that a small number of the interviews and discussions raised the issue of 'widening the criteria to include non-residentially qualified households'. This topic is, however, outside the remit of this project.

The less restrictive eligibility viewpoint was maintained by stakeholders even when we highlighted to participants that without boosting the supply of social rented housing, this would most likely lead to a larger waiting list and longer times before households are housed. But, as a number of stakeholders observed, 'widening the eligibility rules addresses the objectives on housing need as well as contributing to helping vulnerable households'.

Two major eligibility changes were recommended by stakeholders:

- Single people between 25 and 49 years of age on low incomes should be eligible. Currently the criterion is 50 year of age and over and on low incomes

- Household income criterion should be increased and regularly reviewed – currently the figure is <£40,000 per year.

It was also suggested by a few organisations that 'the single person on low income criterion should be further extended to include 18-24 year olds'. It was highlighted that income support policy would need to be amended as it does not normally cover accommodation costs for adults under 25 years of age except in special circumstances (eg, care leavers). There were, however, mixed views on the importance of this issue. Some stakeholders suggested that 'this was not a significant problem as existing policies and procedures catered for young adults in emergency housing need'. This was contradicted by others who felt that there was unmet needs. Better data and information is, therefore, required on the nature and scale of this issue before coming to a clear conclusion.

Our view on the existing eligibility criteria is that they appear to be restrictive and are not in line with policies in other countries. It is now unusual to have such strict age restrictions on access to social housing. The impact of relaxing these rules should, nevertheless, be investigated.

There are, in addition, further challenges in implementing revised eligibility criteria. These are set out below.

In relation to the income threshold criterion, this is commonly used in many countries. Detailed approaches vary widely but the principles are based on aligning national welfare benefits with local housing costs. In most jurisdictions, these are regularly reviewed. Furthermore, debates in other countries, especially the Netherlands, have also centred on household eligibility for social housing relative to private sector rents at the lower end of the market, tenure security and the quality of accommodation.

Thus, in Jersey, determining an appropriate level should primarily balance income support (IS) levels with household income/housing costs. Discussions are needed on household eligibility for social housing relative to rents and quality in the private rented sector. This requires further research and development. For example, defining household income involves a number of considerations (and frequently is a source of contention in other countries). Firstly, 'household income' has to include assets and savings as well as regular income. Secondly, income needs to take account of the nature of employment, such as self-employment and zero-hours contracts, which varies monthly and weekly.

Extending the eligibility criteria has implications for the availability of social rented property. If these changes significantly increase the number of households on the waiting list without a similar level of increase in stock, the result will merely be a larger queue for social housing. Indeed, as the previous chapter showed, the number of applicants applying to the waiting list is continuing to increase albeit more slowly in 2016 and 2017 than in earlier years (see graph one). We would suggest, therefore, that a modelling exercise is undertaken before any changes are agreed to estimate the potential scale of increase in the size of the waiting list as a result of the changes to the criteria.

Furthermore, the increase in the size of the waiting list without tackling stock availability could have the following consequences for customers:

- Dissatisfaction among existing households on the waiting list who may be concerned about a potentially lower likelihood of being re-housed

- Raised but dashed aspirations of households that become eligible to join the waiting list.

It is, therefore, important that actions on how to maximise stock availability are discussed as part of the debate on widening the eligibility criteria. Considerations might include discussions on the feasibility of (i) maximising the effective use of existing stock by positively promoting downsizing (see below), (ii) minimising the number of void/empty social rented properties and (iii) ensuring that the ambitious social housing development programme by Andium Homes is successfully implemented.

Equally important is the management of the waiting list to ensure that it represents an up-to-date picture of 'need' through the banding system. We understand that there are regular annual checks to ascertain whether households wish to remain on the list and that their current circumstances are correctly recorded (which will have an impact on banding decisions). This approach should be robustly enforced.[9]

Our recommendation is support for a widening of the eligibility criteria that could be phased in subject to the outcome of further research and development:

- Eligibility for single persons between 25 and 49 years of age on low incomes

- Household income criterion should be regularly reviewed.

This is conditional on the satisfactory outcome of further in-depth work covering the issues outlined in paragraphs 5.14. To 5.21. The recently-published OAHN study of housing requirements between 2021 and 2030 potentially provides a starting point for an analysis of some of these issues.

## 5.3 Assessment and banding

Our recommendations are far-reaching:

- Banding based on three levels of housing need

- Specific and discrete scheme for vulnerable households with care and support needs

- Separate system for accessing low-cost home ownership.

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[9] It is worth noting that in England, a number of councils have over the last decade adopted an approach that ensures only eligible households in significant need and likely to be housed in a reasonable timescale are likely to join or remain on the housing waiting list. Housing advice on options are provided to other households. In the case of Portsmouth, this resulted in the waiting list reducing from over 12,000 households to just over 2,000 households.

Prioritising different degrees of housing need in the allocations system is a fundamental issue in most countries. The current debate on the role of social housing as an ambulance service, safety net and/or an affordable housing service has further fuelled this debate, as has the issue of balancing the level of housing need with the available supply of social housing.

Historically, most countries in Western Europe adopted a points-based system that centred on allocating a number of points (and often a range of points) for each need issue (eg, overcrowding, loss of a private tenancy, health issues linked to existing accommodation). However, since the late 1980s concerns have been raised such as the inaccuracy of allocating points, the frequent requirement to update points as the applicant's personal situation changes, the difficult for officers of making judgements on the apportionment of points and the lack of transparency for customers.

As a result, banding systems have become commonplace. Nevertheless, there has been a recognition, especially in England, that too many bands can create similar problems to points-based approaches. In recent years, therefore, there has been a move towards three-band systems which, of course, link to the three roles for social housing. For households in the same bands that have expressed an interest in a property, the determining factor is normally 'time on the waiting list'.

There was a consensus among stakeholder consultees that 'the existing system is not satisfactory'[10]. In fact, the issue of banding generated most debate and concern. For instance, band one (highest priority) included 'too many categories'. Other concerns comprised (i) 'households in band four, although currently small in number, are rarely if ever re-housed', (ii) queries on 'whether households in band three were likely to be re-housed in a reasonable timeframe', (iii) band five 'focuses on households wishing to purchase but require financial assistance and, therefore, are not considered (by some organisations) to be in significant need', (iv) 'band six (multi-agency supported housing) meets only the needs of some vulnerable households' and (vi) 'a lack of clarity on the 'rules' governing decision-making for households whose circumstances are borderline between bands' (see diagram three in section three).

The analysis in the previous section sheds some light on a number of these concerns. For example:

- As of Q4 2017, there were 167 active applicants in band one (nearly 25% of households in bands one, two, three, four and six)

- There are at least eight categories in band one and these include existing tenants under-occupying a property. There was 'discussion among stakeholders as to whether this amounted to need or was a management matter'. There was no consensus

- There were only 11 households in band four as of Q4 2017

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[10] Appendix B provides details of the current banding system.

- In relation to band three, there were 233 households as of Q4 2017. Households in this band are those 'whose current accommodation is unaffordable because of personal circumstances'. Band three households are most commonly housed after being on the waiting list for at least two years

- Band five comprised 1,022 households as of Q4 2017

- Band six comprised 14 households as of Q4 2017. This figure generated considerable debate in the discussion groups. It highlighted a degree of confusion over banding, the meaning of 'vulnerable households' and the definition of band six ('agency referrals through the supported housing group').

It is therefore recommended that the basic banding system for social housing should focus on three levels of 'housing need':

*Table three: Proposed main banding system for social housing*

| Band | Title | Type of Applicant |
|------|-------|-------------------|
| One | Urgent need | Actually homeless, under eviction notice, tied accommodation where employment has ceased, urgent medical issues, families forced to live apart, no right to stay in current accommodation, grave overcrowding. |
| Two | Moderate need | Poor housing standards, moderate medical needs, decants, addressing under-occupation to better meet needs, other transfers to meet needs. |
| Three | Low need | Only able to rent suitable accommodation in the private rented sector with financial assistance. |

N.B. For customers with care and support needs – see below.

For each category within each band, detailed criteria should be set out so that there is a clear understanding of and transparency over qualifying conditions. As far as is possible, there should be a clear demarcation between the three bands so as to avoid confusion for households that are potentially borderline between two bands. The challenge and importance of this is evident in many banding policies in England. For example, in the case of medical issues, allocations policies and procedures frequently include detailed tables distinguishing between urgent and moderate sub-criteria. The former might include *medical professionals not allowing an individual to be discharged from hospital to their current property,* and *individuals living alone with chronic mobility and or medical issues and with no support or contact with neighbours or family*. The latter might include *individuals having serious mobility or medical issues with no access to a lift or stair lift*. Linked to this is ensuring that there are clear procedures in place on medical assessments. This could involve the applicant working with a specific officer on

determining the appropriate banding and liaising with a medical professional such as an occupational therapist. There should also be guidance and rules on *additive issues* where a households has more than one moderate need. Nevertheless, even with detailed and specific guidance, flexibility in decision making is required on a case-by-case basis especially, where a household, for instance, has multiple moderate and low needs. The principle is, however, straightforward – minimising band overlap (compare diagrams three and six).

*Diagram six: Principle of minimising banding overlap*

Band One    Band Two    Band Three
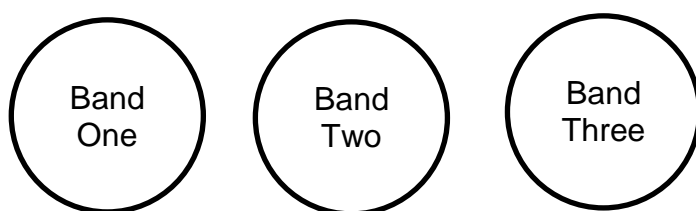
*Addressing under-occupation to better meet needs* is included in our recommendations as part of band two. It is sometimes referred to as downsizing. Internationally, there is a consensus that the issue should be tackled. Interrelated reasons include, firstly, making effective use of the social rented stock by releasing larger properties for households on the waiting list. Secondly, there is the issue of helping households (especially older people) to obtain a property that better suits their current and future needs. Thirdly, addressing rising welfare costs is significant, where the housing rent element is subsidised even where households under-occupy.

However, the major challenge is implementation. There are, at least, two dimensions to the problem. Firstly, an understanding of under-occupation is required. For example, what types of households under-occupy (often the assumption without necessarily any evidence is that it is older households) and is there a geographical pattern? Secondly, there is the use of effective policy instruments. These can be broadly categorised as 'carrot' and 'stick' measures. The former centre on positive incentives such as the availability of suitable properties in neighbourhoods where households wish to move, help with the moving process and a specific number of rent-free weeks. The latter focus primarily on financial disincentives to stay such as higher rents or withdrawal of rent subsidies. It is, however, important to appreciate that each country has its own specific issues because of social rent policies and welfare systems.

Although there has been only limited research on the effectiveness of the carrot and stick approaches, case studies in England demonstrate that the former are unsurprisingly favoured by customers leading to some successful outcomes. But there are three caveats. Firstly, a carrot approach is resource intensive in terms of finance and staff time. Secondly, and more importantly, the lack of suitable properties in neighbourhoods where they wish to live, as defined by the customer, limits the scale of activity. Thirdly, tenants (especially long-standing older tenants) are reluctant to move because of personal associations with their home and neighbourhood. In relation to the stick approach, this usually takes the

form of households being given notice that their rent will be increased or their welfare payments reduced at some specific point in the future and that they have in the meantime some sort of priority to transfer. In some cases, a social housing landlord will make one reasonable offer at the end of the time period to discharge their 'housing duty'. The limited research suggests a mixed outcome with a significant minority of households staying put and willing to accept a worse financial situation. There is also some evidence that the stick approach creates tensions with social housing landlords over the meaning of a reasonable offer and with welfare departments over rents and subsidies.

In Jersey, there are penalties within income support (IS) for households under-occupying that do not downsize after an agreed period. But one of the difficulties is the mismatch between pre-2014 and post-2014 rental levels which can provide an incentive for households to remain in under occupation; even with the penalty is applied. This is because households with a pre-2014 tenancy under-occupying, say, a three-bedroom property may pay a lower rent than in a post-2014 tenancy for a two-bedroom property.

Our advice is that '*addressing under-occupation to better meet needs*' should be provisionally included in band two, subject to the outcome of further joint work by the Government of Jersey and the social housing providers on the scale and nature of under-occupation as well as the IS/pre- and post-2014 rent issue. The findings would provide a basis for discussing the development of effective carrot and stick policies.

In terms of the overall allocations system, there would, in addition, need to be (i) a separate system for the small number of extreme emergency allocations covering, for example, victims of domestic violence and (ii) a mutual exchange scheme focussing on existing tenants wishing to move but with no or little housing need. The latter is particularly important to help those wishing to transfer who would otherwise have little chance of finding alternative social rented accommodation until their personal circumstances worsened.

In relation to the existing band five, it is recommended that this is renamed and managed independently as it does not constitute 'housing need'. It should focus on households seeking low cost owner occupied property (eg, starter homes) that require financial help. There should be an explicit income criterion on eligibility.

Nevertheless, as many stakeholders pointed out, there is a 'scarcity of suitable low cost home ownership stock and only a modest development programme by Andium Homes'. Assuming that the latter issue can be resolved (without a detrimental effect on the social housing development programme), it is vital that customers are kept regularly informed about the prospects for obtaining a suitable property in order to avoid unnecessarily raising customers' expectations. The proposed housing advice and support service could contribute to this role (see chapter six).

This change potentially impacts on the revised housing need banding system. Customers that are made more aware of the limited opportunities to access low income owner occupied property may opt to join band three, even though it is unlikely that they would be housed within two years.

Vulnerable households with care and support needs should be part of a specific and discrete scheme that is at arm's-length from the proposed banding system for social housing. It is likely that this will include some households that are currently in existing band one. It will enable greater attention to be paid to property eligibility criteria for such households as this was a concern raised by some third-sector organisations. More discussion and details can be found in section seven.

The process of determining the banding of an eligible household is currently undertaken by the AHG (except for existing bands five and six). We recommend that this continues. More details can be found in the next chapter.

Finally, the current and proposed banding systems are summarised and set out in Appendix two.

## 5.4  Lettings

We recommend a single lettings system based on choice-based lettings (CBL) principles for households that are in the new three-tier banding system. This can incorporate best-fit lettings approaches through the way in which adverts for available properties are labelled.

CBL is a system that originated in the city of Delft in the Netherlands[11] in the late 1980s and was transferred to parts of the UK in the mid-1990s. As a result of government policy in England, it became the required lettings method between 2003 and 2010. There has been interest in this approach in other countries in Western Europe including France, the Republic of Ireland and Sweden. It should be noted that the term, CBL, was introduced by the government in England in 2000. There continues to be debates on the appropriateness or otherwise of this term. For instance, there are concerns that it creates the illusion of significant customer choice in social renting. This is misleading especially in areas of high demand. More neutral terminology is, thus, often used such as 'homesearch', 'homefinder', etc.

There are six CBL interrelated principles:

- Initiative is taken by the customer who decides whether to respond to an advert if eligible

- Social housing information is readily available to help customers decide whether to make an expression of interest in an advertised property, eg, number and type of units by area and organisation, vacancy rates, refusal rates, popularity of stock types and neighbourhoods, etc

- Property and neighbourhood features for available properties can be easily accessed, eg, rents, room sizes, quality of schools, availability of public transport, etc

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[11] It should be noted that the 'Delft model', as it is referred to in the Netherlands is only one of a number of different Dutch allocations systems.

- Available properties are labelled according to clear and transparent selection criteria (eg, 'for households in a specific band' or 'for transfer applicants only')

- High quality communications systems

- Advice and support for customers.

In addition, there must be a system for vulnerable households. In practice, in England, this is either part of CBL or is through a separate approach (see chapter seven).

In Jersey, Andium Homes operates the equivalent of a choice-based lettings (CBLs) scheme. They have commented that this has cut re-let times and reduced refusals. The vast majority of social rented lettings in Jersey is by Andium Homes.

Other social housing providers in Jersey operate a best fit system, ie, matching households with available properties and neighbourhoods. Although the details vary between organisations, matching principles include size of household/size and type of property, level of housing need, connections to the local area/neighbourhood, community balance, etc. It should also be noted that there are relative fewer lettings per year compared to Andium Homes.

However, there is a case for greater transparency and simplification on the 'best-fit' approach to (i) promote better understanding among customers and other organisations on how this method operates and (ii) ensure that all eligible households on the waiting list are aware of and have the opportunity to express interest in properties that become available.

This can be achieved through a CBL approach by the labelling of available properties, eg, 'connections to a specific neighbourhood', 'letting by best-fit matching', etc. Households interested in a property advertised with such a label would respond as with any available advertised home. The social housing provider would then make a decision on the letting.

In addition, we suggest that the existing CBL scheme run by Andium Homes should be evaluated against the six principles listed above. For example, the scheme could be enhanced by providing feedback on completed lettings in tabular form covering the band of the successful applicant, the number of bidders, etc. This would provide additional information to unsuccessful customers (and organisations) on the likelihood of a successful future bid.

There was debate among organisations about penalisation of households that refuse offers. Our view is that as CBL has resulted in a fall in the number of refusals, there is not a strong housing case for penalisation.

## 6. Processes

The major recommendations are:

- Comprehensive coordinated documentation on the whole allocations system

- Housing advice and support service

- Revised appeals system (see also chapter eight).

### 6.1 Introduction

The importance of the allocations process should not be underestimated. From consumer studies that HQN and other organisations have undertaken in the UK, customers generally believe that processes should be straightforward, fair and transparent. Although there are primarily concerned about obtaining a good quality social rented property, they frequently express views on the adequacy or otherwise of the allocations process. Negative experiences can help to create a culture of dissatisfaction and scepticism.

In the UK (and other countries), these issues are addressed through:

- Single set of policy and procedures documents on the end-to-end allocations process

- Housing advice and support service

- Appeals system.

Furthermore, as was discussed in chapter three, one of the secondary aims of the allocations system in many countries is to operate a person/customer-centred service.

In Jersey, as has already been pointed out, customers (and some organisations) have a variable understanding of different parts of the allocations and lettings system. The discussion sessions, interviews and policy development workshops highlighted that some stakeholders felt that there was (i) 'a lack of a single comprehensive policy and procedures document(s)' and (ii) 'no one-stop housing advice and support service'. In relation to the latter, it was acknowledged by most participants that advice and guidance was available from many organisations, eg, Andium Homes, AHG, other social housing providers and third sector agencies. But this was 'fragmented and uncoordinated'.

Concerns were also expressed over 'the process of dealing with customer complaints and grievances'. Each organisation appeared to have procedures in place but we were informed that in some cases 'customer dissatisfaction cut across more than one element of the allocations system'.

## 6.2 Comprehensive documentation

In England, it is a legal requirement that a summary of the allocations scheme must be available. It is, therefore, standard practice for local authorities and their partners (eg, housing associations, advice and support organisations and third sector bodies) to produce (i) a single statement covering policy and operational procedures (though these are sometimes usefully separated into two documents) and (ii) a customer-friendly summary.

In Jersey, there is no single policy and procedures document. Each organisation has its own set of policies and operational procedures covering one or more stages of the allocations process.

It is, therefore, recommended, that the organisations involved in allocations should collaborate and jointly produce (i) a concise policy statement, (ii) an operational manual and (iii) a customer-friendly guide. All of these should be made widely available.

They should cover the entire end-to-end process (access and eligibility, assessment and banding and lettings). It should incorporate the policies and procedures of all organisations, eg, third sector advice organisations, AHG and social housing landlords. For example, the operational manual should, incorporate details of all of the processes/stages/forms used by AHG in assessing eligibility and banding.

We recognise that there may be an unwillingness by some organisations to share details of their procedures. However, we would argue that a customer-centred service requires a single set of documentation. A list of examples of useful practice from England can be found in Appendix three.

## 6.3 Housing advice and support

Housing advice services covering social housing, and especially allocations, are now a common feature in many countries in Western Europe. The drivers for this include:

- Aim of delivering a person/customer-centred service, ie, openness and transparency

- Customer choice, ie, ensuring that households are aware of the social housing options that are available

- Helping customers better understand the different elements of the allocations system, eg, eligibility, banding and lettings (especially the relatively recent adoption of a CBL approach)

- Managing customer expectations where there is high need for but relatively low supply of social housing.

The configuration of social housing advice services various enormously even within countries. In England, for example, they may be 'stand-alone', or part of a wider tenure-neutral service or a small element of a broader public sector consumer advice centre. In terms of governance and organisation, they may be run by a local authority, housing associations, third sector agencies or a partnership venture.

There is backing for a single housing advice and support service in Jersey. Many stakeholders felt that 'each organisation (to a greater or lesser extent) provided advice if and when required by customers'. But 'there was no single reference point' and 'no one-stop shop'.

Furthermore, there was a consensus that a housing advice service covering the allocations process 'from start to finish would improve levels of customer satisfaction'.

We, therefore, recommend, in principle, a one-stop shop for customers dealing with access/eligibility, assessment/banding and lettings. It would deliver advice online, face-to-face and by telephone. For example, it could provide (i) guidance on eligibility including help in completing forms, (ii) real time information on banding and property eligibility and (iii) advice on lettings including the likely waiting time for properties in specific areas of the island. It would necessitate bringing together in a one-stop shop, some of the advice and help services provided by stakeholders.

Suggestions have already been made to the Strategic Housing Unit (now part of the Department for Strategic Policy, Performance and Population) on setting up an advice and support service for people who face homelessness and/or who need alternative urgent accommodation as it has already been highlighted as a priority issue by politicians. This advice can be found in Appendix four.

Nevertheless, further detailed work is required covering, for instance:

- Scope and nature of social housing advice on allocations

- Potential wider role of social housing advice covering issues such as pre-tenancy advice, maintaining a tenancy, etc

- Possible links with advice/support for private renters and owner-occupiers

- Value for money (VfM) assessment of setting up a housing advice service

- Governance and organisation issues (see above and also chapter eight).

## 6.4 Appeals

Allocations systems in other countries normally include an appeals system(s) enabling customers (and their advisors) to challenge decisions on eligibility/access, banding and lettings. Excluding higher level legal challenges, there is usually a two-tier system involving (i) an independent review carried out by an officer within an organisation and (ii) an independent panel adjudicating on cases where the customer continues to be unhappy with the decision.

In Jersey, there was a consensus among most stakeholders that there was 'opaqueness on the processes for challenging decisions at the access/eligibility, assessment/banding and lettings stages'. Comments included that 'it was not clear who customers should appeal to' and 'there is a lack of information on the appeal procedures'.

These issues are compounded, according to some stakeholders, 'by the separation of AHG and social housing landlords'. We were informed on more than one occasion that 'some dissatisfied customers approach directly elected members and the relevant minister'. There was, thus, a concern expressed that 'this results potentially in different outcomes over the same issue'.

We recommend a two-stage process that should be human rights compliant:

- Independent officer review of a complaint within the relevant organisation

- If there is continued dissatisfaction, an independent panel, set up and managed by an independent regulator (see section eight), would adjudicate on the complaint.

This is discussed in more detail in chapter eight in relation to the issue of a statutory allocations scheme.

The operation of appeals system should be included in the comprehensive documentation.


## 7. Vulnerable households

The three key recommendations are:

- *Vulnerable households with care and support needs should be part of a specific and discrete scheme that is at arm's-length from the proposed banding system for social housing*

- *Allocations policy should be coordinated with broader strategies and initiatives that are being developed to address the needs of specific vulnerable groups*

- *Housing advice and care and support services must be integrated with the proposed allocations scheme both at a strategic level and an individual decision-making scale.*

### 7.1 Introduction

Meeting the housing and care needs of vulnerable households has, in recent decades, become a more important issue for the social housing sectors in many countries in Western Europe. This is because of a number of factors including the growth in numbers of older people on low incomes, the changing role of social housing towards an ambulance service and safety net function (see chapter three) and pressures on health services, eg, delayed transfers of care (DTOC), emergency admissions, etc.

As has already been pointed out in chapter five and as shown in the AHG data analysis in chapter four, the discussions and policy workshops highlighted the housing needs of vulnerable people. Issues flagged up included:

- 'Concern over whether the eligibility criteria resulted in some types of vulnerable households being excluded'. In particular, the needs of single people below 50 years of age with health, care and substance abuse issues were emphasised

- 'Confusion over the banding of vulnerable households between the existing bands one and six'. Some organisations appeared to be unaware of the specific criterion for band six – 'agency referrals through the supported housing group'. In addition, there was a view that 'some households in band one had significant and often multiple health and social care requirements'

- 'Lack of a single point of advice and support for vulnerable households seeking social housing' (though it was pointed out that pre-2012/13 the Government of Jersey Housing Department operated such a system)

- 'Importance of coordinating care and support packages with the allocations process'.

Organisations, especially those representing vulnerable households, considered that 'the current system was not fit-for-purpose'. They included those working with people with physical disabilities, mental health concerns and substance abuse issues as well as care leavers, homeless households and ex-offenders. In many cases, they emphasised the multiple issues facing individuals, which makes it challenging to categorise vulnerable households. A small number of organisations referred to a few families with multiple issues including housing, anti-social behaviour, school truancy, etc.

There was a hotly contested set of discussions on the extent to which some groups were seen as more deserving than others. A few third sector agencies argued vehemently that their client groups were not considered a priority relative to other vulnerable households.

Finally, although it is beyond the scope of this project, there was a concern over the lack of appropriate accommodation such as properties that meet life-time homes standards, extra care provision, dementia-friendly accommodation, etc.

## 7.2  Policy perspective

In relation to housing and vulnerable households, different countries adopt different policies (and these frequently vary between local authority areas). The starting point is the definition of vulnerable people and households. In principle, most Western European countries adopt a similar definition based around 'a person or household who is or may be for any reason unable to take care of themselves or prevent significant harm to themselves'. The challenge, however, is that service often operationalise this definition in

various ways. This is illustrated by the tensions over integrating and coordinating housing, health and social care in countries such as France, the Netherlands and the UK.[12]

From the perspective of social housing allocations, traditionally, the housing needs of vulnerable households were generally taken account of through the mainstream system by, for example, allocating additional or extra points based on vulnerabilities.

However, with the growth of use of CBL, two alternative approaches have been adopted:

- Integrating the housing needs of vulnerable people within a CBL system

- Operating a separate allocations system for vulnerable people.

The former involves vulnerable people making expressions of interest on advertised properties if eligible and using social housing and property data to make informed decisions. In many cases, suitable properties are advertised as prioritised for vulnerable households that have an approved care and support package. Housing advice and support for the customer (and friends and family) is a fundamental feature.

The latter adopts a best-fit approach and involves vulnerable households discussing with informal carers, family members and relevant professionals the type of property required and the suitability of specific units.

An important consideration that has been the subject of debate in the Netherlands and the UK is the degree to which certain groups of vulnerable people should be able to make decisions in the allocations process in the same manner as for all other households. Some advocacy groups vehemently argue that vulnerable households should have the same opportunities to choose as other households and this can be achieved through housing advice and support.

Nevertheless, the best-fit approach has been gaining ground, especially in England. This is for a number of reasons such as:

- Making effective use of adapted stock and specific schemes (eg, extra care)

- Ensuring that care and support packages are integrated with allocation decisions

- Taking account of neighbourhood issues such as balanced communities, availability of services and facilities and the impact on other tenants.

Nevertheless, the authors of this report in studies of allocations system for extra care housing and specialist accommodation have identified challenges with the best fit model. These include:

- Ensuring that there is transparency and openness in lettings decisions

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[12] A useful source of information is the papers in journals such as *Housing, Care and Support*. HQN coordinated a special edition of this journal based on the proceedings of a conference in London in May 2018.

- Guaranteeing that customers (and their friends and family) are aware of the housing choices and options that are available

- Making sure that decisions on lettings are made on the basis of the most up-to-date information on the personal circumstances of individual customers

- Ensuring that housing staff have an appropriate understanding of care and support and that health and social care staff appreciate the allocations system.

In Jersey, there are a number of broader policy debates that are raising the profile of some groups of vulnerable households. The Disability Strategy for Jersey (2017) sets out a series of relevant principles for social housing allocations, eg, the provision of accessible advice and guidance on housing options. Tackling DTOC through a pilot scheme was highlighted to us as a recent successful policy intervention. The needs of vulnerable young adults (19-25 year olds) are being addressed by the Jersey Youth Service.

It is, therefore, important that allocations policy is coordinated with these initiatives that are emerging through these broader debates and strategies.

Therefore, we recommend that vulnerable households with care and support needs should, in principle, be part of a specific scheme that is at arm's-length from the proposed banding system for social housing.

## 7.3  Processes and practices

Recommendations in the previous chapter will help to implement this policy proposal, especially a single housing advice service which should also provide guidance and support for vulnerable households and their friends and family. Again, this will require organisations that provide some housing advice services to vulnerable households to transfer these activities to the proposed one-stop shop.

The key elements of the allocations scheme could be:

- Customer has an approved care and support package (including a named coordinator) that is regularly reviewed to check that it is current

- Assessments have been carried out to confirm that the customer is eligible for social housing and is in housing need (according to the proposed banding system – see chapter five)

- Social housing providers would make available an agreed proportion/number of suitable vacant properties each year reflecting the scale and scope of the provider (and this would be annually reviewed). This would also take account of the availability of specialist accommodation

- Individual allocations would be made on a best fit basis as determined between the housing provider, the care and support coordinator and the vulnerable household and their representative(s).

There are a number of governance models that could be adopted as the scheme would generally be run independently from the mainstream allocations system. In England, one approach that appears to be growing in popularity is the use of a panel. For example, in Newcastle-upon-Tyne, there are two panels (one for extra care and one for supported housing). They both meet monthly covering, for instance, (i) approval of the eligibility of new applicants, (ii) review of existing applicants, (iii) lettings decisions based on a best fit approach (see below) and (iv) post-lettings feedback.

In discussions with a few stakeholders, the issue of best fit was raised, particularly the potential issue of varying definitions. Social housing providers also raised a linked concern of ensuring decisions reflected policies and procedures on tenancies and neighbourhood management.

Our viewpoint is that best fit should balance a number of competing priorities such as:

- Suitable home for the customer

- Appropriate neighbourhood for the customer

- Community and neighbourhood balance

- Value for money in the lettings process and subsequent housing management.

In our experience, a successful best fit approach requires an effective panel with members fully aware of the principles of the system and the individual circumstances of customers. Membership of the panel should, therefore, include:

- Independent chairperson

- Secretariat

- Care and support coordinators

- AHG

- Housing providers

- Other advisors representing vulnerable groups.

The detailed processes and procedures should be included in the comprehensive documentation on allocations (see previous chapter).

Further discussions will be required on governance and organisational aspects (see also chapter eight). For example, the panel could be administered by an existing organisation such as Andium Homes who currently manage the existing band six.

## 8.    Governance

The four major recommendations and observations are:

- *A statutory framework should be established for the allocations system*

- *Further discussions are required to agree the management and organisational framework for the new/revised functions of housing advice and support, low cost home ownership and vulnerable households*

- *A set of key performance indicators (KPIs) should be established and used as a monitoring mechanism*

- *Enhanced joint working between existing organisations is essential.*

### 8.1   Introduction

There are four linked issues – governance of social housing, management and organisations, collaboration and performance monitoring. We consider that although these are important issues, 'form should follow function'. Policies and processes (ie, functions) should take precedence over governance and organisational structures (ie, forms).

An international perspective on allocations highlights:

- Statutory framework for the governance of social housing allocations supplemented by guidance and regulations

- Regular monitoring of each of the elements of the allocations system, ie, eligibility, banding and lettings

- Importance of collaboration and partnership working between government, housing associations and third sector agencies

- Diverse range of management structures.

Each of these four issues was raised during our discussions and interviews as well as in the policy development workshops. The change in the governance of social housing in the early part of this decade with the establishment of Andium Homes was generally 'considered to have been a positive move'.

From an allocations viewpoint, a few stakeholders expressed concerns that certain elements (eg, assessing eligibility and, in most cases, determining banding) were still located within the Government of Jersey through the AHG. Our interpretation of this comment is that some organisations favour either an independent body or an existing provider to run these elements.

Linked to governance, the independence of all social housing providers (including Andium Homes) was, in principle, considered to be a 'constructive approach'. Nevertheless, 'some unease was expressed over the ability to influence and hold to account these providers'.

At the same time, providers (and some third sector agencies) were 'unsure if there were sufficient opportunities to effectively challenge the policies and procedures of the AHG'.

A reoccurring theme throughout the engagement with organisations was 'the importance of collaboration'. Because of the involvement in the allocations system of the Government of Jersey, social housing providers and third sector agencies, 'joint working was felt to be essential'.

Our recommendations in chapters five to seven on the establishment of a housing advice service, a low-cost home ownership function and a separate system for vulnerable households reinforces the importance of effective coordination.

Finally, although each organisation has its own monitoring procedures, we were surprised to find that there were no overall mechanisms to scrutinise the effectiveness of the whole allocations system.

## 8.2   Governance of social housing

There are two basic approaches – a statutory framework and a partnership arrangement. Both have advantages and disadvantages. For instance, the former has the benefits of clarity in terms of roles, responsibilities, policies and processes that enable organisations to be held to account. Disadvantages include that it can be difficult to modify as well as being potentially over-prescriptive if it is not carefully designed. A partnership approach can build on existing arrangements and be updated regularly as well as maintaining the independence of organisations. It, however, has the disadvantages of relying on the goodwill of individual organisations and there are few means of formally holding each of them to account.

In most Western European countries, as has already been pointed out, there is a statutory framework approach. However, these range from top-down prescriptive arrangements through to broad requirements. This is illustrated by comparing CBL requirements in England and the Netherlands. In the former, in the 2000s, there was a requirement that all local authorities should operate a specific detailed CBL system. This can be contrasted with the latter where the Dutch government requires municipalities and their partners to operate an allocations system but does not prescribe a specific model.

Our recommendation is that a statutory framework should be developed. This is because our discussions indicated that there is:

- No formal overall framework for allocations

- Social housing landlords value their independence but wish to have a greater influence on the operation of the AHG

- The Government of Jersey would like to be able to hold social landlords to account by monitoring performance

- Advice and support organisations require clarification on their roles and are able to formally influence the Government of Jersey AHG and social housing landlords.

Nevertheless, we recognise that this recommendation is challenging. But It represents the next step in fully implementing the Government of Jersey housing transformation project including proposals for a mechanism to regulate social housing. We also acknowledge that it needs to reflect the Government of Jersey's principles for governing services. In relation to the last point, we understand that most if not all other services are covered by statutory requirements.

The features of a statutory framework should reflect our major recommendations and cover the following principles:

- Role of social housing (see section 3.1.) and the primary focus of the allocations system of meeting housing need

- Eligibility criteria including their potential widening to include single people between 25 and 49 years of age on low incomes and a revised and regularly updated approach on affordability

- Revised banding system comprising three bands

- Lettings scheme based on CBL principles

- Separate and discrete system for vulnerable households with care and support requirements (as set out in chapter seven)

- Low-cost home ownership scheme for households wishing to become owner occupiers but requiring financial assistance that should be independent of the social housing allocations system

- Housing advice service

- Human rights compatible appeals system

- Performance monitoring

- Independent regulator (see below).

### 8.3 Management and organisations

Our recommendations do not necessarily affect the basic existing framework of the AHG and social housing landlords. There would, however, be new and/or modified functions, eg, housing advice, a distinct system for low cost home ownership, a separate framework for vulnerable households and independent regulation.

At this stage, we have not come to any conclusions on who should run which of these new functions (apart from the need for an independent regulator). We believe that discussion and agreement on the principles of these new functions should take priority over the organisational form. The next steps are considered further in chapter nine.

Nevertheless, a potential starting point would be to consider whether an existing organisation could and would be willing to take the lead role. In the case of low cost home

ownership and a framework for vulnerable households, for example, Andium Homes ought to be centrally involved in discussions. This is because, firstly, it is the only current provider of low cost homes and, secondly, it currently operates band six.

In relation to housing advice and support, the AHG and third sector agencies presently have a major role in performing this function as does Andium Homes (especially in relation to the lettings stage). Discussions should initially, therefore, involve these organisations in scoping the future direction for and governance of this new service.

## 8.4   Joint working

As has already been pointed out, joint working and co-operation between organisations is essential for the effective operation of an allocations system. There will need to be two dimensions and these should cover (i) strategic policy and (ii) operational processes and procedures.

The Government of Jersey, social housing landlords and other organisations should establish a forum(s) to develop and review both policies and procedures. We are aware that a Housing Policy Development board is in the process of being established, and we would suggest that consideration is given to either the forum being a formal sub-group or having close links with the main board.

We also envisage that the forum should be used to resolve day-to-day issues on the implementation of the allocations system. For example, AHG may find that the detailed banding criteria could be problematic thus requiring discussion on whether to propose a modification.

In relation to the separate allocations system for vulnerable households, the importance of collaboration has already been highlighted in chapter seven. An additional forum could be set up that also includes relevant third sector agencies. Alternatively, the proposed panel could perform this function.

## 8.5   Monitoring performance

An independent regulator should be set up to monitor performance and report annually to the Government of Jersey. It should also be responsible for the independent appeals system (see chapter six).

The nature and status of an independent regulator should reflect that of other similar bodies operating in Jersey that we were made aware of during our policy development workshops. These included the Jersey Care Commission and the Jersey Appointments Commission.

Monitoring should mainly be based on key performance indicators (KPIs) covering both process and outcomes.

These KPIs should be used primarily as 'can-openers', ie, to inform discussions and debate on the effectiveness of the allocation system at, for example, the forum(s) and/or panel as well as by the independent regulator in its annual reports.

The value of the KPIs will be enhanced once a time series of data and trends become available.

Linking KPIs with targets should be part of further discussions. But we would emphasise that there is a danger of over-simplification with targets being used as the sole set of measures of performance.

The table below illustrates possible KPIs.

*Table four: Possible KPIs*

| Objective | Indicative performance measure, eg |
|---|---|
| Meeting housing need | • Average length of time in each band before rehousing. |
| Helping vulnerable households | • % lettings to vulnerable households with care and support requirements<br>• Average length of time on vulnerable housing register. |
| Neighbourhood sustainability | • Average tenancy duration. |
| Customer-focus | • % of customers satisfied with allocations and lettings process<br>• Number of stage two appeals. |
| Efficiency | • Average length of time taken to assess eligibility<br>• Average length of time taken to assess banding and property eligibility<br>• Average length of time on housing waiting list<br>• % of households accepting first offer. |

# 9.    Action plan

This chapter sets out a possible action plan to take forward the recommendations principally in chapters, two and five – eight.

This should take account of the points raised in paragraphs 1.18 to 1.21. In particular, we would like to reiterate the importance of the Housing Minister considering the recommendations and deciding in the next steps.

We have set out our proposals in the table below.

However the following points should be carefully noted.

Firstly, there are some recommendations that could be taken forward relatively quickly especially where the majority of stakeholders are in favour of them. These include the establishment of an allocations forum, a panel covering the allocations system for vulnerable households and the KPIs.
Secondly other recommendations are 'in principle' and need considerable further work across a number of areas.

Thirdly, establishing a statutory framework for allocations (and its subsequent implementation) is likely to be a resource intensive task with a relatively lengthy timeframe.

Finally, and most importantly, the Housing Minister needs to reflect on our report and its recommendations and decide on the next steps.

*Table five: Action plan*

| Major proposal (and chapter reference) | Possible proposal owner | Action | Timetabled |
|---|---|---|---|
| Monitoring of the relationship between policies – Chapter two | Department for Strategic Policy, Performance and Population | Regular report on the impact of allocations policies on other public policies and vice versa | In place by end of 2019/20 and subject to staffing and resources |
| Changes to the eligibility criteria – Chapter five | Department for Strategic Policy, Performance and Population | Modifications to age criterion for single people on low incomes and the income criterion. Further work required on, for example, the impact on numbers of households on the waiting list | Further work to be undertaken in 2019/20 |
| Revised banding system - Chapter five | Department for Strategic Policy, Performance and Population | High, medium and low bands | Ought to be implemented at the same time as changes to the eligibility criteria |
| Single improved CBL lettings system – Chapter five | Andium Homes | All general needs lettings | If agreement by housing providers, this could be implemented by end of 2019/20 |

| Major proposal (and chapter reference) | Possible proposal owner | Action | Timetabled |
|---|---|---|---|
| Independent list covering households seeking low cost owner occupation – Chapter five | Andium Homes | Issue of supply of low cost home ownership properties has to be addressed | Implementation within 12 months |
| Housing advice service – Chapter six | Department for Customer & Local Services | One stop-shop on social housing allocations | Further work required on feasibility and governance in 2019/20 |
| Comprehensive documentation on allocations – Chapter six | Department for Customer & Local Services | Single set of documents covering end-to-end allocations process | Subject to the agreement of each organisation involved in the allocations system, this could be taken forward immediately with the current system |
| Revised appeals system – Chapter six | Department for Strategic Policy, Performance and Population | Two-tier appeals system | Likely to require statutory approval and therefore depends on legislative timetable |
| Allocations and vulnerable households – Chapter seven | Andium Homes/Department for Strategic Policy, Performance and Population | Setting up a separate and discrete system | Initial steps could be taken in 2019/20 such as establishing a formal panel as it can build on the existing band six system |

| Major proposal (and chapter reference) | Possible proposal owner | Action | Timetabled |
|---|---|---|---|
| Statutory framework for allocations – Chapter eight | Department for Strategic Policy, Performance and Population | Legislation and guidance | Subject to approval by the States Assembly |
| KPIs for allocations – Chapter eight | Department for Strategic Policy, Performance and Population | Process and outcome KPIs | Initial work could begin immediately subject to the agreement of organisations so that this could be in place by the end of 2019/20 |
| Allocations forum – Chapter eight | Department for Strategic Policy, Performance and Population | Discuss and take forward the recommendations in this report | Immediate action subject to resolving the status of the forum |

## Appendix one: research approach

### Introduction

The approach adopted for the project consisted of five elements:

- International policy review on allocations focussing, primarily, on Western European countries

- Desk-top analysis of relevant policies and procedures in Jersey

- Analysis of housing register data held by the AHG

- Discussions and interviews on allocations issues with individuals and organisations on Jersey

- Policy development workshops with individuals and organisations on Jersey.

These are each briefly discussed below.

### International policy review

The aim has been to highlight social housing allocations and lettings issues, strategies and practices in a range of different countries so as to help generate discussions as part of a review of policies and procedures for the Government of Jersey and its partners. More specifically, the main objectives have been to:

- Highlight social housing allocations and lettings issues in a range of countries

- Consider the policy and practice responses to these issues

- Focus on their relevance for Jersey.

The table below summarises the current primary allocations issues in the eight countries that were the focus of attention.

*Table six: Summary of allocations and lettings issues in eight countries*

| Country | Current primary issue as of 2018 |
| --- | --- |
| Australia | Reform of allocations and lettings through competition and choice to improve efficiency and develop customer influence. |
| France | Tackle opaqueness and improve transparency of the system for the customers. |
| Netherlands | Balancing customer choice, objective needs and sustainable communities. |

| Country | Current primary issue as of 2018 |
|---------|----------------------------------|
| Republic of Ireland | Efficient use of the existing stock. |
| England | Balancing the needs of priority groups with local discretion. |
| Northern Ireland | Housing those in greatest need. |
| Scotland | Meeting needs, transparency and efficiency. |
| Wales | Customer choice, efficiency and meeting needs. |

The focus has not been on detailed policy and practice transfer as this can be problematic because of different economic, political and social factors.

There is no up-to-date comprehensive comparative cross-national study on social housing allocations and lettings. The most useful overall sources have been:

Haffner M., Hoekstra J., Oxley M. and van der Heijden H. (2009) *Bridging the Gap between Social and Market Rented Housing in Six European Countries*, Amsterdam, IOS Press.

Houard N. (Ed) (2011) *Social Housing in Europe*, Paris, Ministere de l'Ecologie, du Developperment Durable, des Transports et du Logement.

These have been supplemented by more up-to-date material including (i) individual country reports on social housing and (ii) correspondence with experts on specific aspects of allocations. Wherever possible, the currency of information has been ensured through maintaining a watching brief on policy developments in each country.

### *Desk-top analysis*

The major reports and information sources that were reviewed are listed below:

AHG (2012) *Affordable Housing Gateway Eligibility Criteria – Policy HD52*, Jersey, Government of Jersey, AHG

AHG (various) *Month End Statistics*, Jersey, Government of Jersey, AHG.

Andium Homes (2018) *Annual Report* 2017, Jersey. Andium Homes.

Andium Homes (undated) *Strategic Business Plan 2017-2021*, Jersey, Andium Homes.

ARC (2019) *An Objective Assessment of Housing Need (OAHN) 2018 – Final Report*, Jersey, Government of Jersey.

Cambridge Centre for Housing & Planning Research (2009) *A Review of Social Housing in Jersey*, Cambridge, University of Cambridge, CCHPR.

Department for Community and Constitutional Affairs (2016) *Housing Strategy*, Jersey, Government of Jersey, Strategic Housing Unit.

Department of Social Security (2016) *Income Support Policy Guidelines*, Jersey, Government of Jersey, Department of Social Security.

Ministry of Housing (2017) *Project Specification: Review of Access to Social Housing in Jersey*, Jersey, Government of Jersey, Strategic Housing Unit.

Government of Jersey (2017) *Disability Strategy for Jersey*, Jersey, Government of Jersey (and Annual Progress Report, 2018).

Government of Jersey (2011) *Island Plan: Chapter Six – Housing*, Jersey, Government of Jersey.

Statistics Jersey (2018) *Housing Affordability in Jersey – 2017 Update*, Jersey, Government of Jersey, Statistics Jersey.

Statistics Jersey (various) *Quarterly House Price Index Reports*, Jersey, Government of Jersey, Statistics Jersey.

### Analysis of housing register data

The AHG has been examined from a number of different perspectives. The main types of analysis that have been used are as follows:

- Analysis of numbers of households on the waiting list. This provides an understanding of the demand and supply for social housing on the Island

- Analysis of the numbers applying for housing and joining the waiting list. This provides a perspective on the relative increase or decrease in demand across the 6 years from 2012 to 2017

- Analysis of the different categories of households on the waiting list and/or joining the waiting list. This includes both a trend analysis of the absolute numbers by category and the proportion in each category

- Four-quarter moving average of households joining the waiting list. A four-quarter moving average looks at the average number joining the waiting list over the current and previous three quarters. This has two benefits compared to analyses using absolute numbers and % category analysis

    – By smoothing short term variations in numbers across quarters, it provides a better understanding of long term trends; and

    – Because four quarters comprise a full calendar year, a four quarter moving average will largely eliminate seasonal effects, highlighting the underlying trends.

- A quarterly or seasonal analysis – this looks at the number of applicants joining the waiting list during each quarter in the year, enabling seasonal effects to be examined.

### *Discussions and interviews on allocations issues*

Semi-structured interviews and discussions took place between January and May 2018. The overall aim was to elicit views on a range of issues including:

- Overview of allocations and its relationship to the housing market

- Allocations policy including access and eligibility, banding and lettings

- Allocations process

- Allocations and vulnerable households

- Governance and administration.

The interviews and discussions took a variety of forms including:

- Individual/small group interviews

- Group discussions

- Telephone interviews.

A short briefing paper was, wherever possible, circulated to participants beforehand for the individual/small group interviews and the group discussions.

In relation to the group discussions, in some cases, two or more meetings took place comprising an initial scoping event followed by more in-depth discussions. Also, in a few cases, participants subsequently provided additional information and observations.

In the case of Members of the States Assembly, two discussion sessions were held. In addition a scoping meeting took place prior to these sessions with the Minister of Housing.

At the outset, it was agreed to maintain the confidentiality of participants.

The organisations that took part in the discussions and interviews are listed in the table below.

*Table seven: Organisations participating in the interviews and discussions*

| Organisation | Form | Other information |
|---|---|---|
| Andium Homes | Two group discussions | Over 4,500 affordable housing units.<br><br>Andium Homes Strategic Business Plan |
| Autism Jersey | Group discussion – community groups | |
| Brunel Management | Interview | Residential property management company – manager for Jersey Homes Trust |
| Causeway | Telephone interview | Accommodation and support for vulnerable women |
| Children's Commissioner | Telephone interview | Appointed in January 2018 |
| CTJ Housing Trust (Christians Together in Jersey) | Group discussion – housing providers | Approximately 150 units |
| Citizens Advice Jersey | Group discussion – community groups | |
| Department of Social Security | Three group discussions | Income support team, AHG team and policy team |
| Disability Strategy Team, Government of Jersey | Interview | Government of Jersey Disability Strategy (and annual updates) |
| Jersey Association for Youth and Friendship (JAYF) | Telephone interview | Set up in 1961 to provide accommodation and support for 16-25 year olds |
| Jersey dDeaf Partnership board | Group discussion – community groups | |
| Jersey Homes Trust | Group discussion – housing providers | Social housing provider set up in 1995 with over 750 units on 22 sites – see Brunel Management (above) |

| Organisation | Form | Other information |
|---|---|---|
| Jersey Probation Service | Interview | |
| Jersey Stroke Association | Group discussion – community groups | |
| Learning Disability Service, Health & Social Services, Government of Jersey | Telephone interview | |
| Les Amis | Group discussion – community groups | Set up in 1975 to provide care and support for people with learning disabilities |
| Les Vaux Housing Trust | Group discussion – housing providers | Set up in 1989 with over 350 units |
| Members of the States Assembly | Two discussion groups | |
| Occupational Therapy | Group discussion | Health and Social Services Department |
| Mind, Jersey | Telephone interview | Mental health |
| Plan B Jersey (Barnardo's) | Telephone interview | Support for young people 16-25 who are leaving care, living independently or in need of housing support |
| Shelter Trust | Interview | Accommodation and support for homeless households |
| Strategic Housing Unit | Two group discussions | |

N.B. In addition, four telephone interviews took place in April and May with 'applicants' – they included a former applicant that had recently been taken off the waiting list, a potential applicant that was waiting for confirmation on eligibility, an applicant in band three, and an applicant waiting to find out if a CBL bid had been successful.

### *Policy development workshops*

These workshops lasting between 60 and 90- minutes took place in April 2018. The aims were, firstly, to generate debate about the emerging findings from the interviews and discussions and, secondly, to identify potential future policies and procedures.

A briefing paper was circulated beforehand, wherever possible, to help set the scene for the workshops.

In total, five workshops took place and these are listed in the table below.

*Table eight: Policy development workshops*

| Workshop | Organisations/participants |
|---|---|
| Government of Jersey | Disability Strategy, Strategic Housing Unit, Probation Service, Citizen Advice Jersey, Children's Commissioner, Adult Social Services |
| Housing Trusts | Brunel Management, CTJ Housing Trust, Voisin-Hunter Ltd (managing agent of commercial and residential property in Jersey including CTJ Housing Trust) |
| Community Organisations | Jersey Stroke Association, Jersey dDeaf Partnership board, Les Amis, Plan B Jersey (Barnardo's), Shelter Trust, JAYF |
| Department of Social Security | Policy, Income Support and AHG |
| Andium Homes | |

It should be noted that, as with the interviews and discussions, some participants subsequently submitted further information that has been taken into account in the main report.

## Appendix two: current and proposed banding system

### Current Banding System

*Table nine: Current banding system*

| Band | Examples |
|------|----------|
| One | Homeless, under eviction notice (with a court order in place), in tied accommodate that is linked to your employment where employment has finished, unable to live or return to your present home because of an urgent medical issue, have no rights to stay in your current accommodation, forced to live apart from family because your current accommodation isn't suitable, staying in a hostel or shelter type accommodation, an existing tenant who is under-occupying. |
| Two | Have overcrowding problems (for example, opposite gender children sharing a room if there is an age gap of five or more years, or more than two children in one room), are in poor housing standards, have moderate medical issues. |
| Three | Adequately housed but are unable to afford your current rent without financial assistance |
| Four | Adequately housed and have little or no housing need but wish to change home. |
| Five | Want to purchase a property, but require some financial assistance to do so. |
| Six | Require ongoing landlord support to live independently and are only likely to be housed by certain landlords who can offer extra care. |

*Adapted from*
*https://www.gov.je/Home/RentingBuying/ApplicationAllocation/Pages/HowToApply.aspx*
*(access 01.03.19)*

## Proposed banding system

*Table ten: Proposed system*

| Main Banding System for Social Housing | | |
|---|---|---|
| Band | Title | Type of Applicant |
| One | Urgent need | Actually homeless, under eviction notice, tied accommodation where employment has ceased, urgent medical issues, families forced to live apart, no right to stay in current accommodation, grave overcrowding. |
| Two | Moderate need | Poor housing standards, moderate medical needs, decants, addressing under-occupation to better meet needs, other transfers to meet needs. |
| Three | Low need | Only able to rent suitable accommodation in the private rented sector with financial assistance. |
| Serious Emergency Cases – Social Housing | | |
| Serious Emergency Cases | | Examples include domestic violence and witness protection |
| Vulnerable Households – Social Housing | | |
| Vulnerable households with approved care and support package including a nominated care worker | | Examples include older households with health needs, people with learning disabilities including autism and homeless households with mental health issues |
| Households Seeking Low-cost Home Ownership | | |
| Households seeking to gain access subsidised house ownership (eg, shared ownership) | | Households on low incomes |

## Appendix three: list of examples of allocations, policies and processes documents (England)

These four examples have been selected to illustrate the types of documents covering allocations and lettings that are produced by English local authorities. It should be noted that these have not by externally verified as best practice by independent organisations.

The webpage links are correct as at spring 2019.

### Blackpool Borough Council/Blackpool Coastal Housing

Blackpool Coastal Housing manages council housing in the area. There is a sub-regional choice-based lettings (CBL) system – My Home Choice Fylde Coast – https://www.myhomechoicefyldecoast.co.uk.

This example illustrates a customer-friendly online approach, eg:

- Customer information page at http://www.myhomechoicefyldecoast.co.uk/content/Information.

- User-friendly guides at http://www.myhomechoicefyldecoast.co.uk/content/Guides. It includes flow charts and an online video.

The allocations policy and guidance (referred to as a 'consistent assessment policy') is relatively brief (33 pages) and can be accessed at http://www.myhomechoicefyldecoast.co.uk/Data/Pub/PublicWebsite/ImageLibrary/MHC%20CAP%201.0%20Final%202018.pdf.

Blackpool Borough Council/Blackpool Coastal Housing is also used as an example in Appendix four on a housing options service.

### Hull City Council

Hull City Council is a stock-owning local authority. Its allocation policy can be found at http://www.hull.gov.uk/housing/find-home/allocations-policy-and-local-lettings-policies. This website page has links to specific aspects such as lettings feedback. There are also separate documents on local lettings policies.

The allocations policy is relatively concise (35 pages). It is worth noting that both bands and points are used to determine priorities.

### Newcastle City Council/Your Homes Newcastle

Your Homes Newcastle (YHN) manages the Council housing in the city – see https://www.yhn.org.uk/.

The allocations policy can be accessed at https://www.newcastl, eg,ov.uk/housing/housing-policy-plans-and-performance/allocations-and-lettings-policy-

2017. It is understood that it is currently being reviewed. It is a highly detailed example of a 'policy' with a number of appendices and external links.

There is a separate webpage on local lettings criteria as well as links to selection criteria and processes/procedures for (i) extra care and older people and (ii) supported housing ( eg, learning disability and autism). The webpage link is https://www.newcastl, eg,ov.uk/housing/housing-policy-plans-and-performance/allocations-and-lettings-policy-2017/local-lettings.

*Tower Hamlets Council*

The council's allocations policy is linked to its 'common housing register partnership' – see https://www.towerhamlets.gov.uk/lgnl/housing/lettings_and_the_housing_list/th_allocations_scheme.aspx. The policy is under review and currently includes a summary, scheme detail and a guide to choice-based lettings. Specific guidance on banding can be found in appendices. The policy can be found at https://www.towerhamlets.gov.uk/Documents/Housing/Housing-provision/Allocations/Allocations_scheme.pdf.

The CBL partnership website is at http://www.thhs.org.uk/.

Tower Hamlets Council is also used as an example in Appendix four on a housing options service.

## Appendix four: summary of an advice note to the Government of Jersey on a housing options service

### *Defining Housing Options Services*

'Housing options' and 'housing advice and support' are terms that are frequently used interchangeably in England and the UK.

Strictly speaking, 'housing options' traditionally focused on providing independent advice to households based on individual circumstances in response to a major change in personal situations. 'Housing advice and support', on the other hand, has conventionally been associated with support to manage day-to-day living and/or dealing with the practicalities of an immediate crisis.

It is, therefore, important to clearly set out the scope of housing options/housing advice and support services.

### *Housing Options recommendations*

Based on our project on allocations for the Government of Jersey, our overall recommendations on housing options/advice and support are centred on the conventional definition of 'housing advice and support'. They are:

- Initial focus on a one-stop shop for social housing allocations including:

    - Online, face-to-face and telephone advice for households and third-sector organisations, especially vulnerable households

    - Guidance on eligibility to join the affordable housing register (AHR) including advice/help on completing forms and providing supplementary information, as well as signposting to other services/options for non-eligible households

    - Information on banding and property eligibility

    - Advice on lettings including (i) likely waiting times for properties, (ii) Andium Homes choice-based lettings system and (iii) the lettings systems used by housing trusts.

- Potential roll-out to include social housing tenancy advice, eg, pre-tenancy advice, maintaining a tenancy, etc

- Linking housing options/advice and support with other services (see below)

- Further extensions to include advice/support for private renters and owner-occupiers.

As we have pointed out in the main report, currently this information is generally available. But in some cases, it is not easily accessible and there is no specific one-stop shop.

## Scope of housing options services in England

There is a diversity of approaches on housing options and housing advice and support services. This is illustrated in England by the changing approaches since 2000.

In broad terms, the key features have been:

- Pre-2000, the emphasis was on conventional housing advice and support covering all tenures which was sometimes delivered by third-sector agencies, eg, law centres, local branches of Shelter, Citizens Advice Bureaux, etc

- Post-2000, with the growth of choice-based lettings (CBL), there was the development of the housing options approach. This was delivered primarily by councils and has centred on helping households with housing and related issues consider other options apart from social housing (eg, private renting, mutual exchange, adaptations to existing homes etc). In some cases, this has resulted in the subsequent development of specific services on, for example, private renting

- Housing advice services for specific groups (eg, older people) have become commonplace. These may operate nationally or locally with the former delivered online or by telephone

- Current focus on housing advice for homeless households following the homelessness prevention legislation and regulations, interest in the 'housing first' approach, and the rise in homelessness (including rough sleeping).

In relation to the latter, housing options services appear to be gradually being subsumed into the wider prevention agenda. This includes the greater use of personal plans (which pre-empted the prevention focus).

From a review of policy and research on housing advice and support, there are two interlinked re-occurring challenges in designing and delivering services:

- Connecting housing advice and support/housing options and information on tackling debt, understanding the legal system, addressing health issues, employment/training, welfare advice, etc

- Relationship between organisations providing advice and support.

There is, thus, a particular focus on vulnerable households with a multiplicity of needs. For example, one of the authors of this report participated in a study for Hull City Council in 2009/10 on setting up a one-stop shop covering a wide range of services (including housing). Findings included:

- Over 50% of customers had on-going relationships with three or more public sector services, while nearly 10% had regular contacts with eight or more services

- Housing issues were often symptoms of deeper underlying issues.

More generally, there is some research (as well as significant coverage in the media) of vulnerable households facing major issues in accessing different organisations for different services. In England, this has resulted in the national 'troubled families' programme which has focussed on providing a specific officer for each vulnerable household and the development of personal plans (see above).

These points reinforce the point that careful consideration is needed on scoping a service.

### Sources of information: England

#### National Organisations and Websites

There are a number of national organisations:

Association of Housing Advice Services (AHAS): It was set up in the early 1990s to represent councils. Its members primarily consist of local authorities in London and the South East. Its current focus is on implementing homelessness prevention requirements – see https://www.ahas.org.uk/.

Citizens Advice (formerly Citizens Advice Bureau – CAB): This is a national charity with over 300 local organisations. It provides advice on a wide range of issues as well as housing (eg, debt, the legal system, immigration, etc) –
https://www.citizensadvice.org.uk/housing/ .

Shelter and its housing advice service was set up in 1966. It now provides a face-to-face service, online support and a national telephone hotline –
http://england.shelter.org.uk/get_advice.

Housing Care (EAC) is an example of a national organisation that focuses on a specific group – older people – http://www.housingcare.org/jargon-housing-options.aspx.

Chartered Institute of Housing (CIH): Report on housing options and advice:
CIH (2013) *How to maximise housing options and advice*, Coventry, CIH – http://www.cih.org/publication-free/display/vpathDCR//templatedata/cih/publication-free/data/How_to%2520maximise_housing_options_and_advice.

#### Local Authorities

Two contrasting examples are Blackpool/Blackpool Coastal Housing and the London Borough of Tower Hamlets. The former is in a relatively low demand area with high levels of social deprivation, while the latter is in a high demand area.

Blackpool/Blackpool Coastal Housing: Blackpool Coastal Housing manages council housing in its area. There is a sub-regional choice-based lettings (CBL) system – My Home Choice Fylde Coast - https://www.myhomechoicefyldecoast.co.uk.

Housing options/housing advice and support is delivered through a number of activities including:

- Housing advice surgeries run by Blackpool Coastal Housing – http://www.bch.co.uk/Images/Home-Page/housing-surgery-times.pdf

- Housing options service run by Blackpool Borough Council including homelessness – https://www.blackpool.gov.uk/Residents/Housing/Housing-options/Housing-and-homelessness-advice.aspx

- Blackpool Borough Council's 'myblackpoolhome' website covering the private rented sector – https://myblackpoolhome.co.uk/.

London Borough of Tower Hamlets: Its council stock is managed by Tower Hamlets Homes. Allocations policy can be found at https://www.towerhamlets.gov.uk/lgnl/housing/lettings_and_the_housing_list/lettings_and_the_housing_list.aspx. Details of the CBL scheme (Tower Hamlets Homeseekers) can be found at https://www.thhs.org.uk/. There is a comprehensive housing options service - https://www.towerhamlets.gov.uk/lgnl/housing/housing_options_service/housing_options_service.aspx.

## Online Housing Options Toolkits

There are now widely used on-line housing options tools available (used by partnerships and individual social housing landlords). These are often an 'add-on' through choice-based lettings software. An example of this is Civica Social Housing (which took over Abritas in late 2016 which provided the software for over 160 social housing organisations) – see https://www.civica.com/en-gb/product-pages/abritas-housing-needs-solution/. There are modules on 'enhanced housing options' and 'housing advice and homelessness'.

Home Connections is an example of a social housing sector software provider – see https://www.home-connections.co.uk/. It has modules on homelessness reduction ('hope') and housing options ('housing options wizard').

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